

# Crawley<sup>2035</sup>

**Draft Crawley Borough Local Plan 2020 – 2035  
June 2019**

**For Early Engagement Consultation July – September 2019**





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## Foreword

Planning affects us all. The homes we live in, the places we work, the open spaces where we relax and the roads we travel on are all a result of planning decisions that have been made. Crawley Borough Council is revising the Local Plan in order to help to guide development in Crawley over the 15 years from 2020 – 2035.

To meet the needs of its growing population and its key economic role at the heart of the Gatwick Diamond, by 2035 Crawley would need to provide over 11,200 more homes, and provide enough employment floorspace to provide 5,595 more jobs. In the past, Crawley's growth has mainly been through the creation of entire new neighbourhoods, and commercial development at Manor Royal. Forge Wood is, however, the last full neighbourhood which can be built within the Borough boundary as there is simply no space left. All the large sites have been built out on Manor Royal, some already having been redeveloped.

We are, therefore, facing the challenge of incorporating additional and higher density development within our existing neighbourhoods, in Manor Royal, and within the town centre. This Local Plan aims to manage this change to ensure we do as much as we can to meet the housing and employment needs of our growing population whilst retaining the important character and features of the town which our residents, businesses and visitors value. The Plan's policies seek to secure high quality of design, with new development providing decent and affordable new homes and attractive workspaces whilst protecting the amenity and wellbeing of existing residents. It also aims to ensure new development is sustainable in location and construction, and promotes public transport, cycling and walking.

Even with further development within the borough, Crawley will not be able to meet its housing and employment needs in full because of its small size and constraints including flooding, aircraft noise and safeguarding. We are, therefore, reliant on effective cooperation with our neighbouring authorities to help address Crawley's unmet needs. New development may come forward just outside Crawley's boundaries, and this Plan seeks to ensure these developments will meet the needs of Crawley's residents, including for affordable housing, will follow Crawley's sustainable neighbourhood principle, and will provide the infrastructure they need to ensure they don't become a burden on the town.

This document is the first stage in drafting our new Local Plan, and is available for full public consultation.

I welcome your comments.

Councillor Peter Smith  
Cabinet Member for Planning and Economic Development  
Crawley Borough Council



## Crawley's Local Plan

- 1.1 The draft Crawley Local Plan Review seeks to revise the current adopted Crawley 2030 Local Plan in order to update it in accordance with national policies and local changes. This will ensure Crawley maintains an up-to-date Local Plan to support and direct the growth of the borough. The Local Plan is an important document which sets the way forward for planning the future of Crawley – where we live, work and visit – for the next 15 years. Once adopted, the document will replace the existing Local Plan (2015 – 2030) to provide the basis for future planning decisions in the borough. The Crawley Borough Local Plan Review will involve engagement with residents, businesses and other stakeholders throughout its production. The Local Plan provides a clear indication of the council's approach to the development of the town, including character, economic growth, housing, environment, infrastructure and Gatwick Airport. It provides the strategic and non-strategic planning policies for the borough.
- 1.2 This document forms the draft preferred Crawley Borough Local Plan and is published for public consultation. It contains the emerging draft strategic and non-strategic planning policies and principles to help shape the future of the town. Some of the Policies are proposed to be retained from the existing Local Plan, others are to be changed, and new policies are being proposed. All elements of the draft Local Plan are publicised for scrutiny and comment. A series of consultation questions are set out at the start of each topic chapter, and more detailed questions are set out after each Policy. These have been prepared to aid as a starting point for responses, but they are not designed to be exclusive or restrictive.
- 1.3 Once adopted, this Local Plan will replace the Crawley Borough Local Plan (2015 – 2030). It sets out the strategic priorities for Crawley and the planning policies to deliver:
- Homes and jobs
  - Provision of retail, leisure and other commercial development
  - Provision of infrastructure for transport, telecommunications, water supply, wastewater, flood risk management, and energy
  - Provision of community, social and cultural infrastructure and other local facilities
  - Climate change mitigation and adaptation
  - Conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure<sup>1</sup>
  - Control of Gatwick Airport.

### Current Stage of Consultation & Local Plan Timetable

- 1.4 This eight-week period of public consultation forms the “early engagement” stage of the preparation of Crawley's Local Plan. This seeks to consider the wide range of issues and opportunities associated with the future development and potential growth of Crawley over the next 15 years.
- 1.5 The consultation runs from **15 July 2019 until 5pm 16 September 2019.**

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<sup>1</sup> National Planning Policy Framework, paragraph 20 (2019) MHCLG

- 1.6 Responses should be provided in writing. This can either be in electronic format (via email to [forward.plans@ Crawley.gov.uk](mailto:forward.plans@ Crawley.gov.uk) or by post to:  
Strategic Planning  
Crawley Borough Council  
Town Hall  
The Boulevard  
RH10 1UZ
- 1.7 The council has prepared a questionnaire setting out high level questions designed to aid responses and gather opinions on the range of matters and issues covered by the Local Plan. This will be available for completion through the council's website eforms: [www.crawley.gov.uk/crawley2035](http://www.crawley.gov.uk/crawley2035) and in paper copies available at the Town Hall, Crawley Library and from a number of events taking place within the borough during the consultation period, at which the consultation will be promoted. You are invited to respond either directly to a particular question or to provide any comments or thoughts you may have on the document as a whole, a specific topic area, a policy or a paragraph.
- 1.8 Responses made on the council's social media pages (including the Local Plan Facebook page) will be collated as part of the consultation and will be responded to in accordance with the Local Plan processes.
- 1.9 This document is considered to be a draft Local Plan Review. It follows a review of the existing adopted Local Plan, and does not seek to start from a blank page. In many cases, the principles and policies of the Crawley Borough Local Plan 2015 remain up-to-date and 'sound'. Therefore, for some topic areas, progress is well advanced and there may be little change proposed to the current approach. For other areas, the review has provided the opportunity for proposing a change or a new approach to be considered.
- 1.10 Following the close of consultation, all responses received will be collated and considered by the council. Changes will be made, where appropriate, to the draft Local Plan. In addition to consultation responses, changes may come about due to the emerging technical evidence base. A final stage of formal public consultation will take place on the council's Submission Local Plan prior to it being submitted to the Secretary of State, for its independent examination.
- 1.11 The following timetable sets out details of the consultations and critical stages for the Local Plan's preparation.

Stage	Date
Early Engagement consultation	15 July 2019 – 16 September 2019
Publication (Submission) consultation	January – February 2020
Submission	March 2020
Examination in Public	July - September 2020
Adoption	December 2020

*Consultation Statement:*

1.12 Full details of this consultation can be seen in the draft Local Plan Consultation Statement.

### Preparation of Evidence Base

1.13 The review of the Crawley Borough Local Plan will be based on the results of technical studies and the views of residents, businesses, statutory consultees and other interested parties gathered through formal and informal stages of consultation.

#### Evidence Base

1.14 It is essential that, to meet the requirements set by national guidance, the Local Plan is underpinned by an adequate, up-to-date and relevant evidence base<sup>2</sup> about the economic, social and environmental characteristics, needs and prospects of the area. In light of this, new and updated studies are being carried out to ensure Crawley's Local Plan will reflect the locally distinctive issues, challenges, and opportunities, unique to the town. These include the following:

- **Deliverability of the Local Plan:** Sustainability Appraisal Scoping Report; and a draft Infrastructure Plan. Once the level, location and type of developments within the borough are known, a final Infrastructure Plan will be prepared. An updated Viability Assessment will be carried out following this stage of public consultation to consider the implications of the combined policy requirements on the deliverability of development.
- **Housing Needs:** Strategic Housing Market Assessment (SHMA); Strategic Housing Land Availability Assessment (SHLAA) and Housing Trajectory; At Crawley Study.
- **Employment Land Requirements:** Economic Growth Assessment (EGA); Employment Land Trajectory (ELT). A Retail and Leisure Assessment and Town Centre Neighbourhood Needs Study is being carried out.
- **Constraints and Assets:** Habitat Regulations Assessment Screening Report; Strategic Flood Risk Assessment (SFRA); Baseline Character Assessment; ASEQs and Locally Listed Buildings Heritage Assessment; Noise; Safeguarding; Built-Up Area Boundary; Landscape Character Assessment; Historic Parks & Gardens Review; Green Infrastructure Plan; Transport Modelling. The Playing Pitch Assessment, Indoor Sports Study and Open Space Study is under review. An updated Water Cycle Study is being commissioned.

1.15 More detail regarding the technical studies is included within the topic chapters, where appropriate, supporting the context and justification for the policies and a full list can be found at the end of this document. Additional evidence will be gathered as progress on the Local Plan continues. Those evidence base studies which have been completed are available alongside the Local Plan to support this consultation.

### Sustainability Appraisal

1.16 All Local Development Documents must be prepared with a view to contributing to the achievement of sustainable development<sup>3</sup>. The requirement for a Strategic Environmental Assessment (SEA) is originally set out in European legislation<sup>4</sup> which was adopted into UK law as the "Environmental Assessment of Plans and Programmes Regulations 2004". An SEA ensures that the environmental effects of certain plans and programmes, including land-use plans, are taken into account.

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<sup>2</sup> National Planning Policy Framework, paragraph 31 (2019) MHCLG

<sup>3</sup> Section 39 of the Planning and Compulsory Purchase Act 2004

<sup>4</sup> European Directive 2001/42/EC

- 1.17 The aim of the Sustainability Appraisal (SA) is to ensure that the Local Plan is as sustainable as possible. The process involves examining the likely effects of the Plan and considers how they contribute to environmental, social and economic wellbeing.
- 1.18 As the SA and SEA processes are so similar they will be undertaken together and for ease of reference, both processes are referred to as the Sustainability Appraisal.
- 1.19 A draft Sustainability Scoping Report to support the Local Plan Review has been produced. The draft Sustainability Objectives are set out in Appendix A of this document.

### Infrastructure Plan

- 1.20 Local planning authorities are expected to work with other authorities and providers to assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk management, and its ability to meet forecast demands.
- 1.21 Crawley Borough Council has produced a draft Infrastructure Plan which is supported by jointly agreed position statements with the key infrastructure and service providers within Crawley to confirm capacity to meet the needs of the growth of the town anticipated through the Local Plan and highlight any mitigation required.

### Local Plan Map

- 1.22 Development allocations and protection designations related to the policies and proposals within this draft Local Plan and in the West Sussex Minerals and Waste Plans are illustrated on the draft Local Plan Map. Any changes to the allocations and designations for sites within Crawley in policies established through future examination of these Plans will result in correlating updates being carried out to the Local Plan Map.

### Duty to Cooperate

- 1.23 The Duty to Cooperate<sup>5</sup> establishes a need to plan for cross-boundary strategic issues, and places a requirement on planning authorities to work together on such issues.
- 1.24 The Duty applies to all local planning authorities, national park authorities and county councils in England, and to a number of other public bodies. The Duty:
- relates to development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council;
  - requires that councils set out planning policies to address such issues;
  - requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies;
  - requires councils to consider joint approaches to plan making.
- 1.25 The NPPF provides further guidance on meeting the Duty to Co-operate in plan-making. Effective and on-going joint working should be demonstrated through the preparation and maintenance of Statements of Common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address them. These should be made publicly available throughout the plan-making process to provide transparency<sup>6</sup>.

<sup>5</sup> Section 110 of the Localism Act provides the legislative basis for the Duty by transposing it into a new Section 33a of the Planning & Compulsory Purchase Act 2004.

<sup>6</sup> National Planning Policy Framework, paragraph 27 (2019) MHCLG

- 1.26 The strategic issues relating to the future development of Crawley over the Local Plan period have been identified as including:
- Meeting housing needs
  - Economic growth
  - Gatwick Airport
  - Gypsy, Travellers and Travelling Showpeople
  - Key transport routes
  - Connectivity to Full Fibre Broadband
  - Low carbon economy
  - Flooding and flood risk.
- 1.27 These strategic issues are currently discussed beyond the borough's administration in the following forms:
- Individual discussions on a one-to-one basis with neighbouring authorities.
  - Meetings at a Northern West Sussex Authorities level, with Mid Sussex District Council and Horsham District Council; and commissioning joint evidence base such as the Strategic Housing Market Assessment, the Economic Growth Assessment.
  - Participating at a Gatwick Diamond level, with the Gatwick Diamond Authorities (crossing the County authority areas of West Sussex and Surrey). Jointly updating and signing up to the Gatwick Diamond Memorandum of Understanding and Local Strategic Statement.
  - Considering County-wide issues, through meeting with West Sussex and Greater Brighton Authorities at officer and member levels and participating in the preparations for a West Sussex and Greater Brighton Local Strategic Statement.
  - Involvement on a river basin management level in preparing the Brief for updating the Water Cycle Study evidence.
  - Meeting as Gatwick Airport Joint Local Authorities at officer and member level to share the current and future implications of Gatwick Airport operations.
  - Participating as a member of the Greater Brighton Economic Board.
- 1.28 Effective cooperation with neighbouring authorities is critical for Crawley because of its primary economic role in the sub-region and the wider economic and environmental implications relating to Gatwick Airport. Equally, cooperation is essential as, due to its compact size, tight borough boundary around the urban area, significant physical constraints such as flooding and Area of Outstanding Natural Beauty, and restrictions due to airport noise and safeguarding, Crawley cannot meet the housing and employment needs of its growing population within its own boundaries in full.
- 1.29 More detail on the Duty to Cooperate, the outcomes of joint working and the agreed series of Statements of Common Ground, and its influence on the Crawley Local Plan Review will be set out as part of the Local Plan supporting documents in due course.

## Monitoring & Review

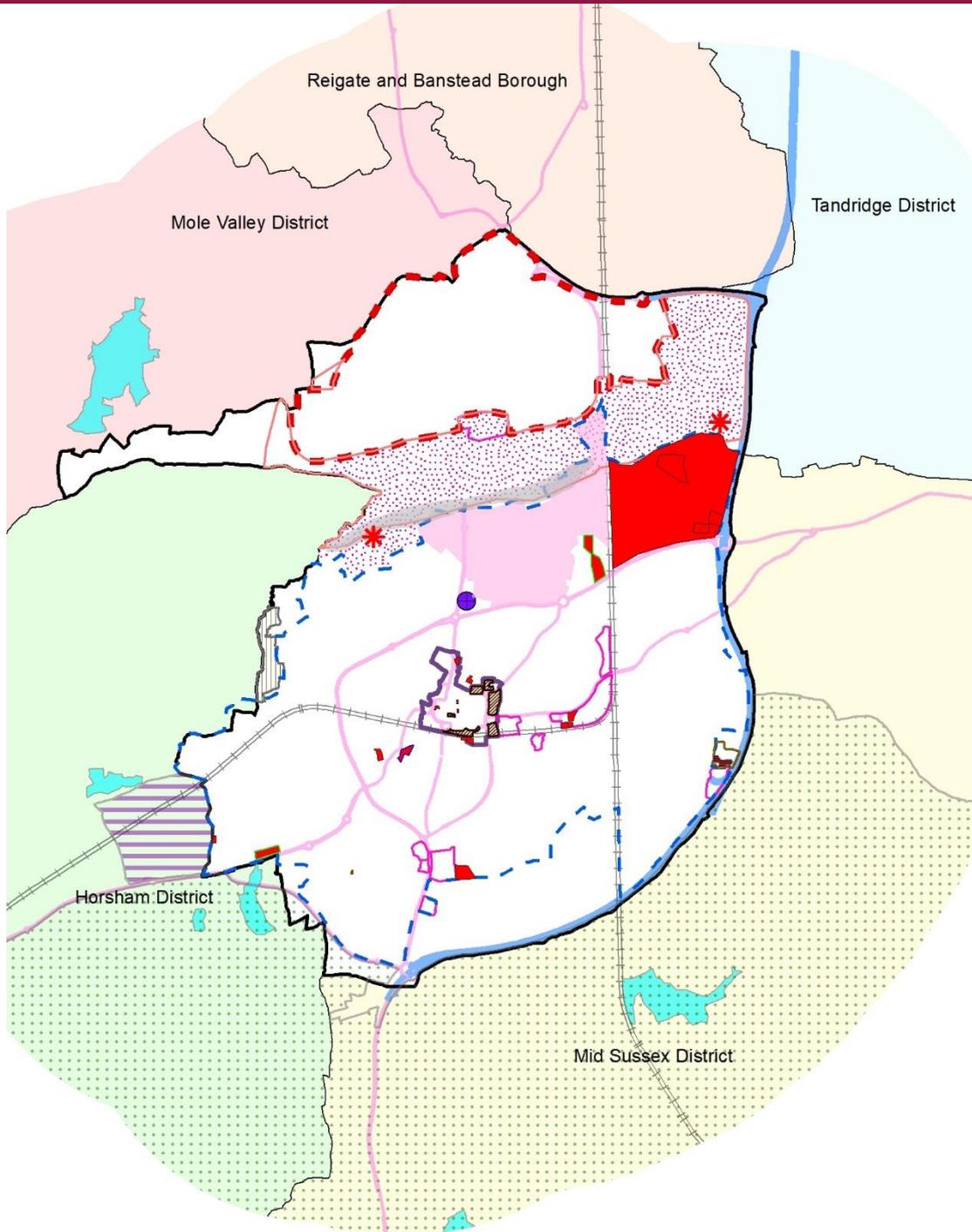
- 1.30 The draft Local Plan period will cover 15 years between the anticipated adoption year of 2020 and 2035. It will be prepared in order to be flexible and appropriate for ensuring delivery of sustainable development and economic growth throughout a range of economic and social cycles.
- 1.31 However, the Local Plan will be subject to continual monitoring to ensure the policies remain relevant and effective, and a review will be undertaken in 2025, at the latest, to ensure the Local Plan remains up-to-date, in accordance with the requirements of the NPPF. Should it be considered, at that stage, that a partial or full update of the

Plan is required, this will be reported in the Authority's Monitoring Report and the timetable for this process will be established by the council's adopted Local Development Scheme.

### Supporting Guidance Documents

- 1.32 Policies within the Local Plan refer to guidance relating to a range of topics that sit outside of the Plan. This guidance includes standards, benchmarking tools, principles or local and national policies. These have been listed in Appendix C to this draft Local Plan.
- 1.33 Over the Plan period it is anticipated that some of this guidance will be revised, replaced or deleted. When guidance:
- has been revised, the new version of the guidance should be used;
  - is replaced or new standards introduced, the new guidance or standard that is most similar to or, where justified by local circumstances, exceeds the existing requirements should be used;
  - is deleted and not replaced, the requirements of the deleted guidance should still be utilised unless it is seen by the council as no longer being relevant.
- 1.34 The council will provide up to date information on its website ([www.crawley.gov.uk](http://www.crawley.gov.uk)) to inform applicants of any changes to the policy requirements and which guidance should be used.

## Key Diagram



- |  |   |   |
|--|---|---|
| Local Authority Administrative Boundary              | Sites of Special Scientific Interest (Policy G3)                          | Main Employment Area (Policy EC2)                       |
| Key Housing Sites (Policy H2)                        | Local Green Space (Policy G14)  | Manor Royal (Policy EC2, EC9)                           |
| Indicative Key Housing Site (Policy H2)              | Built-Up Area Boundary (Policy LC5)                                       | Town Centre Boundary (Policy EC2, TC1-TC5, H2)          |
| Housing and Community Facilities (Policy H2)         | High Weald Area of Outstanding Natural Beauty (Policy LC6)                | Gatwick Airport Boundary (Policy EC2, GAT1, GAT3, GAT4) |
| Housing and Open Space (Policy H2)                   | Indicative Search Corridor for a Crawley Western Relief Road (Policy ST4) | Gatwick Safeguarded Land (Policy GAT2)                  |
| Housing for Older People (Policy H2)                 | A Road  | Area of Search for Future Employment Land (Policy EC1)  |
| Town Centre Key Opportunity Site (Policy TC3 and H2) | Motorway  | Area of Search - Future Housing (H1)                    |
| Biodiversity and Heritage Enhancements (Policy H2)   | Crawley Borough Boundary  | Broad Housing Locations (Policy H2)                     |
|  | Railway   | Kilnwood Vale (Joint Area Action Plan)                  |

# Crawley 2035: A Vision

Crawley will be a modern, vibrant, healthy and sustainable town that stands proud of its achievements and uses its strengths to reach its potential. Its strong and diverse communities, neighbourhood structure, sustainable economic growth and excellent connections within and beyond the region will make it a place that people enjoy and want to live, work and visit.

## Providing High Quality Leisure and Cultural Facilities and Supporting Health and Wellbeing Services: Wellbeing

*By 2035, Crawley will be a place that people want to visit, to have fun and spend their leisure time. As a town within a countryside setting that is very much valued by local people it will be safe and well cared for. The rich heritage which has shaped what the town is today will be respected, protected and enhanced. Local communities will be directly involved in planning how the town grows and develops in order to achieve the best outcome for all concerned; particularly where difficult choices have to be made.*

*Neighbourhoods will continue to offer local facilities alongside amenities that can be easily accessed along with informal green spaces for all to enjoy. The spirit and pride of individual communities will continue to be harnessed to make neighbourhoods the focus of local celebration.*

*People will be encouraged to stay physically and mentally fit and active, high standards of health care will be delivered locally and people will be able to age with confidence as they grow older. Crawley's parklands and open spaces, its sporting, and leisure facilities along with its cultural offer will be enhanced, for the benefit of local people and visitors.*

## Creating Stronger Communities: Diversity and Community

*Neighbourhoods will continue to feature in the development of the town, recognising the important role they play in helping shape and develop communities. Growth will be sustainable and supported by an infrastructure plan that complements development enabling people to live a long and happy life. All people who live here will be proud, confident and self-reliant, working together and with others for the good of the town.*

*Crawley will continue to improve the quality of life for its residents throughout every stage in their life. Excellent early years' provision will support children's development, which will be further assisted by the provision of good primary, secondary, further and higher education. Education, for both young and old, should unlock potential, giving people a real choice about what they do in their working life.*

## Improving Job Opportunities and Developing the Local Economy: Economic Growth & Social Mobility

*As a progressive town, Crawley will strive to be distinctive from other towns in West Sussex. It will be the premier town between London and the South Coast providing jobs, learning and development opportunities and a leisure and cultural offer that draws visitors from across the South East.*

*Crawley will continue to be an economic leader meeting the needs of significant employers who are important to the overall prosperity of the region. A business environment that supports and encourages new and established businesses to grow and flourish will be developed, and supporting necessary infrastructure, including telecommunications, will be enhanced.*

*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.*

*Redeveloping and revitalising the Town Centre and further regeneration of the Manor Royal Business District will make Crawley the place to do business in the South East. Sustainable growth of Gatwick Airport will continue to support the economic growth of the town.*

*The revitalised Town Centre will be the heart of the town, providing a central point for local people and others from across the region to enjoy social activities, shopping, culture and entertainment both during the day and at night. It will have a welcoming and attractive family friendly environment. The Town Centre will become a recognised neighbourhood with local facilities supporting its residents.*

## Delivering Housing to meet Needs and Affordable Homes for Crawley and Reducing Homelessness: Housing Delivery

*By 2035, about 4,800 new homes will have been built to support the needs of the growing population. A mix of new homes will be designed for residents in all stages of life. These will be built in locations which respect the town's unique development and design principles and preserve the most valued of the town's environmental features.*

## Protecting the Environment: Sustainability

*By 2035 significant progress will have been made towards Crawley becoming a carbon neutral town. Active travel and public transport will be significantly improved and supported by a strategic road network. Electric Vehicles will be promoted along with, and through, e-car clubs. A strong road network will be complemented by a good public transport system, giving people choice about how they travel. As a modern town, the technological and communication infrastructure will be in place to ensure residents and businesses have the support needed to develop and grow.*

*Conserving natural resources to support future growth will be vital to the longevity of the town. Air, noise and water pollution will be reduced. The borough will prepare for the increasing effects of climate change, through adaptation measures including lower water usage standards and delivering a net gain in biodiversity, including through pollination and connectivity measures, to address and mitigate against losses.*

## Crawley 2035

*Crawley will be a modern, vibrant, healthy and sustainable town that stands proud of its achievements and uses its strengths to reach its potential. Its strong and diverse communities, neighbourhood structure, sustainable economic growth and excellent connections within and beyond the region will make it a place that people enjoy and want to live, work and visit.*

- 2.1 Crawley stands unique alongside other towns in the sub-region. Located half way (20 miles to Brighton seafront and 20 miles to Croydon) between London and the south coast, it is a progressive and modern New Town that benefits from a historic past. It is an urban town which benefits from a countryside setting and a network of green spaces. This mix of old and new, built and natural has blended over the years to shape Crawley's distinct sense of place, and created a desirable offer for residents and businesses.

### Spatial Context

- 2.2 Crawley is situated in the north eastern part of the county of West Sussex. Horsham district abuts the town on the western side, Mid Sussex district is to the south and east whilst the county of Surrey lies to the north of the borough beyond Gatwick Airport.
- 2.3 Crawley borough covers 4,497 hectares. Its administrative boundaries are drawn tightly around the town itself, with very little land falling outside of the built up area. This is particularly the case to the west of the urban area, although this location offers some of Crawley's greatest connections, visual and physical, with the open countryside beyond. The M23 motorway forms the borough boundary to the east. To the south, beyond the dual carriageway, lies an Area of Outstanding Natural Beauty. Gatwick Airport is located within the borough to the north of the town – the land between the town and the airport is heavily constrained by noise and safeguarded for, potentially, the future development of the airport.
- 2.4 Migration patterns for Crawley show the strongest relationships with neighbouring areas of Mid Sussex and Horsham, followed by Reigate and Banstead, as well as having notable inflows from Croydon<sup>7</sup>. The Crawley Travel to Work Area extends to include Horley, Redhill, Leatherhead and Dorking (essentially extending north to the M25) as well as the main settlements in both Horsham and Mid Sussex<sup>8</sup>. These commuting patterns provide some indication of the role Crawley plays across this wider area in providing employment for significant numbers of people.

#### **Gatwick Diamond & Greater Brighton**

- 2.5 Reflecting Crawley's inter-relationship with its neighbours, links have been formed, both at a local authority and a business level, across an identified functional sub-region known as the Gatwick Diamond. Crawley is one of 7 Local Authority areas forming the Gatwick Diamond (along with Epsom and Ewell, Horsham, Mid Sussex, Mole Valley, Reigate & Banstead and Tandridge), which crosses the Surrey and West Sussex County boundary. Whilst this is an area that does not have any official boundaries, the Diamond extends over a range of towns and villages, set in attractive countryside, stretching from the southern edge of London to the northern boundaries

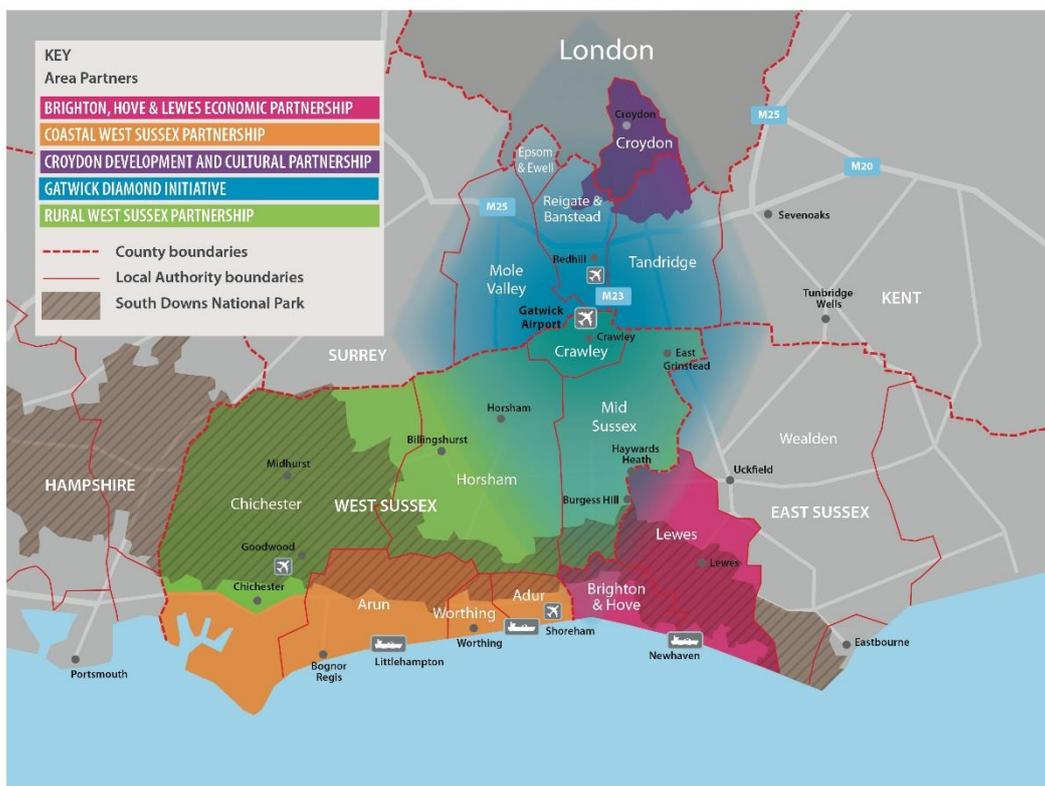
<sup>7</sup> ONS (2014) based on 2011 Census data.

<sup>8</sup> 2011 Census/ONS analysis (2014)

of Brighton and Hove, and forming the central element of the Coast to Capital Local Enterprise Partnership (LEP) area.

- 2.6 The LEP’s Strategic Economic Plan identifies the borough of Crawley and north of Horsham as the: “Heart of the Gatwick Diamond” and as one of its spatial priorities for growth.

## Coast to Capital Area Local Partnerships



**Fig 1: Crawley in the Context of the Gatwick Diamond Sub-Regional Functional Area & Coast to Capital Local Enterprise Partnership Area<sup>9</sup>**

- 2.7 Much of Crawley’s development opportunities and pressures are determined by its role within the Diamond and the wider economic sub-region. With Gatwick Airport as the economic core, the borough offers the focus for large businesses, travel and retail provision. It is supported in this role by the neighbouring districts within the wider area; each of which provide complementary offers in terms of housing, employment and leisure.
- 2.8 Crawley has recently joined the Greater Brighton Economic Board, and the West Sussex and Greater Brighton Strategic Planning Board. This recognises the increasing importance of strategic working across the wider LEP area in order to maximise benefits and secure mutually advantageous economic and social outcomes as well as address the significant challenges faced by the area.
- 2.9 This wider sub-regional role for Crawley offers both opportunities and challenges, and the Local Plan ensures that Crawley’s strategic responsibilities will be supported, whilst recognising the physical constraints that mean the town’s anticipated housing and employment needs cannot solely be met within its own administrative boundaries, particularly given the current airport safeguarding parameters.

<sup>9</sup> Coast to Capital Strategic Economic Plan (2014) Coast to Capital Local Enterprise Partnership

### ***A New Town in a countryside setting***

- 2.10 Crawley was designated a New Town in 1947 and incorporated the settlements of Crawley, Ifield and Three Bridges. As a planned New Town, it was organised and designed around a neighbourhood structure. Laid out according to twentieth century quality of life and sustainable development principles, Crawley has subsequently grown beyond the original masterplan and many elements of the original New Town now form an important part of the town's history.
- 2.11 The masterplan phased the development of the town through the addition of complete neighbourhoods, each with good access to its own centre offering a mix of uses to serve local needs. The relatively small size of each neighbourhood was intended to help build up the new communities, achieve closer integration and provide greater accessibility to the neighbourhood centres. In 2035, the principle of the neighbourhoods will remain a characteristic of the town, and neighbourhood centres will continue to play an important role as a focal point for community facilities and local shopping.
- 2.12 Crawley's urban and landscape structure consists of a number of distinct character components:
- The Economic Centres (Crawley Town Centre, Manor Royal and Gatwick);
  - The Historic Town of Crawley (the pre-'New Town' Crawley: including Medieval, Late Victorian, Edwardian. Forming the area stretching from and including Goffs Park/Ifield Road/St. Peters, east to and including the historic High Street area and Alms Houses and south to include Brighton Road and Malthouse Road);
  - The Historic Villages (Ifield, Worth, Three Bridges);
  - The 1950s-70s 'New Town' Neighbourhoods;
  - The sylvan or wooded suburbs;
  - The places connected to open countryside (visually and physically) (wider Ifield along Rusper Road, beside Tilgate Park, Worth Village);
  - Areas of Open Parkland, Countryside and Meadows (Tilgate, Ifield Meadows, north of Manor Royal, Langley Green and Pound Hill/Forge Wood, Pease Pottage and the High Weald Area of Outstanding Natural Beauty).
- 2.13 The management of change is necessary so as not to unduly restrict growth whilst retaining the valued features of the town. This will be achieved through the assessment of the character of the borough, the protection and enhancement of important and positive assets, improvements to areas with significant negative features and the delivery of high quality development that takes full account of its context.
- 2.14 The Local Plan Review continues to ensure the protection of other valued features of the natural and built environment, both within and around the town. New development will provide high quality environments and will be of a high standard of design and sustainable construction. The character of the countryside surrounding the town will be protected through the Local Plan by policies which set out the considerations for the land beyond the built-up area boundary.

### ***A working town***

- 2.15 Crawley is the largest economic centre in the Northern West Sussex area<sup>10</sup>, and also the largest economic area of the Gatwick Diamond representing a significant proportion of its total commercial floorspace and employment. Employment levels are high in Crawley with total employment in the town being around 100,000 jobs. While Crawley boasts average salaries that are among the highest of the Gatwick Diamond, many residents are employed in low skilled industries, and it is recognised that on average people who travel into Crawley for work earn more than local people.

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<sup>10</sup> i.e. that covering Crawley Borough, Horsham and Mid Sussex Districts

Crawley's resident workforce has a lower than average level of Qualifications at NVQ4 and above (36.9%) when compared to the South East region (42.2%) and Great Britain (39.3%) as a whole and many firms are concerned about skill shortages. Unemployment in Crawley has been historically low and is currently at 3.8% a figure which is still though higher than surrounding areas and low levels of available staff (as indicated by low levels of unemployment in Crawley and surrounding areas) can create tight labour market conditions. Through the Crawley Employment and Skills Programme 2019-2024, positive steps are now being made to address the skills gap and help Crawley residents to better access employment.

- 2.16 Reflecting this critical role for both Crawley and beyond, the Local Plan seeks to ensure economic growth is achieved through the consolidation and enhancement of the existing employment areas.

## **The Economic Centres**

### Manor Royal

- 2.17 Manor Royal is one of the largest business parks in the south east covering a total of 240 hectares and is home to more than 600 businesses and over 32,000 jobs – which accounts for 40% of Crawley's total employment. It provides 77% of Crawley's employment land; 19% of employment land in West Sussex; and 22% of employment land in the Gatwick Diamond. Since its official naming in 1950, Manor Royal has evolved and diversified its employment offer from its traditional manufacturing base of 60 years ago. Its notable size, scale and varied business base combined with a number of available development sites represent opportunities for intensifying the use of existing land in support of Crawley's economic development.

### Crawley Town Centre

- 2.18 The Town Centre is a key component of Crawley's economic role in the sub-region, and therefore plays a critical part in the Local Plan's development strategy. It is a sustainable location for major retail, office and leisure related developments consistent with typical town centre uses attracting large numbers of people, and for a mix of uses including housing. With a growing residential population, the Town Centre is increasingly becoming a neighbourhood in its own right, requiring supporting facilities and services to meet the needs of the people that live there. The Town Centre will be enhanced through new commercial, community and residential developments that will ensure its viability and vitality is enhanced, helping strengthen its local and sub-regional role.

### Gatwick Airport

- 2.19 The economy of Crawley, and the wider Gatwick Diamond area, is buoyed by the presence of Gatwick Airport. 75% of Crawley's employment (by employment numbers) is in distribution, hotels, transport, communications, banking and finance of which Gatwick Airport accounts for approximately 25,000 jobs directly. Crawley is the main place of residence for airport employees with 26.9% of the workforce living in Crawley.

### ***Meeting housing needs***

- 2.20 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 2035, to meet the needs of its growing population, the town would need a further 11,281<sup>11</sup> 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.

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<sup>11</sup> For the period from 2020 to 2035: 752 dwellings per annum x 15 years, based on the Standard Methodology Figure 2014-based Household Projections, calculated June 2019.

- 2.21 Crawley's population profile is very different to most neighbouring areas and this places its own special demands upon the local economy and local services. The population reached 106,600 in 2011 (an increase of about 22% since 1991) and stands at 111,700 residents currently (2017/18). Crawley has a greater proportion of younger people (between the ages of 25 and 34) and a lower percentage of elderly, compared with the rest of the South East; with about two-thirds of Crawley's population less than 45 years of age. However, future demographic change particularly as the younger population have families will intensify demands upon the need for housing, along with social, community, leisure, educational and retail facilities. This is in clear contrast with the demographic challenges faced by many neighbouring districts. Furthermore, the aging population is increasing at a disproportionately faster rate than other age groups, with growth of 65 years and over population accounting for 61% of the total projected change.
- 2.22 In line with national guidance, sufficient market and affordable housing should be provided to meet the needs of existing and future households across the housing market area as well as to provide an appropriate amount to sustain the local economy. However, this must be reconciled with the other priorities in the draft Local Plan, particularly those with regards to protection and enhancement of the built and natural environment, and meeting the objectives for future economic growth. The confined boundaries of the borough and the scarcity of land without physical and policy constraints makes the need to balance and plan for any growth particularly challenging.

#### Identification of Housing Sites in Crawley

- 2.23 Crawley's identified land supply allows for approximately 43% of its housing needs to be met through new housing developments within the borough boundaries. Most of this is to be delivered through the new Forge Wood neighbourhood in the north east of the borough, and through residential development in the town centre<sup>12</sup>, with the remainder coming forward on a number of smaller sites within existing neighbourhoods.
- 2.24 Within the borough, the identification of housing sites has required consideration of all competing land use needs including open space and employment to ensure an appropriate balance has been struck in delivering sustainable development.
- 2.25 All sites, small/medium up to entire new neighbourhoods, contribute towards meeting housing requirements in Crawley, particularly as the land supply available within the administrative and urban boundaries of the town is becoming increasingly constrained. Nevertheless, as a New Town with a large stock of modern and generally well-designed and laid out housing, precedence for maintaining this standard has been set. All new housing and surroundings should be suitable in terms of size, design and facilities for the requirements of its occupants and should not lead to environmental and amenity problems.

#### Crawley's Unmet Housing Needs

- 2.26 The scale of unmet need of approximately 6,475 dwellings over the Plan period is fully acknowledged and is being discussed with neighbouring authorities in a constructive and effective manner, including across the Gatwick Diamond and West Sussex and Greater Brighton.
- 2.27 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

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<sup>12</sup> A total of 3,852 dwellings to come forward within Forge Wood and the Town Centre combined (1,647 in Forge Wood + 2,205 in the town centre) out of the total net supply 4,806 = 80%

Borough to a lesser degree. Taken as a whole, the towns within the Northern West Sussex Housing Market Area provide a complementary role, offering housing opportunities for the local population and workforce for each stage and socio-economic position within lifecycles, and providing housing for employees working at Gatwick Airport and Manor Royal. This highlights a critical inter-dependence and reliance between areas with regard to housing and economic growth.

- 2.28 In the preparation of the adopted Crawley Borough Local Plan 2015, it was recognised by the authorities across the Northern West Sussex Housing Market Area that Crawley had sought to fully maximise its capacity for housing development within the borough boundaries in order to meet its own housing needs<sup>13</sup>. Similarly, each authority within the area considers it is doing the maximum reasonable to meet the objectively assessed housing needs of the area as a whole, taking into account local constraints, local aspirations and the need for sustainable development<sup>14</sup>. Further acknowledgement is provided within the adopted Development Plans for Horsham, Mid Sussex and Reigate and Banstead: with recognition that their housing provision figures will contribute to meeting the wider needs of the Northern West Sussex Housing Market Area and supporting the delivery of economic growth within the Gatwick Diamond<sup>15</sup>.
- 2.29 However, the increase in projected annual household growth through the Standard Method (which includes 40% uplift for addressing affordability), and the additional five years beyond the adopted Plan period (2030 – 2035) has increased the amount of unmet need to be addressed by the Local Plan Review. This is acknowledged to be increasingly challenging for the Housing Market Area, as the need figures for Mid Sussex and Horsham districts using the Standard Method are also significantly increasing, without including any additional amount to meet Crawley’s unmet needs (see table below).

	Crawley	Horsham	Mid Sussex	NWS HMA total
Existing Local Plan Objectively Assessed Housing Needs	675dpa	650dpa	876dpa	2,201dpa
Existing Local Plan Requirements	340dpa	800dpa	964dpa	2,104dpa
Standard Method Requirement <sup>16</sup>	752dpa	965dpa	1,102dpa	2,819dpa

#### Development adjacent to Crawley

- 2.30 Delivery of homes in new neighbourhoods in close proximity to Crawley is an appropriate way to meet the needs of the emerging households from within the existing population, and joint working has been long established in recognition of this. This has included the Joint Area Action Plan prepared and adopted by Crawley Borough and Horsham District Councils in 2009 for West of Bewbush which is seeing the current delivery of the new Kilnwood Vale neighbourhood, immediately adjacent to Crawley’s boundary whilst being located wholly within Horsham District. The identification of a Strategic Development Location to the West and North West of Crawley for 2,500 homes was set out in the West Sussex Structure Plan. Kilnwood

<sup>13</sup> Northern West Sussex Authorities Position Statement, paragraph 6.13 (September 2013), Crawley Borough Council, Horsham District Council and Mid Sussex District Council

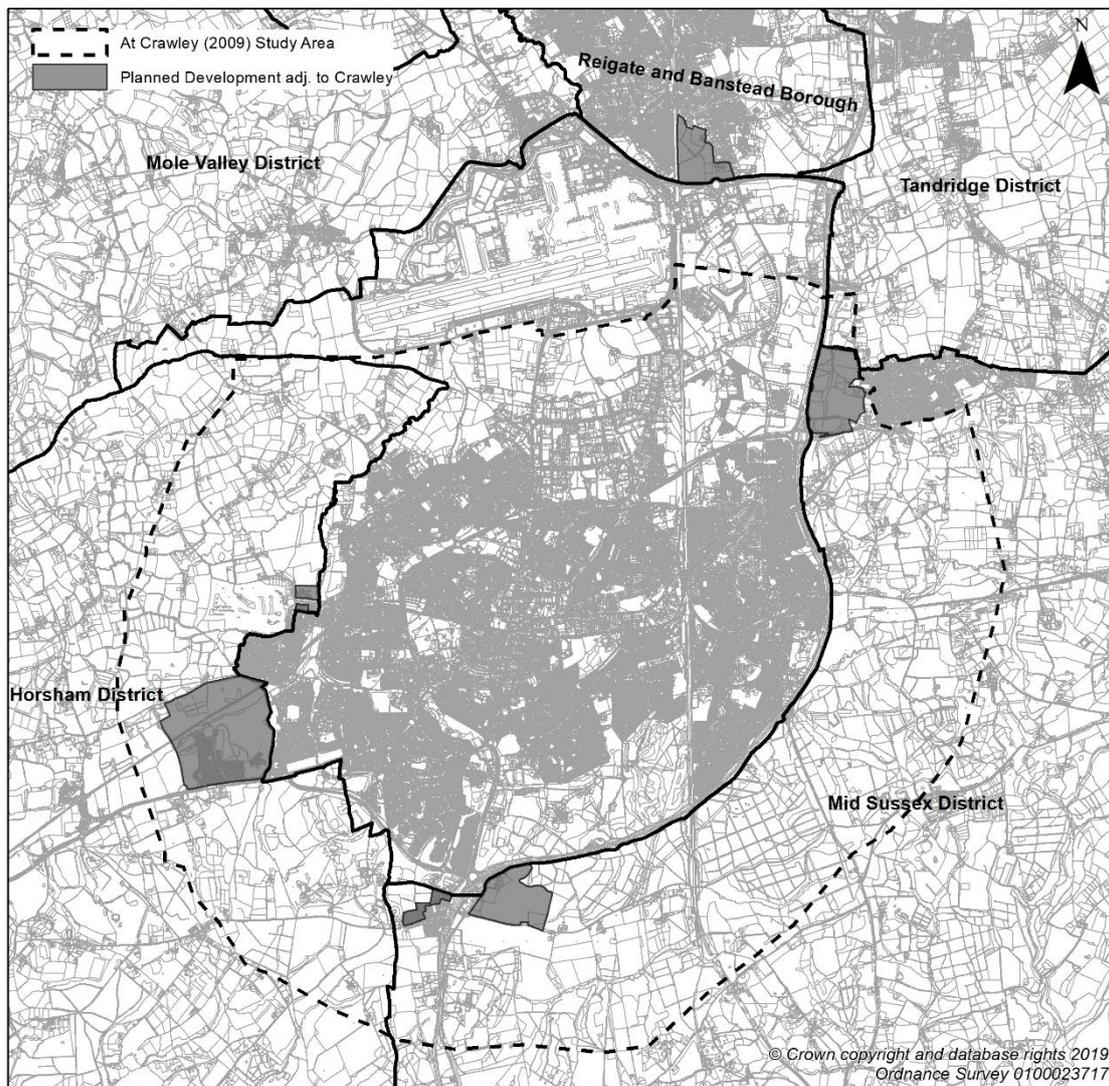
<sup>14</sup> Northern West Sussex Authorities Position Statement, paragraph 6.21 (February 2015), Crawley Borough Council, Horsham District Council and Mid Sussex District Council

<sup>15</sup> Reigate and Banstead Core Strategy, paragraph 7.4.1 – 7.4.4 (2013) Reigate and Banstead Borough Council; Horsham District Planning Framework, paragraph 6.3 (November 2015) Horsham District Council; Mid Sussex District Plan 2014 – 2031, Policy DP4: Housing, second paragraph, page 30, and Policy DP5: Planning to Meet Future Housing Need, pages 33-34 (March 2018) Mid Sussex District Council

<sup>16</sup> 2014-based Household Projections; affordability ratio ONS 2018

Vale was subsequently determined as the most appropriate location to take forward following detailed assessments of the opportunities and constraints for providing a new neighbourhood and development potential around all of Crawley's boundaries<sup>17</sup>.

- 2.31 In addition to Kilnwood Vale, the new neighbourhood within Crawley's administrative boundaries (Forge Wood) and the new neighbourhood level extensions to Horley (within Reigate and Banstead administrative boundaries) are being progressed. Further significant level of development is permitted, and taking place, to the east of Crawley's administrative boundaries at land west of Copthorne, to the west along Rusper Road and to the south, in the Area of Outstanding Natural Beauty, at Pease Pottage.
- 2.32 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. The 2009 At Crawley study area, along with the development coming forward adjacent to the borough's administrative boundary, is shown on the Plan below.



<sup>17</sup> At Crawley Study (2009) GL Hearn

### ***Environmental sustainability***

- 2.33 Crawley borough has some unique characteristics and opportunities that enable the delivery of a clear approach to mitigation against, and adapting for a changing climate, whilst positively embracing the town's ambitious target of being carbon neutral by 2050. This uniqueness arises from the density of the urban area, the level of anticipated development and the clearly identifiable opportunity areas such as the Manor Royal business district, the town centre redevelopment areas and Gatwick Airport. Furthermore, the borough is identified as an area of high radiant energy and subject to serious water stress.
- 2.34 As a result of this, there are several areas where the planning system can build upon nationally described standards to ensure that the borough's potential to adapt and mitigate against the effects of climate change is maximised. These are fundamental to the priority objectives for Crawley to 2035 and to the most significant elements of the town's locally distinctive context.
- 2.35 The priority areas are:
1. Ensuring new buildings are low carbon
  2. Bringing forward district energy networks
  3. Combating serious water stress
  4. Promoting public transport and active travel

### ***Accessible transportation links***

- 2.36 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. The town itself is served by a rapid guided bus service: Fastway, and a network of green corridors, providing attractive pedestrian and cycle routes through the neighbourhoods and into the town centre and out into the countryside. The National Cycle Route 21, from Greenwich to Eastbourne and forming part of the "Avenue Verte" Greenway, linking London to Paris, also runs through the borough.
- 2.37 Attractive and effective public transport is essential in order to facilitate and encourage a shift to sustainable modes of transport. In order to make effective use of land, 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. Together with promoting active travel, cycling and walking, this 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.
- 2.38 All new development will 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, in order to encourage a viable and attractive alternative to car use, both for commuters, residents and visitors.

## **Planning Policy Context**

### **National Planning Policy Framework**

- 2.39 The National Planning Policy Framework (NPPF) sets the planning policies for England and confirms that the purpose of the planning system is to contribute to the achievement of sustainable development.

### **Gatwick Diamond Local Strategic Statement**

- 2.40 The Gatwick Diamond Local Strategic Statement (LSS) has been updated in 2016/17 on behalf of the six Districts, and both of the County Councils, building on the joint working over recent years. The LSS seeks to provide a consistent strategic direction for the Gatwick Diamond area, shaping a sustainable future; set out how that strategic direction will be translated into change and development; establish effective mechanisms for inter-authority cooperation on strategic issues so that longer term decisions made through the plan making processes are fully informed; and identify priority themes for joint working.
- 2.41 The Statement is structured around six priority themes:
1. Achieving a Sustainable Economy and Prosperity including Supporting Low Carbon Growth;
  2. Investing in Urban and Rural Centres;
  3. Delivering a Choice and Mix of Homes;
  4. Education and Skills;
  5. Infrastructure; and
  6. High Quality Natural Environment, Countryside and Landscape.

### **Crawley Economic and Regeneration Programmes**

- 2.42 Located at the heart of the Gatwick Diamond, Crawley is the major economic driver for the region. Through its Economic and Regeneration Programmes, the ambition is to create a dynamic business growth hub with a bold and vibrant community heart for Crawley and the Gatwick Diamond, driving a diverse retail and leisure offer, excellent public realm, sustainable transport infrastructure, high quality town centre living and a thriving evening economy.
- 2.43 Through the Crawley Growth Programme, an investment package of £31.412 million has been secured, funded by the Coast to Capital Local Enterprise Partnership (LEP), West Sussex County Council and Crawley Borough Council. This will deliver a range of infrastructure improvements and physical regeneration in the town centre, Manor Royal and Gatwick, designed to support significant increases in new homes, business investment and employment growth. The whole programme will deliver 7,000 new jobs, 135,000 square metres of refurbished commercial floor space and 1,000 new homes. Forming part of this work, the Town Centre Regeneration Programme has secured £18 million investment from the Coast to Capital LEP and has already delivered significant improvements to Queens Square and Queensway, with further investment to come through regeneration at Station Gateway and Eastern Gateway. Significant work is also being undertaken through the Crawley Employment and Skills Programme (2019-2024), focused on bridging the local skills gaps by working with partners to create the right conditions for career opportunities within the borough.

### **Carbon Neutral Commitment**

- 2.44 The Crawley Carbon and Waste Reduction Strategy (adopted 2012) aims to make Crawley carbon neutral and zero waste by 2050, by focusing on the council:
- being a role model for sustainability within its own buildings and in its service delivery; and
  - working in partnership to help residents and other organisations to limit their own carbon emissions and waste.
- 2.45 The key strategic objectives and aims which are related to the planning system and the priorities and policies in the Local Plan are as follows:
- Low carbon, decentralised energy network for the town:
    - work in partnership with energy service companies, property owners and other partners with the aim of delivering combined heat and power schemes where possible.

- Promote sustainable housing and transport within Crawley:
  - Investigate opportunities, in partnership with West Sussex County Council;
  - Set an example with our own social housing stock;
  - Significantly increase the number of residents cycling.

### **Neighbourhood Plans**

2.46 Currently there are no neighbourhood plans within the borough, but the council is working closely with neighbourhood forums and other groups, and is offering support if any wish to bring forward a neighbourhood plan.

## Sustainable Development

### Presumption in Favour of Sustainable Development

3.1 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development<sup>18</sup>, and sets out the planning system's role in supporting the three dimensions of sustainable development:

- **An economic objective:** to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- **A social objective:** to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- **An environmental objective:** to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

### Strategic Policy SD1: Presumption in Favour of Sustainable Development

In line with the planned approach to Crawley as a new town, and the spatial patterns relating to the neighbourhood principles, when considering development proposals the council will take a positive approach to approving development which is sustainable.

The council will work proactively in partnership with applicants, stakeholders and other partners to jointly find solutions which mean that development can be approved wherever possible, whilst securing development that improves the economic, social and environmental conditions of Crawley and the wider Gatwick Diamond and West Sussex and Greater Brighton sub regions.

Development will be supported where it meets the following strategic objectives:

1. Progress towards Crawley's commitment to being carbon neutral by 2050 and adapts to climate change;
2. Complements Crawley's character as a compact town within a countryside setting, developed on a neighbourhood principle and maximises the use of sustainable travel;
3. Respects the heritage of the borough;
4. Protects, enhances and creates opportunities for Crawley's unique Green Infrastructure;
5. Provides a safe and secure environment for its residents and visitors;
6. Provides for decent and affordable homes and meets the social and economic needs of Crawley's current and future population; and
7. Accords with the policies and objectives set out in this Plan unless material considerations indicate otherwise.

<sup>18</sup> National Planning Policy Framework, paragraph 6 (2012) DCLG

### **Reasoned Justification:**

- 3.2 *Taken as a whole, the principles and policies set out in this Local Plan for Crawley will deliver the sustainable development of the town and will guide development proposals to meet the long-term vision as well as maximising short-term benefits. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that guide how the presumption should be applied locally.*
- 3.3 *This must be achieved having regard to the limited availability of developable land in Crawley, which is a result of the borough's tight administrative borough boundary and the requirement to safeguard a significant amount of land within the north of the borough for a possible additional runway. This means that the Local Plan must strike a considered balance between conflicting demands to meet Crawley's significant housing, employment, and open space needs in a sustainable manner. To ensure this is the case, Policy SD1 provides the overarching principles on meeting the presumption in favour of sustainable development.*
- 3.4 *In accordance with the NPPF, the presumption in favour of sustainable development applies unless specific policies indicate development should be restricted. Those sites with strongest weight against development<sup>19</sup> will include land designated as Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets (including Listed Buildings, Conservation Areas, Scheduled Ancient Monuments and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to scheduled monuments), locations at risk of flooding and irreplaceable habitats, such as areas of Ancient Woodland and ancient and aged trees<sup>20</sup>. Other constraints which have been locally assessed within Crawley include areas subject to unacceptable levels of noise, particularly from aircraft; historic parks and gardens; Sites of Nature Conservation Importance; structural landscaping; and open space which has not been identified as surplus to open space requirements. Development within these locations will be considered carefully against the reasons for their designation and will only be approved if mitigation measures can adequately reduce the negative impacts of development.*
- 3.5 *To ensure development is truly sustainable and supports the needs of economic growth within such a constrained and tightly drawn urban borough, it is essential for Crawley to be considered in its wider geographical context, including its housing market and travel to work areas, rather than restricted to its administrative boundaries, and for continued cooperative working to ensure the most appropriate balance is struck. As part of this commitment, the review of the Gatwick Diamond Local Strategic Statement to understand the emerging future needs of London and the Coastal Sussex areas, will ensure development within Crawley contributes to the wider priorities of the area and helps to deliver the necessary sustainable economic growth.*

### **Enabling Healthy Lifestyles and Wellbeing**

- 3.6 *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. To aid understanding of the built and natural environment and health, researchers<sup>21</sup> have devised the Health Map*

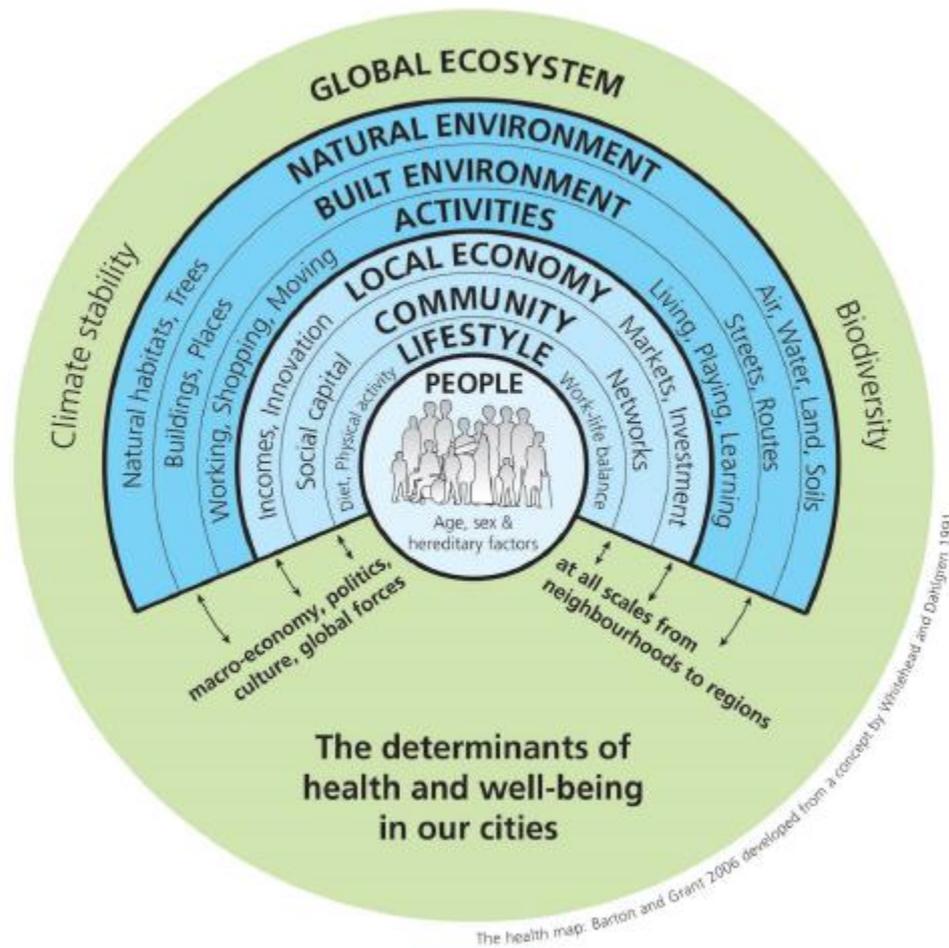
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<sup>19</sup> National Planning Policy Framework, paragraph 11 and footnote 6 (2019) MHCLG

<sup>20</sup> National Planning Policy Framework, glossary definition "Irreplaceable habitat", page 67-68 (2019) MHCLG

<sup>21</sup> Barton and Grant (2006), drawing upon the work of Dahlgren and Whitehead (1991)

(Figure 1). The map is focused on the role of neighbourhood and planning, and emphasises the importance of the built and natural environment's contribution to health and wellbeing outcomes, in line with the socio-ecological approach to health (Orme et al., 2010).



- 3.7 Therefore, planning for health involves thinking about the interrelated factors that affect health, including social and psychological elements, such as wellbeing and fulfilment. The wider determinants of health are conditions in which people are born, grow, work, live and age, and the wider set of forces and systems shaping the conditions of daily life. A healthy place is one that can contribute to the prevention of ill health and provide the environmental conditions to support positive health and wellbeing.
- 3.8 When considering the health impact of individual developments, it is important that its surroundings are taken into account as well as its intended purpose. This includes looking at population health as a whole. It also involves the examination of population groups, vulnerable communities and sensitive uses, such as residential care homes, supported housing, schools, hospitals and health centres.
- 3.9 Public Health England has noted that “Some of the UK’s most pressing health challenges – such as obesity, mental health issues, physical inactivity and the needs of an ageing population – can all be influenced by the quality of our built and natural environment”. The considerate design of spaces and places can help to promote good health by providing:
  - **Healthy lifestyles:** places to access good diet, nutrition, opportunities to breastfeed, take part in physical activity minimise risk taking and addictive behaviour such as gambling, alcohol and smoking

- **Positive social and community influences on health:** community cohesion, community power, identity and local pride, community resilience, neighbourliness, sense of belonging, community connectivity and inclusiveness, social networks and support.
- **Good mental health and wellbeing:** facilitating a sense of control, enabling participation in the community and economic life, access to green open spaces and water bodies, and accessibility to social opportunities
- **Safe and healthy living environmental conditions:** air quality, attractiveness of area, noise control, dementia friendly communities and homes, social inclusion, community safety, accessibility, housing quality and tenure, home safety and safety of public spaces, adaptable dwellings
- **Economic conditions that affect and promote health:** employment opportunities, availability to food and fuel, income, economic activity and good working conditions such as those related to health and safety
- **Access and quality of services:** access to leisure services, information technology, medical and health services, education and training, public amenities, shops and commercial services, sustainable transport (including parking, public transport and active travel)
- **Positive macro-economic, environmental and sustainability factors:** biodiversity, mitigating climate change (i.e. flooding, heatwave), sustainable development principles (integration; collaboration; involvement; long term thinking; and prevention) and regeneration for example.

### Strategic Policy SD2: Enabling Healthy Lifestyles and Wellbeing

New development must be designed to achieve healthy, inclusive and safe places, which enable and support healthy lifestyles and address health and wellbeing needs in Crawley, as identified in the Crawley Joint Strategic Needs Assessment.

In order to maximise opportunities to enable healthy lifestyles, new development must:

- Meet the principles of good urban design and support Crawley's status as a Dementia-Friendly Town, through ensuring legibility of layout, materials and design (Policies CD2 and CD5);
- Meet the needs of all through the use of the highest standards of accessible and inclusive design (Policy CD10);
- Provide opportunities for open space, play and recreation (Policies OS1 – OS2);
- Promote the use of accessible and reliable sustainable transport and encourage greater levels of safe and attractive opportunities for active travel (Policies OS3, ST1 – ST2);
- Be supported by, and not result in a loss of, necessary infrastructure provision (Policies IN1 – IN2); and
- Ensure proposals are safe for future site users and do not result in unacceptable harmful impacts (Policies EP1 – EP5).

Major developments must set out how they address the requirements of Policy SD2 as part of the planning application. In order to satisfy this policy requirement, a Health Impact Assessment must be included with qualifying planning applications, as set out in the Local List of Requirements, at the point of submission for validation purposes.

#### **Reasoned Justification**

3.10 *National planning policy confirms that planning policies and decisions should aim to achieve healthy, inclusive and safe places which: promote social interaction,*

*including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy and safe pedestrian and cycle connections within and between neighbourhoods, and active street frontages<sup>22</sup>.*

- 3.11 *To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*
- *Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments<sup>23</sup>;*
  - *Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*
  - *Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.*
- 3.12 *The Health and Social Care Act (2012) sets out local authorities' new duties and responsibilities for health improvement and health protection. The Act requires every local authority to use the levers at its disposal to improve health and wellbeing. Through the Sustainability Appraisal, the health impacts of the Local Plan are assessed against the identified issues. The benefits and outcomes of the implementation of the Plan will be monitored annually against these indicators through the Authority's Monitoring Report.*
- 3.13 *Planning for health involves thinking about the interrelated factors that affect health, including social and psychological elements, such as wellbeing and fulfilment. The wider determinants of health are conditions in which people are born, grow, work, live and age, and the wider set of forces and systems shaping the conditions of daily life. A healthy place is one that can contribute to the prevention of ill health and provide the environmental conditions to support positive health and wellbeing.*
- 3.14 *The West Sussex Joint Strategic Needs Assessment (JSNA) "People and Places" for Crawley (2019)<sup>24</sup>, highlighted the following characteristics to consider:*
- *There has been a 10% increase in residents since 2007, due both to more births than deaths and inward migration;*
  - *133,425 people were registered with Crawley CCG GP practices in 2017/18 (more than the 111,700 total residents within the borough);*
  - *The resident population has a younger profile compared with England with 22% aged 0-15 years and only 13% aged 65+ years, although the numbers are increasing;*
  - *28% of the local population were from black and minority ethnic (BAME) groups at the time of the last census (2011), higher than England;*
  - *83.3% of the adult population are economically active (2017-2018) and the borough has a very high ratio of private sector jobs to public sector jobs;*
  - *Deaths (under 75 years) from cardiovascular disease have fallen over the last 10 years, although the rate of decline has slowed in recent years.*
- 3.15 *The West Sussex Joint Strategic Needs Assessment (JSNA) highlighted the following health challenges for Crawley:*
- *There are 14,900 people aged 65+, a number which is increasing more quickly now;*
  - *The rate of violent crime in Crawley has increased in the last 5 years;*

<sup>22</sup> NPPF 2019, p27, paragraph 91 a)

<sup>23</sup> NPPF 2019, p27, paragraph 92 a), b), c)

<sup>24</sup> <https://jsna.westsussex.gov.uk/updates/west-sussex-jsna-summary-2018/>

- *Life expectancy has increased but considerable inequalities persist, with a notable gap between the richest and poorest particularly in relation to men. Life expectancy is lower for people with mental health problems and for people with learning disabilities;*
  - *Approximately 18% of Year 6 pupils (10/11 year olds) are obese;*
  - *In 2016/17 62% of adults were estimated to be physically active (doing 150 minutes of moderate intensive exercise per week) and 24% physically inactive (<30 minutes of moderate intensive activity).*
- 3.16 *Proposals should consider and reflect the expectations of the West Sussex Joint Health and Wellbeing Strategy and the Sustainability Transformation Plans published by Crawley's local NHS/CCG partnership.*
- 3.17 *Health Impact Assessments (HIA) and screening should be undertaken for all major applications and developments likely to give rise to significant health impacts. This should draw together the health benefits of the other application submission documents, including the design and access statement, design code, transport assessment and travel plan. This will allow schemes to be refined to maximise positive effects on health and wellbeing. Proposals should draw on good examples of best practice elsewhere, including, for example, healthy new towns, garden villages and communities, obesity trailblazers, London superzones, local delivery pilots, in order to design schemes within Crawley to meet the identified needs of the borough. When considering the health impact of individual developments, it is important that its surroundings are taken into account as well as its intended purpose. This includes uses involving vulnerable communities and sensitive uses, such as residential care homes, supported housing, schools, hospitals and health centres.*

**Sustainable Development Chapter Consultation Questions:**

- What do you think are Crawley's key strengths and weaknesses as a sustainable place?
- What should be the key priorities for making Crawley a more sustainable place by 2035?
- Is there anything in your local area which you feel affects your health?
- What do you think the health and wellbeing priorities should be for Crawley?

## Wellbeing & Communities

### **Providing High Quality Leisure and Cultural Facilities and Supporting Health and Wellbeing Services: Wellbeing**

*By 2035, Crawley will be a place that people want to visit, to have fun and spend their leisure time. As a town within a countryside setting that is very much valued by local people it will be safe and well cared for. The rich heritage which has shaped what the town is today will be respected, protected and enhanced. Local communities will be directly involved in planning how the town grows and develops in order to achieve the best outcome for all concerned; particularly where difficult choices have to be made.*

*Neighbourhoods will continue to offer local facilities alongside amenities that can be easily accessed along with informal green spaces for all to enjoy. The spirit and pride of individual communities will continue to be harnessed to make neighbourhoods the focus of local celebration.*

*People will be encouraged to stay physically and mentally fit and active, high standards of health care will be delivered locally and people will be able to age with confidence as they grow older. Crawley's parklands and open spaces, its sporting, and leisure facilities along with its cultural offer will be enhanced, for the benefit of local people and visitors.*

### **Creating Stronger Communities: Diversity and Community**

*Neighbourhoods will continue to feature in the development of the town, recognising the important role they play in helping shape and develop communities. Growth will be sustainable and supported by an infrastructure plan that complements development enabling people to live a long and happy life. All people who live here will be proud, confident and self-reliant, working together and with others for the good of the town.*

*Crawley will continue to improve the quality of life for its residents throughout every stage in their life. Excellent early years' provision will support children's development, which will be further assisted by the provision of good primary, secondary, further and higher education. Education, for both young and old, should unlock potential, giving people a real choice about what they do in their working life.*



## Character & Design

- 4.1 Crawley is known chiefly as a New Town, but has in fact, existed as a settlement for centuries, growing up around the original town of Crawley, and villages of Ifield, and Three Bridges.
- 4.2 Being awarded New Town status in 1947 accelerated the town's expansion; and the town has subsequently been planned and developed on a neighbourhood-by-neighbourhood basis, supported by economic growth at Manor Royal, Gatwick Airport and in the town centre. The New Towns Act provided that when a New Town was judged to be substantially complete, its development corporation would be wound up. In Crawley, this stage was reached in 1962 although four additional neighbourhoods have been added since then and two more are under construction.
- 4.3 The neighbourhoods are a key feature of Crawley's character; with each of the town's 13 neighbourhoods having been designed to ensure sufficient facilities and services are in place to support the day-to-day needs of residents. The neighbourhood principle is still relevant today, and two new neighbourhoods are being built at Kilnwood Vale to the west of Crawley, and Forge Wood.

### Chapter Content

- 4.4 This chapter sets out policies to guide the relationship between development proposals and key elements of Crawley's character. It covers design criteria expected for all new development, and heritage policies.

### The Key Issues

- 4.5 Crawley is a growing town set within a tight administrative boundary, and this presents challenges, not least in terms of finding appropriate sites for the new development and infrastructure that is needed to support the town in the future. With significant development needed over the next 15 years, it is essential that the locally distinctive features that contribute so much to the town's sense of place are recognised, protected and, where possible, enhanced as appropriate. The policies in this chapter consider the following issues:

#### Neighbourhoods

- 4.6 The neighbourhoods are a key feature of the planning and development of Crawley and represent a sustainable form of development. The principles contained in the original Crawley masterplan which underpinned the layout of each successive neighbourhood continue to reflect government guidance, particularly with regard to meeting local needs by focusing shops, schools and other community services and facilities in locations accessible by sustainable transport in the heart of each neighbourhood.

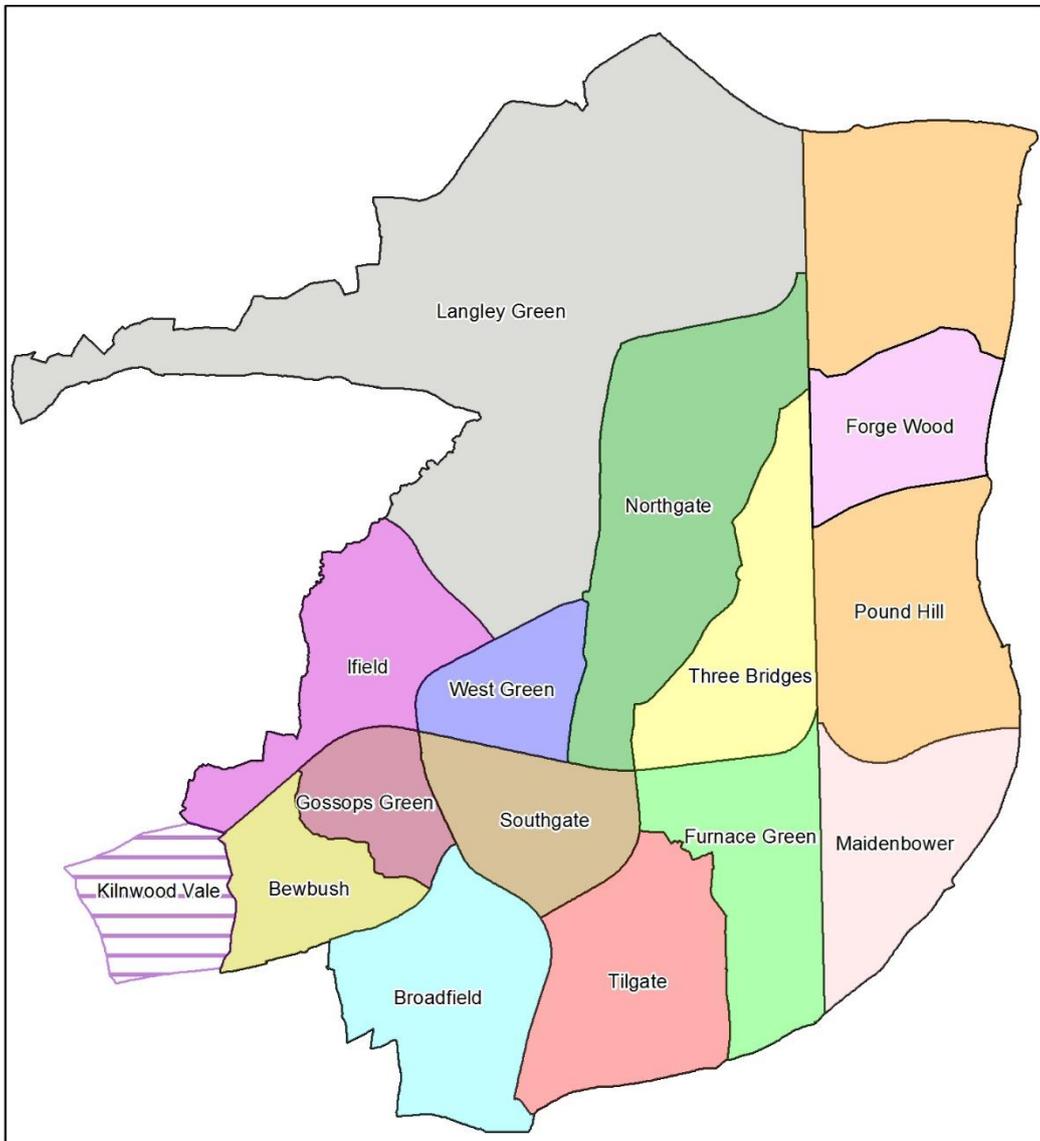
#### Design

- 4.7 Design continues to be an important consideration. The NPPF is clear that "*the creation of high quality buildings and places is fundamental to what the planning and development process should achieve*"<sup>25</sup>. Good design is key, helping make development acceptable to communities and should be grounded in an understanding and evaluation of each area's defining characteristics. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. It is important

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<sup>25</sup> National Planning Policy Framework, para. 124 (2019) MHCLG

therefore to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes. Consideration should also be given to the key role of structural landscaping and strategic views in order to maintain or improve the character of Crawley.



**Fig 2: Crawley's Neighbourhoods**

**Character and Design Chapter Consultation Questions:**

- What do you think is valuable about the areas you know in Crawley?
- What is your neighbourhood's defining characteristics?  
Please provide names of places and any details of the things you like about particular neighbourhoods or settings, and would want to protect or enhance it.
- What don't you like about parts of Crawley?
- Are there any places you think would be improved by change and new development?
- How can the understanding, identification and definition of existing character strength better define and guide new development?

- What makes higher density areas like St Peters Road and Brighton Road attractive?
- Where in Crawley should higher densities be allowed?
- Are there areas in Crawley which should be protected from higher densities?
- Do you agree that new developments should be designed to be inclusive for people of all physical abilities?

## Local Plan Policies

### Neighbourhood Principle

4.8 Crawley was designated a New Town in 1947 and incorporated the settlements of Crawley, Ifield and Three Bridges. Minoprio's masterplan phased the development of the town through the addition of complete neighbourhoods, each with good access to its own centre offering local shops, services and community facilities. The relatively small size of each neighbourhood was intended to help build the new communities, achieve closer integration and provide greater accessibility to the neighbourhood centres.

### Strategic Policy CD1: Neighbourhood Principle

The neighbourhood principle will be protected and enhanced by:

- a) maintaining the neighbourhood structure of the town with a clear pattern of land uses and arrangement of open spaces and landscape features. Development within the neighbourhoods should mainly be residential, in-keeping with the existing neighbourhood. 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; and
- b) ensuring the neighbourhood centres remain the focal point for the local community, providing facilities that meet their day-to-day needs within walking distance; and
- c) encouraging development unless it would result in local facilities and services which help meet the day-to-day needs of residents being lost.

### Reasoned Justification

4.9 *The NPPF places a particular onus on the promotion of healthy and inclusive communities. Attention is drawn to the role that planning can play in bringing people together, promoting sustainable development, and taking an integrated approach to the location of housing, economic uses, and community services and facilities. The neighbourhood principle continues to represent the most sustainable approach to meeting these objectives.*

4.10 *Therefore, the role of the neighbourhood centres will be protected and enhanced. Uses which meet the day-to-day needs of residents and generate local trips, including shops, community uses, small employment premises and schools, will continue to be focused in locations which are most accessible by foot, cycling and/or public transport. The proximity and mix of uses and the ease of accessibility also contributes to the character of the centres by creating a focus of activity.*

### Policy CD1: Neighbourhood Principle Consultation Questions:

- Is this policy still valid?
- Does this policy appropriately reflect the role played by neighbourhoods in Crawley?
- Are there any new matters which it should include? For example, should the policy itself refer to local employment opportunities, supporting home working and new technologies?

## Urban Design Principles

- 4.11 Successful places share a number of characteristics based upon key urban design principles. The borough council will use these principles as part of its consideration of a wide range of development proposals whether the schemes are strategic, creating new streets and spaces, or smaller but affecting an existing place, for example by providing natural surveillance over an unsupervised path. New development can influence whether successful places are created, retained or enhanced.

### Strategic Policy CD2: Making Successful Places: Principles of Good Urban Design

To assist in the creation, retention or enhancement of successful places in Crawley, development proposals will be required to:

- a) respond to and reinforce locally distinctive patterns of development, urban and landscape structure and character and protect and/or enhance heritage assets;
- b) ensure movement corridors and the placing of new development take account long distant vistas, landmarks, views into and out of adjoining areas, gateways to and between particular areas, and focal points (see Policies CD3 and CD4b);
- c) make places that are permeable and connect with each other, and which are easy to get to and move through, taking advantage of pedestrian movement desire lines. This should include provision, and maintenance, of direct routes that lead to where people want to go. The specific placing, form and urban structure of new development must, in the first instance, be influenced, directed and determined by movement corridors and patterns;
- d) provide recognisable routes, intersections and landmarks to help people find their way around, places that are legible and easy to read;
- e) put people before traffic and integrate land uses and transport networks as outlined in Policy CD4a, building upon, connecting to, enhancing and extending sustainable movement corridors in particular;
- f) create continuous frontages onto streets and spaces enclosed by development which clearly defines private and public areas and ensure streets, footpaths and open spaces are overlooked by buildings;
- g) create public spaces and routes that are attractive, safe, uncluttered and which work effectively for all in society, including disabled and elderly people;
- h) identify, test, determine and (subject to outcome) embrace, opportunities for increased density, where appropriate and in line with Policies CD3 and CD4a.

At a micro-scale, the layout and arrangement of buildings or streets for all new development needs to consider a number of key issues, including

- i) orientation, solar gain and aspect, including the path influences of the daily sun and the location of habitable rooms;
- j) consider flexible development forms that can respond to changing social, technological and economic conditions; and
- k) provide diversity and choice through a mix of compatible developments and uses that work together to create viable places that respond to local needs.

Applications must include information that demonstrates that these principles would be achieved, or not compromised, through the proposed development.

### Reasoned Justification

- 4.12 *High quality design is a key contributor to the delivery of successful, sustainable, appropriate, respectful and desirable development. In 2010, the borough council completed a broad character assessment of the town to help define its sense of place and this should be considered to inform the design of development proposals.*

- 4.13 *The assessment identified broad character areas and positive features that should be protected and enhanced, including the green setting of the town and the quality of particular buildings and views. The assessment used key urban design principles to assess the quality of areas drawn from the DETR publication “By Design – Urban Design and the Planning System”. One of the objectives of “By Design” is to remind all those involved in the development process about what is required to create successful places.*
- 4.14 *Good Urban Design is sustainable design. Urban form and structure have a major influence on climate change. There is a crucial relationship between form and space, buildings, energy, movement patterns, land take and location. This should be based on an understanding of movement patterns around which appropriate uses can be located and then suitable densities determined (see Policy CD4a). In turn, this needs to be grounded in an understanding and evaluation of the immediate and local context and its place within the neighbourhood, urban structure and the character of the area (see Policy CD3). Sustainable urban design is not necessarily about changing the way places look but about making places work better.*
- 4.15 *Good Urban design is not just sustainable in form and its use of resources, but also in its contribution to the stability of communities and their economic viability. In this regard, successful schemes need to embody a design approach that seeks to bring together solutions to wide ranging issues. Whether strategic or small in size, all new development needs to consider its place and impact within the wider context and should think beyond the site’s red lines. This is particularly important, with regard to movement patterns, in establishing walkable neighbourhoods and ensuring new development can optimise and promote modal shift to sustainable alternatives.*

**Policy CD2: Making Successful Places: Principles of Good Urban Design Consultation Questions:**

- Is this policy still valid?
- Are there aspects of this policy which should be more clearly defined in within the policy or elsewhere?
- Are there any new matters which it should include?

**Local Character and Design of New Development**

- 4.16 An unprecedented number of densification, intensification and infill development projects as well as new planned urban extensions are occurring across big cities and towns throughout the UK, and Crawley is no exception. New urban characters are being introduced near, alongside and within established neighbourhoods, at a fast pace. Therefore, it is critical that new proposals are grounded in an understanding and evaluation of each neighbourhood’s defining characteristics.

**Strategic Policy CD3: Local Character and Design of New Development**

New Development will be supported where it can be shown that:

1. Development proposals:
  - a. respond to and reinforce locally distinctive patterns of development and landscape character and protect and/or enhance heritage assets;
  - b. are based on a thorough understanding of the significance and distinctiveness of the site and its immediate and wider context and demonstrate how attractive or important features which make a positive contribution to the area would be integrated, protected and enhanced. These features include: views, landmarks,

- key buildings, footpaths, rights of way, trees, green spaces, hedges, other historic landscape features or nature conservation assets, and walls; and
- c. are of high quality in terms of their urban, landscape and architectural design and relate sympathetically to their surroundings in terms of design, scale, density, height, massing, orientation, views, landscape, layout, details and materials.
2. Where Area Wide Character and Design Assessments have been prepared, development proposals will be expected to be informed by them and respond to them, to ensure proposals are grounded in an understanding and evaluation of the area's defining characteristics. Proposals should include the opportunities identified for improving the character and quality of an area and the way it functions. Assessments should be used as early as possible in the evolution of schemes.
  3. Permission will be refused for development of poor design that fails to take its local character properly into account.

### **Reasoned Justification**

- 4.17 *The government, through the NPPF, recognises this issue. It directs and places a particular emphasis that Planning and Design policies and decisions should be "...grounded in an understanding and evaluation of each area's defining characteristics .....ensure that developments:...(a) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); (b) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places."*  
*And that:*  
*"Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents"*<sup>26</sup>.
- 4.18 *A character and design-led approach prompts a much-required 'bottom-up', area specific, bespoke approach. This makes local character and context an essential part of the plan process. Urban characterisation design assessment studies should help towards finding the middle ground.*
- 4.19 *Area-Wide Character and Design Assessments will, in particular, reinforce Local Plan Policy CD2a, expanding upon, and clarifying issues raised by a variety of the Local Plan policies. They are a beneficial and essential tool for guiding planning policy and decisions in regard to new development. Other related policies include LC1: Structural Landscaping, Policy LC2: Important Views, Policy LC5: Development Outside the Built-Up Area, Policy HA1: Heritage Assets. Policy HA2: Conservation Areas, and Policy HA3: Areas of Special Local Character.*
- 4.20 *There are clear Local Plan policies, outlined later in this chapter, which outline in more specific detail, how the outputs arrived at from Area-Wide character Assessments, inform design, density, layout and the form of new development. Policy CD5 in particular outlines the next step in how the planning and design of new development should be guided and progress from the understanding and evidence gathered through character assessment. They are also inextricably linked to the following topic areas; Density & Form, Housing Land Typologies; the Urban Design SPD, and Maintaining Housing Delivery.*

<sup>26</sup> National Planning Policy Framework, Chapter 12, 'Achieving well-designed places (2019) MHCLG

- 4.21 *Character Assessments are by their very nature both foundational and fundamental to new development proposals. They provide a tailored design and character framework guide which aid in the retention, and protection of distinctive places, particularly where development is proposed near or within established urban settlements and neighbourhoods. The individual outputs from these assessments will become an essential part of the plan process. They will reinforce Local Plan policies, CH2 (a) and CH3 (a) and (b) in particular.*
- 4.22 *Individual Assessments are valuable for all neighbourhoods and settlement types with established densities and settlement patterns, whether in urban, suburban, semi-rural, rural or conservation areas. The emphasis, application, content, and conclusions reached will vary. The respective outputs of individual assessments, by their very nature, will vary and be tailored to reflect prevailing design character, form, setting and context. They should include; design and character identification and analysis underpinned by good practice and evidence based arguments to support the rationale behind the assessment conclusions.*

**Policy CD3: Local Character and Design of New Development Consultation Questions:**

- What do you think is valuable about the areas you know in Crawley? Please provide names of places and any details of the things you like about it and would want to protect or enhance.
- What don't you like about parts of Crawley? Are there any places you think would be improved by change and new developments?

**Effective Use of Land**

- 4.23 It is important that land is used efficiently, particularly given the limited extent of the borough and the constraints on development which affect many areas of the town.
- 4.24 The effective use of land is an important objective in making development more sustainable. As such, it is embedded in government policy. Compact development not only uses less land, but it also has the potential to create efficiencies in the use of other resources, including energy supply, services and transportation and allow better provision of open space.

Density and the Presumption in Favour of Sustainable Land Use

- 4.25 The NPPF is clear that in setting new 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. This should include the use of minimum density standards for the town centre and other locations that are well served by high frequency, reliable public transport (see Policy CD4a).
- 4.26 In such locations, standards should seek a significant uplift in the average density of residential development, unless it can be shown that there are strong reasons why this would be inappropriate. The use of minimum density standards should also be considered for other parts of the plan area. These could be set out as a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range.
- 4.27 Today Crawley's residential neighbourhoods are characterised predominately by two-storey, family-sized homes, all built meeting established internal and external space standards. In seeking higher densities for the borough, compromising the town's character, reducing quality of life for residents and creating town cramming, will still not be accepted.
- 4.28 Building at higher densities not only makes more efficient use of land but can also deliver higher quality. There are many cases where higher density designs produce a poor quality environment and public opinion can be biased by negative perceptions.

Some people imagine high density as being tall buildings full of small apartments which fail to relate to the local context. Yet high structures and long, impermeable repetitive perimeter apartment blocks do not necessarily increase density. Higher residential densities can be achieved in low rise developments of 2 to 3 storeys which use innovative ways of providing outdoor amenity space. Many of England's best villages and market towns are widely seen as attractive places in which to live, yet they have a compact form and relatively high density.

- 4.29 Good examples of compact development within Crawley include St Peter's, Brighton Road and Ifield Village Conservation Areas as well as more recent developments such as the Commonwealth Drive scheme at Three Bridges.

#### The Form of Development, Compact Neighbourhoods and Movement

- 4.30 Urban form refers to how places are arranged and designed. It consists of the relationships, shape and size of buildings, structures, landscape and spaces. The five most important elements of development form can be summarised as follows (note – there are eight interchangeable aspects to form):
1. Layout (Urban Structure; Urban Grain, Density and Mix);
  2. Scale (Height and Massing; Building Type; Density, Façade and Interface);
  3. Appearance (Details and Materials; Façade and Interface; Building Type);
  4. Public Realm (Streetscape and Landscape; Details and Materials; Façade and Interface); and
  5. Movement Patterns (Urban Structure, Streetscape and Landscape. It also includes separation aspects, such as Connectivity, Permeability and Legibility).
- Movement is one of the most significant aspects of urban form. Policy CD4a outlines requirements in regard to the positioning and layout of routes.
- 4.31 Urban form influences users' activity and movement within, through and around a place. As a result it has a major influence on climate change. Almost 30 per cent of carbon emissions come from buildings and a further 25 per cent from transport<sup>1</sup>. Government policy makes it clear that higher residential densities, public transport and sustainability are all interconnected and that they rely upon one another in order to achieve an increase in the supply of residential units.
- 4.32 Higher levels of sustainable residential density depend on a one key infrastructural foundation: fast, reliable, frequent and high capacity public transport. Crawley currently has a number of these public transport corridors. Key stations or interchanges include:
1. Two of the best rail stations south of London (in terms of connectivity and frequency of service) at Gatwick Airport and Three Bridges;
  2. Gatwick Airport is directly linked by coach to more than 100 UK towns and cities;
  3. Crawley town centre rail and bus station hub;
  4. Two high frequency, quality bus corridors, both running north/south along part of the Fastway bus network routes:
    - a. From Gatwick to Manor Royal east (Gatwick Road North and City Place stops), then the Town Centre stop on Southgate Avenue and all stops south to Broadfield Barton (Fastway Routes 10 and 20);
    - b. From Gatwick to Manor Royal Centre stop, and the Town Centre (Crawley Bus Station and Broadway stops) (Fastway Routes 10 and 100).

## Strategic Policy CD4(a): Effective Use of Land: Movement, Sustainability and Urban Form

Where new neighbourhoods and significant new development is proposed:

- a. It should be planned and located adjacent to stations, stops or interchanges along segregated/high-priority, high capacity, and frequent public transport corridors.
- b. Movement patterns, built form and the layout and framework of routes need to be designed and organised in a way that ensures future inhabitants are within a 10 minute radius walking distance of such rail stations or bus stops (also see Policy ST1).

In relation to walking and cycling, new development should:

- i. Understand and respond to wider movement patterns within the borough and demonstrate how new proposals will be connected to the wider network. Schemes should be integrated with town and local centres, schools, employment areas and also to connect to the closest areas nearby where there are large zones of green open space.
- ii. To encourage use of these movement corridors, new route alignments must follow desire lines as much as possible and through routes should be relatively straight where possible, providing clear legible direct linkages with adjoining areas.
- iii. Be orientated to overlook these movement corridors in order to provide passive supervision and safety.

When determining the alignment of all new movement corridors, the requirements of Strategic Policies CD2 and CD3, CD4b and CD5 need to be properly taken into account.

### **Reasoned Justification:**

- 4.33 *The commercial viability of frequent and reliable public transport depends on compact development and minimum densities. Compact neighbourhoods provide a more substantial and reliable customer base for public transport services. In turn, frequent and reliable services encourage a shift away from private car use, Research<sup>27</sup> suggests net densities of 60 dwellings per hectare are necessary to sustain a dependable, frequent and high capacity public transport service, such as provided by sections of the Crawley Fastway bus network, or more expensive transport infrastructure such as tram and rail networks.*
- 4.34 *All new development should be informed by an understanding of movement patterns. Too often permeability and connectivity is treated as an afterthought leaving new development isolated with minimal or disjointed linkages to the wider network. New development should be seen as an opportunity to integrate improvements to movement and public transport corridors.*
- 4.35 *Delivering relatively straight, through routes, particularly for pedestrians and cyclists, is very important. It requires looking both outward to the wider network as well as inward to the site being developed. When a district or movement corridor is well connected it will naturally encourage sustainable movement patterns and reduce the dependence and reliance on vehicular movement. It will also have high pedestrian footfall, which will improve local centre viability and attract local shops and services, closer to where people live and work.*

### Layout: Urban Structure, Urban Grain, Density and Mix

- 4.36 The NPPF is clear that “*the creation of high quality buildings and places is fundamental to what the planning and development process should achieve*”. Good design is key as it helps make development acceptable to communities. Strategic

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<sup>27</sup> Urban Design Compendium, p47 (HCA 2013 and English Partnerships 2007)

Policy CD3 highlights one of the critical ways to achieve this acceptability, in terms of good design being grounded in an understanding and evaluation of each area's defining characteristics.

- 4.37 Density is just one aspect of built form. As referred to earlier, building height, block size and building typology all affect the character of an area and the perception of density (see paragraphs 4.28 – 4.29). Density and mix is concerned with the amount of development, intensity of activity and the associated range of uses. Accessibility, street life, vitality and viability are all impacted differently depending on development scale or levels of density. Many schemes are perceived to be excessively dense, visually inappropriate and generally out of keeping with their adjoining context when they fail to take account of the need for density and form to be appropriate to its context. This does not mean that density, design or unit typology should be the same as the surrounding area, but new buildings need to respect their neighbours.
- 4.38 'Urban Structure' is the term used to describe the essential diagram of a place or area. It identifies the relationship between new development and nature, land form and existing buildings. The framework of routes and spaces that connect locally and more widely and the way developments, routes and open spaces and precedents relate to one another; grounded in an understanding and identification of the defining characteristics of a place or area.
- 4.39 'Urban Grain' refers to the nature and extent of the subdivision of an area, the pattern and scale of streets and plots and the rhythm of building layouts.

#### **Strategic Policy CD4(b): Effective Use of Land: Layout, Scale, Appearance and Public Realm**

Development proposals must use land efficiently and not unduly restrict the development potential of adjoining land, nor prejudice the proper planning and phasing of development over a wider area. The creation of high quality buildings and places is fundamental. Understanding and responding appropriately to site context, character and any existing or adjoining form of development is essential in order to make effective use of land.

All development will be expected to be appropriate to and respectful of its context, although this does not mean that appearance, scale, density, height, massing and form need to be the same as the surrounding area. In order to secure more sustainable, higher density across the town, new development must:

- i. document and submit careful analysis of both site and context;
- ii. identify, define (in accordance with CBC documents/SPD terminology) and illustrate surrounding landscape, urban structure, urban grain, existing character and land use constraints and outline how any new proposal respects and complements these key elements of urban form;
- iii. identify and outline how proposals impact on setting, views and skyline;
- iv. respond to and respect existing patterns of form, massing and height;
- v. produce good design as well as a bespoke, site specific design response; and
- vi. ensure attention to detail and reference to the borough's design principles policies.

Regard must be had to other Local Plan policies such as CD4b, CD5 and CD6; Heritage Policies (HA1 – HA6); Landscaping Policies (LC1, LC2, LC5 and LC6: and the overarching Character and Design Policies CD1 – CD3.

Minimum density ranges will apply to all new development. Different ranges will apply to different types of areas.

In general, the following key density categories are:

- a. High density range: 180 – 300 dwellings per hectare.  
Applicable to brownfield development sites in Crawley Town Centre and around Three

Bridges railway station. Areas which are within 5-10 minutes walking distance of high capacity, high frequency public transport.

In terms of urban form, these areas will predominantly contain a mix of mid-rise buildings, mansion blocks and terraced housing.

5 to 10 storeys in height.

- b. Upper medium density range: 95 - 180 dwellings per hectare.

Areas where, although served by high quality public transport corridors and within 10 minutes walking distance of stops and stations (see Policy CD4a) only upper medium range densities will usually be appropriate due to the established character and layout. Areas, for example north of Three Bridges Station, the historic town of Crawley (Conservation Areas) and the adjoining 1950's 'New Town' district, particularly the built fabric located between the historic High Street and Memorial Gardens and between the south of The Boulevard and Haslett Avenue.

In terms of urban form, these areas will predominantly contain a mix of low to mid-rise buildings, mansion blocks and terraced housing.

3 to 5 storeys in height.

- c. Lower Medium density: 95 – 130 dwellings per hectare.

Areas south of the town centre, along Fastway Routes 10 and 20 (as outlined in 4.32 above).

In terms of urban form, these areas will predominantly contain a mix of low rise building and terraced housing.

2 – 5 storeys in height.

Density standards for development elsewhere within the residential neighbourhoods will come forward through the Area Character Assessments. However, in general, 95 dwellings per hectare will apply as a minimum to all small scale infill developments within the Built-Up Area Boundary across the borough.

### **Reasoned Justification**

4.40 *A comprehensive approach can be more efficient and reduce the impact of development, ensuring that land that has a reasonable prospect of being developed is not prejudiced or restricted. National planning policy emphasises the need to plan for the effective use of land in order to deliver a sufficient supply of homes, and states that strategic policies should make “as much use as possible of previously-developed or ‘brownfield land’<sup>28</sup> ... and “promote and support the development of under-utilised land and buildings”<sup>29</sup>. Furthermore, the NPPF identifies that “small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly”<sup>30</sup>.*

4.41 *The Local Design Standards identified for the Local Plan and the detailed supporting area-wide design assessments will inform which options are most appropriate in terms of the character and context for specific parts of Crawley.*

4.42 *Density is a measure, but no specific design qualities or characteristics are implied. It is a product of design, not a determinant of it. Density has to be appropriate to context. Successful extensions of the character of the surrounding area can help create great settings for new development. The way in which a place is designed is more important to its desirability than the measurement of its density. Measured density and perceived density are not necessarily aligned. The urban form of two of the nation’s most desirable addresses, London’s Kensington and Chelsea, are to a*

<sup>28</sup> National Planning Policy Framework, para. 117 (2019) MHCLG

<sup>29</sup> National Planning Policy Framework, para. 118d (2019) MHCLG

<sup>30</sup> National Planning Policy Framework, para. 68a (2019) MHCLG

*high density layout. However, neither district is high-rise, and both districts are well designed and interspersed by garden squares and parks.*

- 4.43 *On the same sized plot, different approaches to urban form and height can achieve the same density, i.e. the development can appear very different but can still have the same density. The following three approaches to form are a good example of this:*
- (1) two and three storey terraced housing; urban form: high site coverage pattern;*
  - (2) three and four storey buildings with varying height, block size and building depth; urban form: medium site coverage;*
  - (3) a high rise tower block; urban form: low site coverage.*
- 4.44 *As is typical of new towns, Crawley was conceived as a lower mid density town with average densities of 21/28 dwellings per hectare. Many of England's best villages and market towns and many of Crawley's historic Conservation Areas have a compact form and considerably higher densities of around 95 dwellings per hectare.*
- 4.45 *It is not appropriate to apply the density ranges outlined in Policy CD4b without taking into account other factors and planning policies. In particular, local context, design quality and public transport capacity.*

#### **Policy CD4: Effective Use of Land Consultation Questions:**

- What areas in Crawley should higher densities be focused? National policy requires Crawley to set higher density levels for the town centre and around high capacity, high frequency transport interchanges. Are there other areas suitable for increased density levels, relative to the current levels?
- Are there areas in Crawley which should be protected from high densities? Why?
- Are there areas in Crawley which urban and landscape form needs to be protected from higher densities? Why?
- Are there particular types of buildings and layouts that you like which can offer higher densities? For example, this could include apartments; mews cottages; town houses; maisonettes.
- Neighbourhoods range from 20 to 200 dwellings per hectare, with neighbourhood's like Maidenbower being the least dense and new apartments schemes in the town centre being the highest. What would be a suitable range of density levels for Crawley for the future in light of the high housing needs emerging from the town's population and limited land supply?

#### **Local Design Standards**

- 4.46 Once urban form and landscape characterisation design assessment studies have been completed, the understanding and evidence must inform planning and design responses and guide a bespoke local design approach tailored specifically to the character of its immediate context.
- 4.47 For a particular site or area, finding the balance between what may be conflicting objectives depends on five factors that influence the development process:
1. Policy;
  2. Feasibility (economic and market conditions);
  3. Context of the site (its site, setting, adjacent land uses and heritage);
  4. Community (involvement in the process of change); and
  5. Approach (the design team, and management and planning of the design process).

## Strategic Policy CD5: Local Design Standards

Where Area Wide Character and Design Assessments have been prepared, development proposals will be expected to be informed by them and respond to them. The outcomes from these studies are essential and foundational.

For all new substantial development, such Assessments must be prepared for and should guide both the design and planning process. Springing from and directed by this work, local urban design framework plans and development briefs will be required to:

- i. Illustrate and describe how planning and design policies and principles should be implemented in an area;
- ii. To provide indicative, but flexible vision for future development form.

Detailed three-dimensional masterplans should be prepared which:

- a. Produce indicative urban design concepts, informed by preliminary technical appraisals, viability testing and adherence to the overarching requirements of Policies CD1, CD2, CD3 and CD4(a) and (b);
- b. Be based on an understanding of the basic aspects of form (see the Urban Design SPD). Legibility, place hierarchy and movement patterns in particular;
- c. Defining urban and landscape structure, the relationship between landscape, settlement and movement. Important views out of the site as well as defining from where there are the most important views into a site;
- d. The scale and size of buildings, appropriate to both its function and the areas existing character, adjoining built context.

Employ design tools such as 3D digital modelling to assess the quality of new spaces and structures. Using photomontaged images of retained character elements to accurately test and explore options. In particular from key points (see 'c' above) from a realistic street level position / social line of vision.

It is the responsibility of Crawley Borough Council to produce Area-Wide or Character-Specific Design Assessments. However, where resources are limited, consultants for a landowner or developer may work with the local authority to produce the documents jointly.

### **Reasoned Justification**

- 4.48 *New proposals have to build upon existing strengths and patterns. Movement in particular and the pattern of routes is basic to our experience of place. Retaining, creating or expanding the character of a place should be based on the existing site and adjoining context movement pattern; its connections, hierarchies, geometry and relation to topography.*
- 4.49 *A tailored, local character and local design grounded master plan, should result in new development that reinforces local character and strengths and creates places with a real sense of identity. Identifying those assets and features, whether hedgerow, vista, route or building worth protecting. Even when neighbourhoods cannot avoid unwanted change from new development.*
- 4.50 *In a rural area, urban and landscape form varies considerably from that of a town centre or suburb, as does the character. However, within individual neighbourhoods, a number of contrasting forms and character can occur. This should be identified as part of local design standards and related development briefs. It is inappropriate to apply the same landscape and urban design criteria to such different forms.*
- 4.51 *Various urban design tools are available which should be used to assist in identifying key components of the context of an area and help identify appropriate development forms. Used effectively, they can help deliver a high quality of design, urban form and*

*environment. Urban design framework documents, development briefs and masterplans will normally be required in an area where there is a need to guide and promote change. In certain cases, design codes may also need to be developed in order to provide new development with a template within which to design individual buildings.*

- 4.52 *Masterplans chart overall urban design guidance and intent, specifically:*  
*(a) how a site or series of sites will be developed, implemented and phased;*  
*(b) setting out principles on matters of importance rather than prescribing design in detail.*  
*If consistent with the Local Plan, and if work has been prepared in collaboration with the local planning authority in accordance with the Planning Regulations, including undertaking a period of appropriate public consultation and sustainability appraisal screening, it may be adopted formally as a Supplementary Planning Document.*

#### **Policy CD5: Local Design Standards Consultation Questions:**

→ Do you agree with the draft policy for Local Design Standards. Do you have any thoughts on what this policy should include for Crawley?

### **The Normal Requirements of All New Development**

- 4.53 An attractive and well-planned environment can contribute to well-being and attract inward investment to the borough. New developments should therefore be of a high quality to protect and enhance the distinctive character of the town and create successful new streets and spaces. In determining whether a development proposal is of a high standard of design, there should be careful consideration of how the scheme would look, how it would work in practice and whether it is built to last, for example in terms of the choice of materials.

#### **Strategic Policy CD6: Normal Requirements of All New Development**

All proposals for development in Crawley will be required to:

- a) Provide or retain a good standard of amenity for all existing and future occupants of land and buildings, including compliance with internal standards for new dwellings as set out in Policies CD10 and CD11, and not cause unreasonable harm to the amenity of the surrounding area by way of overlooking, dominance or overshadowing, traffic generation and general activity, for example noise, smells and/or vibration;
- b) Retain and reuse existing buildings occupying a site or demonstrate why this is not feasible, viable or desirable. This is particularly relevant in the case of building, structures or landscape features that contribute to local character, setting and context;
- c) For all new development, but where buildings are being replaced in particular, the architectural quality, form, height, proportions and materials proposed need to be a quality to complement the existing setting and character of the area, with a particular focus on Policies CD2, CD3 and CD4b;
- d) Retain existing individual or groups of trees that contribute positively to the area and allow sufficient space for trees to reach maturity. Sufficient space should also be provided in private gardens that would not be overshadowed by tree canopies; and proposals should ensure that rooms within buildings would receive adequate daylight. Where a development is proposed or where trees would be lost to development, tree planting should accord with the standards set out in Policy CH6;
- c) Demonstrate how “Secure by Design” principles and guidance set out in “Secured by Design” design guide (as amended) have been incorporated into development proposals to reduce crime, the fear of crime, anti-social behaviour and disorder. For all

development, the potential impact on community safety must be carefully considered at the earliest opportunity to ensure that measures are integrated into proposals without compromising other objectives;

- e) Meet the requirements necessary for their safe and proper use, in particular with regard to access, circulation and manoeuvring, vehicle and cycle parking, loading and unloading, and the storage and collection of waste/recycling; and
- f) In respect of residential schemes, demonstrate how the Building for Life 12 criteria (as amended) for the evaluation of the design quality of residential proposals have been taken into account and would be delivered through the scheme.

Proposals must be supported by a future management and maintenance plan for all shared hard and soft landscaping, semi public or semi private areas to ensure these areas become well-established. Contributions towards streetscene improvements, public art and CCTV will be sought in accordance with council guidance.

Developers must comply with the council's waste and recycling guidance document when designing new developments (or changing the use of existing buildings) within the borough. Consideration must be given to both the internal and external design of properties in order to allow sufficient space for both general waste and recycling provision and to provide adequate and safe access for the council's waste collection contractor.

Development proposals should comply with any relevant supplementary planning guidance produced by the council including residential extensions, Conservation Area Appraisals, the Manor Royal SPD, and advice on signs and advertisements. Further information on specific requirements for development can be found in the Local List of Planning Requirements.

### **Reasoned Justification**

- 4.54 *The council places particular importance on the need for all developments, whether on sites with designated features or not, to be of high quality and to protect and enhance the distinctive character and important cultural heritage of the town. Existing assets and their settings should be preserved and where possible enhanced.*
- 4.55 *Many of the decisions that influence design quality are taken at early feasibility stage. 'Building for Life 12' (2012) has been developed by CABI at the Design Council, Design for Homes and the Home Builders Federation as a tool to evaluate housing proposals. Building for Life uses 12 criteria, grouped into three categories – 'Integrating into the neighbourhood', 'Creating a place' and 'Street and home', to assist in the design process by highlighting where good practice can be applied. To raise standards, the council will also encourage the use of design reviews, where appropriate, undertaken by The South East Regional Design Panel or another suitable body. The council will continue to prepare supplementary planning documents and encourage pre-application discussions.*
- 4.56 *Community safety is an important issue in the borough and in determining whether a place is an attractive location in which to live, work or to visit. The fear or perception of crime and anti-social behaviour is also socially damaging and detrimental to the local economy. The design, location, use or change of use and operation of a wide range of proposals can make a significant contribution to community safety. The application of Secured by Design has been proven to achieve a significant reduction of crime risk by combining minimum standards of physical security and well-tested principles of natural surveillance and defensible space.*
- 4.57 *The Policy also seeks to ensure that development schemes identify and take account of existing landscape assets that are a positive element for the character of the town, and that landscape proposals are not dealt with as an afterthought but are progressed as an integral part of the design of the scheme. All new proposals should be mindful of the long-term future management and maintenance requirements for*

*the development scheme and address responsibilities for this as part of any planning application. To ensure high quality public realm across the borough, irrespective of the intended management responsibility, all sites should meet standards set by the Local Authority for the purposes of their adoption as part of its amenity maintenance role. Local Authority standards will be provided to support development schemes and the preparation of management and maintenance plans.*

- 4.58 *This Policy will also ensure that retained trees that make a contribution to the streetscene are not at risk of being removed because they significantly reduce the usability of new gardens for residents or because new buildings are placed in close proximity. Tree losses through development that are accepted by the local planning authority should be mitigated by new planting.*
- 4.59 *Public art can highlight what is special or locally distinctive about an area and create cultural assets that help in the creation of interesting streets and spaces. These can add to the enjoyment of an area or help people to navigate the locality. Attractive streets and spaces can encourage other forms of investment and patronage by customers.*
- 4.60 *New development will be used in particular centres to achieve environmental and regeneration objectives. All development, including new or altered shop fronts and advertisements, should be of a high quality design standard and reinforce the impact of improvement initiatives.*
- 4.61 *Crawley Borough Council's Local List of Planning Requirements is available from the council's Development Management team, and on the council's website: [www.crawley.gov.uk](http://www.crawley.gov.uk). It sets out the local validation requirements for planning applications and gives specific guidance for each application type.*

**Policy CD6: Normal Requirements of All New Development Consultation Questions:**

- Is this policy still valid?
- Is it helpful to have a single policy covering a wider range of considerations?
- Some of the elements of this policy have been moved to other policies. Are there any other elements of this policy which should form a separate policy?
- Are there matters which are not covered by this policy, or another policy in the Local Plan, which would logically be located in this policy?

**Aerodrome Safeguarding**

- 4.62 The adopted Local Plan does not currently include a policy in relation to Gatwick Airport Aerodrome Safeguarding but a recent study has suggested that awareness of the requirements for consultation with airports on planning applications is inconsistent. Aerodrome safeguarding is a mechanism to ensure the safe and efficient operations of airports; that is the safety of an aerodrome's operation as well as the safety of people living and working nearby. It is different to the principle of safeguarding land for a possible additional runway at Gatwick Airport, instead relating to the specific nature of development, for example its height and design, impact on radar modelling, or the use of particular trees/plants that could increase the risk of bird strike.
- 4.63 Gatwick Airport is a licenced aerodrome. Therefore, the council is required to consult Gatwick Airport Limited on all planning applications where aerodrome safeguarding applies. The safeguarded area is neither the responsibility nor the proposal of the local planning authority.

## Strategic Policy CD7: Aerodrome Safeguarding

Development will only be supported if it is consistent with the continued safe operation of Gatwick Airport will be supported.

Where required, the Local Planning Authority will consult with the airport operator and/or the operator of technical sites (e.g. radar stations) on relevant proposals in the aerodrome safeguarded areas. Statutory consultation responses may require that restrictions are placed on the height or detailed design of buildings or on development which might create a bird hazard.

Proposals that cannot be mitigated to the satisfaction of the statutory consultees are considered to be a hazard to aircraft safety, and will be refused.

### **Reasoned Justification**

- 4.64 *Aerodrome Safeguarding and the requirements to consult are set out under Planning Circular 01/2003. However, recently published evidence (Lichfields in liaison with General Aviation Awareness Council, July 2018) is suggesting that, in general terms, the guidance in Planning Circular 01/2003 is not being applied consistently by local planning authorities, and suggests that for clarity, local plans with an officially safeguarded aerodrome should include a policy.*
- 4.65 *Policy CD7 has been included to raise awareness of the requirements of Aerodrome Safeguarding and to help ensure the safe operation of Gatwick Airport. The whole of the borough of Crawley is covered by the Aerodrome Safeguarding area. Therefore, its outer boundary cannot be indicated on the Local Plan Map.*

### **Policy CD7: Aerodrome Safeguarding Consultation Questions:**

- Would a policy on aerodrome safeguarding provide additional clarity in preparing and determining planning applications, or would this be a repetition of existing national guidance?
- Should any policy go into specific detail as to the type of development to which aerodrome safeguarding applies, and the type of supporting information required, or is this level of detail best addressed through consultation with Gatwick Airport Limited Aerodrome Safeguarding and/or reference to the Local List?

### **Advertisements**

- 4.66 Signs and advertisements are a long-established feature of the urban environment. All advertisements are intended to catch the eye of passers-by, if only fleetingly. Outdoor advertisements should make a positive contribution to the visual environment and through good quality design, help create a lively atmosphere of colour, variety and interest, appropriate for the area in which it is to be located.

## Non-Strategic Policy CD8: Advertisements

Applications for express Advertisement Consent will be permitted unless the proposed advert(s) would have a detrimental impact on amenity or public safety, either individually or by virtue of cumulative impact. Relevant factors considered by the council will include:

- a) The impact on visual amenity in the vicinity of the advertisement, taking into account the degree to which it is in scale or keeping with any host building or structure, or with the character of the locality, including scenic, historic, architectural or cultural value or features.
- b) Any impact on visual or aural amenity in the vicinity arising from lighting or noise associated with the advertisement.

- c) The potential impact on road safety through:
  - i. obstruction or impairment of site-lines;
  - ii. obstructing, confusing, or distracting the view of a road user;
  - iii. leaving insufficient vertical or lateral clearance for vehicles;
  - iv. confusion, glare, dazzle or distraction caused by lighting;
  - v. causing pedestrians to walk or stop in hazardous places;
  - vi. Misleading resemblance to road traffic signs.
- d) The potential impact on railway safety through impairment of the ability of railway personnel to recognize and interpret signals, warning boards, lights, signs and level crossings from the railway.
- e) The potential impact on the safety of aircraft through glare, resemblance to visual landing guidance signals, proximity to the flight path of aircraft, or impairment of radar or navigational aid equipment.

These factors will be interpreted as appropriate in the light of the other policies in this Plan and supporting guidance published by the council.

### **Reasoned Justification**

4.67 *Poorly-designed, and inappropriately located, adverts and signs can negatively impact the visual environment and lead to clutter and visual confusion. Therefore, it is important that adverts and signs are a conscious consideration and are integrated into the overall design of a development.*

### **Policy CD8: Advertisements Consultation Questions:**

- Is a new policy for advertisements helpful? Does this provide any additional guidance not otherwise covered by the Local Plan policies elsewhere in the document?
- In terms of detail is the proposed policy too detailed, not detailed enough, or about right?
- Is there anything missing that this policy should contain?
- Is there anything within the draft policy which should be amended or removed?

### **Crossovers**

4.68 Crossovers are created where a vehicle driveway is required to cross a pavement or verge to access a parking area within the curtilage of a residential property. In certain circumstances these crossovers require planning permission.

### **Non-Strategic Policy CD9: Crossovers**

Proposals for crossovers to access hardstandings in gardens will only be permitted where highway safety and the amenity of the street scene are not adversely affected; and the proposal will not result in a net loss of public on-street parking spaces.

### **Reasoned Justification**

4.69 *As a result of its development as a new town in the 1950s and 1960s a significant number of properties in the town were not built with drives or garages within the curtilage of their property, and there are limited on-street parking opportunities. Some residents therefore seek to provide hardstanding within their garden to provide parking spaces. Whilst the provision within a garden of a hardstanding does not always require a planning application, the crossing of a pavement or verge to access the space, if the property is on a classified road or the land crossed is not highway, does. The creation of a crossover can lead to the loss of on-street parking spaces so it is important that the level of this impact is assessed. Any proposal will also need to*

*be considered with regards to highway safety. Hardstandings and crossovers can also have a detrimental impact on the amenity of the street scene.*

#### **Policy CD9: Crossovers Consultation Questions:**

- Is this policy still valid?
- Are there any new matters which it should include?
- This policy is suggested to be a non-strategic policy – do you agree with that approach?

### **Inclusive Design**

4.70 It is essential to consider inclusive design at the earliest possible stand in a scheme's development, and inclusive design should be embedded into a project from initial conception through to completion, occupation and in the on-going management and maintenance of the development.

#### **Strategic Policy CD10: Inclusive Design**

Development proposals are required to achieve the highest standards of accessible and inclusive design possible, ensuring they:

- i. can be entered, used and exited safely, easily and with dignity by all;
- ii. are convenient and welcoming with no disabling barriers, providing independent access without undue effort, separation or special treatment; are designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

The Design and Access Statement, submitted as part of planning applications, should include an inclusive design statement.

All new dwellings must be capable of adapting to the changing needs of residents through the application of Building Regulations Part M Category 2 – accessible and adaptable dwellings. This will be secured through a planning condition. Plans submitted in support of relevant applications must clearly show how the Building Regulations will be met to this level. In exceptional circumstances, flexibility may be applied in the application of this policy requirement for:

- a. specific small scale infill developments;
- b. flats above existing shops or garages;
- c. stacked maisonettes where the potential for decked access to lifts is restricted.

### **Reasoned Justification**

4.71 *Crawley is projected to see a notable increase in the older person population, with the total number of people age 65 and over projected to increase by 55% over the next twenty years to 2039. In addition, approximately 30% of households contain at least one person with a long-term health problem or disability. It is likely that the age profile will impact upon the numbers of people with a long-term health problem or disability, and those people in the oldest age bands are more likely to experience these. Crawley's older population exceed the West Sussex levels and are close to the national average.*

4.72 *As it is not possible to know when a long-term health problem or disability may affect any individual, and the existing stock will continue to form the majority of housing*

available within the borough in the future, it is maintained that, unless there are exceptional, practical, circumstances which make meeting inclusive design criteria and, in the case of residential developments, the 'accessible and adaptable' Building Regulations levels impossible, these should be clearly illustrated on submissions as part of a planning application. Viability constraints will not be considered reasonable justification for not seeking to apply this policy, unless it can be demonstrated that consideration to meet the requirements had been taken into account from the early design and layout stages of development, and were shown to not be practicable or physically possible to achieve.

#### Policy CD10: Inclusive Design Consultation Questions:

- This policy is in addition to the housing space standards set out in policy CD11, is that clear from the policy wording?
- Is this policy justified and reasonable? What evidence is necessary to support the approach?
- Are the expectations of the policy for inclusive design appropriate, practical and comprehensive? Is there anything missing which should be included? Should any of the criteria not be included as a requirement?
- Are there any other exceptions which should be included in the policy?

### Standards for New Housing Development

- 4.73 Crawley has a reputation for providing good quality housing. This contributes to residents' quality of life and also to the character and identity of the town. Inadequate dwellings make it difficult for residents to undertake their day-to-day living activities or adapt their homes to address changes in circumstance and can cause problems for neighbours through disturbance or a lack of privacy.
- 4.74 Internal and external space standards have been successfully applied to new housing developments in the borough over the last twenty years. Nationally Described Space Standards were introduced in October 2015 and these are set out in the Policy.

#### Strategic Policy CD11: Standards for All New Dwellings (including conversions)

All new dwellings must create a safe, comfortable and sustainable living environment. The minimum size for each dwelling should be based on the Nationally Described Space Standards, as specified below (October 2015 or as subsequently updated).

**Table 1: Minimum floorspace standards for all new dwellings (GIA sqm)**

Number of Bedrooms	Occupancy	1 Storey	2 Storey	3 Storey	Built-in Storage
Studio (a)	1 person	37			1.0
Studio (b)	1 person	39			1.0
1 bedroom	2 person	50	58		1.5
2 bedroom	3 person	61	70		2.0
2 bedroom	4 person	70	79		2.0
3 bedroom	4 person	74	84	90	2.5
3 bedroom	5 person	86	93	99	2.5
4 bedroom	5 person	90	97	103	3.0
3 bedroom	6 person	95	102	108	2.5
4 bedroom	6 person	99	106	112	3.0
5 bedroom	6 person	103	110	116	3.5
4 bedroom	7 person	108	115	121	3.0
5 bedroom	7 person	112	119	125	3.5
6 bedroom	7 person	116	123	129	4.0
4 bedroom	8 person	117	124	130	3.0

<b>5 bedroom</b>	8 person	121	128	134	3.5
<b>6 bedroom</b>	8 person	125	132	138	4.0

1 person (a): with shower room; 1 person (b): with bathroom

Notes:

1. The dwelling provides at least the gross internal floor area and built-in storage area set out in Table 1 above.
2. A dwelling with two or more bedspaces has at least one double (or twin) bedroom.
3. In order to provide one bedspace, a single bedroom has a floor area of at least 7.5sqm. and is at least 2.15m wide.
4. In order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5sqm.
5. One double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide.
6. Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1sqm. within the Gross Internal Area).

New dwellings should have a minimum floor to ceiling height of the main living space of 2.3m for at least 75% of the Gross Internal Area. In exceptional circumstances, this may not be appropriate given the local design context.

Residential developments should be designed to include amenity space standards adequate to meet basic privacy, amenity and usability requirements; suitable for the likely level of occupancy. The Urban Design SPD provides further advice on provision of appropriate external space.

In addition to the Nationally Described Space Standards, the local authority will promote medium and higher density residential development where for 2 bedroom 4 person single storey dwellings the following is met:

- i. Gross internal floor area is a minimum of 80sqm.
- ii. All units are either dual aspect or where single aspect, south facing.
- iii. Have minimum floor to ceiling height in the main living space, hallway and kitchen of 2.7m.
- iv. Provide useable private outdoor space, at least 2.5m in depth x 4m wide, and accessed directly from main living areas or kitchen.
- v. Adequate additional space for recycling within the kitchen space, as per the requirements set down in 'building for life' criteria.
- vi. A minimum of 4.0sqm in built storage space within the dwelling.

**Reasoned Justification**

4.75 *Individuals need sufficient private space to undertake the normal functions of living together including recreational activities. The internal space standards are based on the designed level of occupancy as the number of occupants will fluctuate over the life of the dwelling. The starting point for the space standards is the need for rooms to be able to accommodate a basic set of furniture, fittings, activity and circulation space appropriate to the function of each room. The intention is to impede the development of and cumulative effects of unsuitable homes. Designers will be able to respond to market demands in terms of how the space is used or whether higher standards are required for commercial reasons, for example to accommodate en-suite bathrooms.*

4.76 *The minimum size for each dwelling is net space including the area enclosed by unfinished faces of walls of dwellings including space taken by stairs, general storage space, partitions, chimney breasts, flues etc. but excluding garages, dustbin, fuel and bicycle stores, balconies, porches and lobbies open to the air, areas within any room with ceilings less than 1.5 metres high and any area intended to function as an access way.*

4.77 *Minimum ceiling heights are important to ensure sufficient space and light in new dwellings, as incorporated in the emerging space standards. However, there may be*

*exceptional sites where this may not be appropriate in design terms, for example in Conservation Areas characterised by smaller building heights or adjacent to a Listed Building.*

- 4.78 *Sufficient external space is also required to protect the amenities of neighbours and to enable private gardens to contribute positively to the character and appearance of the area. Further guidance is provided by the Urban Design Supplementary Planning Document.*

**Policy CD11: Standards for All New Dwellings (including conversions) Consultation Questions:**

- Is it appropriate for Crawley to adopt the nationally described space standards, as set out in this policy?
- Are there circumstances in which exceptions should be made to the nationally described space standards? What are they and why are they justified?
- Is the approach taken by this policy in respect of outdoor amenity standards appropriate and justified? How could it be improved? Should the external space standards be provided in the Plan? This could either be in the Policy or the supporting text.

## Landscaping & Landscape Character

- 5.1 The green landscaping in and around the built environment is also a key part of Crawley's New Town character; as is the setting of the town, with a clear distinction between the urban area and countryside providing a sense of place for residents and visitors and ensuring accessible countryside remains within easy reach by foot.

### Chapter Content

- 5.2 This chapter sets out policies to guide the relationship between development proposals and key elements of Crawley's landscape character, both within the urban area and outside the Built-Up Area Boundary.
- 5.3 It covers landscaping criteria expected for all new development and the general planning policy considerations for development outside the Built-Up Area Boundary.

### The Key Issues

- 5.4 Soft landscaping forms a central part of Crawley's New Town heritage. As development pressures increase within the town and development land within the urban area becomes scarce, it is critical that this land is protected and improved and used to secure multiple benefits, wherever possible. However, as an urban area, new tree planting may not always be the best use of land, and other forms of soft landscaping and habitats could be a beneficial alternative in some cases.
- 5.5 Crawley's countryside is an extremely valuable leisure, amenity and environmental asset for the community, which should be conserved and enhanced in a positive way. This must be integrated with the need to achieve the Plan's wider vision and objectives to support sustainable development within the countryside. Similarly, it must be noted that the Character and Design Policies CD2, CD3, CD4b and CD5 are very relevant to these key issues also.

#### Landscaping & Landscape Character Chapter Consultation Questions:

- What soft landscape features do you particularly value in Crawley?
- Are there areas of Crawley which would benefit from more trees and/or soft landscaping?

### Local Plan Policies

#### Structural Landscaping

- 5.6 Crawley's green appearance is derived from historic landscape features combined with more recent additions attributable to the New Town masterplan and subsequent development. These features include large parks, open spaces, woods and woodland corridors, the cumulative impact of individual trees, wide verges, lakes and water courses, remnant moats, and former estate gardens that provide a distinctive and characterful quality to the town. Structural landscaping can be attractive in its own right or form a backcloth. Areas of soft landscape can also form part of the structure of the borough or act as a visual buffer, perhaps shielding unattractive areas from view or softening the impact of major roads. Development proposals should identify and protect existing assets and exploit opportunities that will enhance the landscape quality of the area.

## Strategic Policy LC1: Structural Landscaping

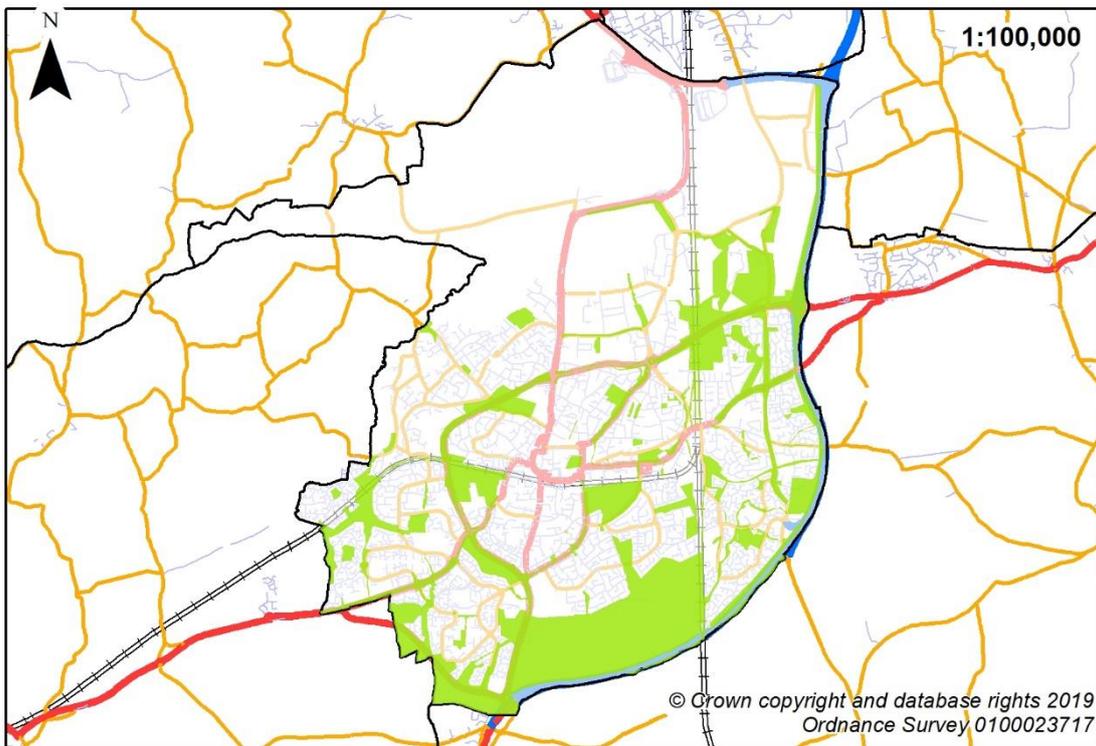
Areas of soft landscape that make an important contribution to the town and its neighbourhoods, in terms of character and appearance, structure, screening or softening, have been identified on the Local Plan Map. Development proposals that affect this role should demonstrate the visual impact of the proposals and should protect and/or enhance structural landscaping, where appropriate. In this regard, Policies CD3, CD4b and CD5 in particular also need to be considered in addressing the requirements of Policy LC1 in relation to landscaping.

Where limited or weak structural landscaping can be identified as a negative factor in the attractiveness of an area, opportunities will be sought to deliver enhancements as part of development proposals, this may include improvements to biodiversity and habitat creation where multiple benefits can be achieved.

New development must identify, protect and enhance the significant qualities of a site; its underlying landform, identity setting and character; and work with its grain, scale, and features. Proposals must demonstrate the understanding of how the site is experienced, perceived and enjoyed.

### **Reasoned Justification**

- 5.7 *This Policy seeks to ensure that development schemes identify and take account of existing structural landscape assets which are a positive element of the character of the town. The Policy also seeks to ensure that impacts on structural landscaping assets are not dealt with as an afterthought, but progressed as an integral part of the design of the scheme, including opportunities for improvements.*



Structural Landscaping (Policy LC1)

- 5.8 *To maximise multiple benefits of Structural Landscaping, where appropriate for the character of the area, these can also be designed and managed as meadows. Wild flower meadows and flower-rich habitats, such as meadows, are crucial to supporting pollinators by providing good sources of nectar and pollen throughout the summer*

and also shelter and nest sites. The council is committed to securing such enhancements wherever possible.

#### Policy LC1: Structural Landscaping Consultation Questions:

- Is this policy still justified?
- Is this policy clear regarding its intention and scope?
- Is there a need to include a non-strategic policy on general landscaping?

### Important Views

5.9 The borough of Crawley straddles the Low Weald and the High Weald National Landscape Character Areas, as defined by Natural England. A key characteristic of the High Weald is a well-wooded landscape rising above the Low Weald. The changes in levels, which can be as much as 75 metres, allow there to be views from lower lying areas to higher, wooded land along the southern edge of the borough and views from higher land across the borough. Studies, including the Crawley Baseline Character Assessment (2009), have identified the key views in the borough.

#### Strategic Policy LC2: Important and Valued Views

The following types of 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:

- Linear contained views

The robust tree planting that contains the views is essential to their quality and must be protected and/or enhanced. All new buildings, structures, signs and advertisements, parked vehicles and hard surfaced areas must therefore be well-screened by trees and other soft landscaping. Development proposals at the end of the view corridor must demonstrate that the view would be protected and/or enhanced.

The Boulevard view lies between the Morrisons supermarket and the Central Sussex College Tower. Any proposals in the area will be required to retain, or enhance, the vista or to replace it with public realm of equal, or greater, townscape value.

- Long distance views

The points from which the view can be enjoyed must remain unobstructed by development in the foreground. Where the view is to an identified feature, development is required to protect and/or enhance this feature.

#### Valued Views

More localised Valued Views are identified in Conservation Area Statements and other Supplementary Planning Documents. These form part of the special character of relevant areas. When considering development proposals which affect these views, the objective of protecting or enhancing them should be given appropriate weight in light of:

- i. Policies HA1-HA6 or other character or design policies relevant to the local area;
- ii. any national or local heritage-, design- or character-related designation in place for the area.

Area Character Assessments, when prepared, will further identify valued localised views. Where such work defines urban and landscape structure, the relationship between landscape, settlement and movement patterns, will be framed and founded upon both

long distance and linear views. Views out of a site or place are as important as defining from where there are the most important views into a site.

The visual impact of proposals affecting Important and Valued Views must be clearly and accurately demonstrated as part of the planning application submission, for example through the use of verified view montages and cross sections.

### **Reasoned Justification**

- 5.10 *The borough council has identified a number of important views which can be enjoyed from a publicly accessible viewpoint. These enable the viewer to appreciate an attractive or interesting view of areas of the borough that may include landscape features or built landmarks.*
- 5.11 *The location of viewpoints and the general direction of the view are identified on the Local Plan Map.*

#### Linear Contained Views

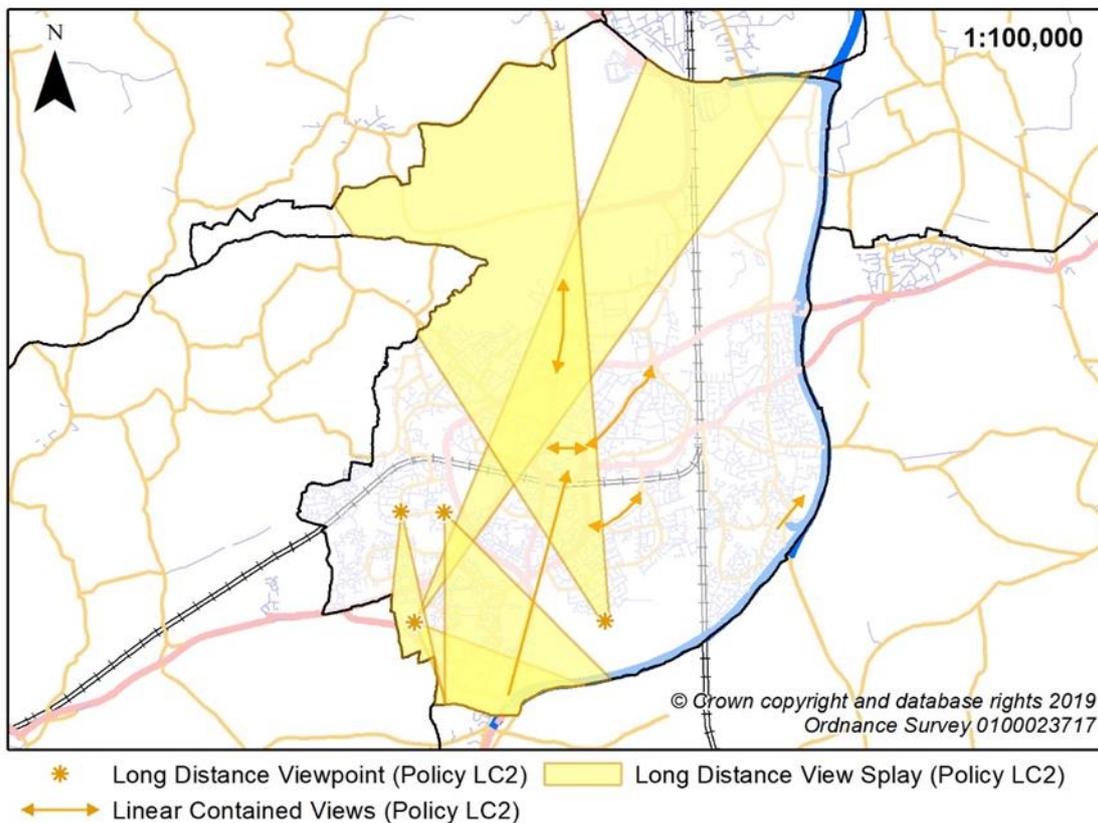
- **Balcombe Road:** View from Grayrigg Road and Balcombe Road towards the Grade I Listed Building, St. Nicholas' Church.
- **The Boulevard:** View between the western side of High Street to the Central Sussex College tower on the eastern side of College Road, enclosed by trees and buildings.
- **Brighton Road:** View from A23/A264 junction, northwards along Brighton Road, to the town centre. The view is contained by trees between the A23/A264 junction and the football stadium/K2 Crawley leisure centre.
- **Hawth Avenue:** View in two directions, enclosed by trees. Any redevelopment proposals on Russell Way have the potential to terminate the view from the north eastern end of Hawth Avenue, at the junction with Weald Drive.
- **London Road:** View between Tushmore Roundabout and Martyrs Avenue enclosed by trees and then up to County Oak Roundabout.
- **Northgate Avenue:** View in both directions between Northgate Roundabout and Central Sussex College, enclosed by trees.

#### Long Distance Views

- **Buckswood Drive:** Panoramic views, from vicinity of the northern junction with Kingscote Hill, to the south-east across trees associated with Broadfield Brook and adjacent open space to wooded areas east of Brighton Road and within Tilgate Park.
  - **Gossops Drive:** Long distance view southwards from Gossops Drive, between Cobnor Close and Eden Road, to the part of Target Hill that lies within the borough boundary.
  - **Target Hill:** Views from south-eastern side of the hill, from the vicinity of the junction of Hobbs Road and Edrich Road, to the north-east over the Broadfield Mosque, across the borough to distant hills, and to the south east over the wooded areas associated with Creasy's Brook, the Eddington Hill area and the portion of Pease Pottage Forest and the AONB that lie within the district.
  - **Tilgate Park:** Long distance views, northwards from the country park car park and the adjacent area of open space to the north, across Tilgate, Southgate and the town centre and beyond to Leith Hill, Box Hill and Colley Hill.
- 5.12 *The designation would not duplicate protection afforded to Listed Buildings or Conservation Areas. Important but more localised valued views and landmarks, i.e. less than approximately 200m, will be identified, protected and enhanced through Conservation Area, Area of Special Local Character or Locally Listed Building assessments. A number of the important landmarks in the borough are Listed Buildings and some are located within Conservation Areas, including St. Margaret's*

*Church, Ifield; St. Nicholas Church, Pound Hill; and the Church of St. John the Baptist near High Street, Northgate. These buildings are subject to national regulatory and policy controls which include requirements to protect their settings.*

- 5.13 *The views identified within Manor Royal will be protected and/or enhanced via development undertaken in accordance with guidance contained in the Manor Royal Design Guide SPD and through any works undertaken in accordance with the Manor Royal Public Realm Strategy.*



**Policy LC2: Important and Valued Views Consultation Questions:**

- Is this policy still justified?
- Is this policy clear regarding its intention and scope?
- Does this policy cover all the main views? Are there any others you are aware of which should be considered?
- Should a new view point from the high point at Rowley Farm be included?
- Is the approach taken by this policy in respect of 'Valued Views' appropriate and justified?
- Is there a need to include reference in the policy to other important localised views or to create a non-strategic policy to cover this?

**Tree and Landscape Character Planting**

- 5.14 Trees and soft landscaping makes an important contribution to the character and appearance of the borough and are beneficial in other ways including supporting biodiversity. Additional tree and/or landscape planting will be required to mitigate the visual impact of the intensification of buildings, hard surfacing parking and boundary treatments.

- 5.15 Good quality tree and landscape planting and soft landscaping can secure multiple benefits, wider than visual improvements, particularly where this involves habitat creation, through providing one or all of cover, food or water to a targeted species; choosing species for their air quality improvement properties; and where species provide mitigation and adaptation for the impacts of climate change. To maximise the multiple benefits from landscape planting detailed planning decisions and funding is required.
- 5.16 Where general habitat for wildlife is a goal, the preservation of existing sites is preferable to the development of new habitat – this is covered by Policy GI1, GI2 and GI3. Protection and retention of existing trees is covered below in Policy LC4, and the protection and enhancement of Structural Landscaping is covered by Policy LC1.

### Strategic Policy LC3: Tree and Landscape Character Planting

Landscape proposals for residential development should contribute to the character and appearance of the town by including at least one new tree, or equivalent soft landscaping, for each new dwelling, of an appropriate species and planted in an appropriate location.

The tree and soft landscaping planting requirements would normally be expected to be met within the development site. Where the local planning authority agrees that this is not feasible or desirable, commuted sums will be sought in lieu on a per tree, or equivalent alternative habitat, basis, taking account of constraints to planting. The approach would enable the green character and appearance of the borough to be maintained through tree planting on appropriate and available land.

The Manor Royal Design Guide SPD sets out tree planting requirements for sites in Manor Royal.

#### **Reasoned Justification**

- 5.17 *Trees make urban areas pleasant places in which to live and work and improve quality of life. The government is looking to highlight the main barriers and drivers to both planting new trees and habitats in urban areas. Trees are an important part of the character and infrastructure of the borough. All of the tree cover within the borough is considered an urban forest, irrespective of the use of the land on which the trees are growing. Similarly, there is a diverse range of habitats within Crawley and across the Sussex High Weald. The Local Plan seeks to secure more trees of better quality and longevity and improved and new habitats suited to the local character, particularly within the urban area.*
- 5.18 *When planting a tree, the existing sewerage and water supply infrastructure should be taken into account, as well as the choice of appropriate tree species for the ground conditions and environment.*
- 5.19 *The cost of off-site planting by the borough council, in lieu of provision on-site, will be based on the costs of tree provision as set out below in paragraph 5.23 or an equivalent alternative landscape habitat.*

#### **Policy LC3: Tree and Landscape Character Planting Consultation Questions:**

- This policy expands adopted Policy CH6 to beyond a solely tree focus, recognising the wider benefits of targeted and good quality landscaping. Do you agree with this approach?
- Are there specific types of landscaping which should be expressly referred to in the policy?
- Can you see any difficulties with implementing this policy equitably and consistently?

## Tree Replacement Standards

- 5.20 Existing trees can significantly contribute to the setting of new development, and can give the impression of early maturity and increased design quality. Development should retain individual specimens or groups of trees that make a positive contribution to visual amenity. This needs to be accounted for at an early stage. Where trees are agreed for removal as part of a development scheme, replacement trees will be required.

### Strategic Policy LC4: Tree Replacement Standards

Tree retention and provision needs to be accounted for at an early stage when designing the layout of new development. Following the completion of surveys and analysis of the site, consideration must be given to which trees are the most suitable for retention:

- i. Trees of the highest quality (those categorised as A and B trees in the Tree Survey) should be retained as part of the proposed layout.
- ii. Trees of moderate and low value (category C and below) should not automatically be considered for removal, as they may play a useful role in site screening, or as an important habitat feature.

Where development proposals would result in the loss of trees, applicants must identify which trees are to be removed and replaced in order to mitigate for the visual impact resulting from the loss of the tree canopies. Proposals must demonstrate that the number of replacements accords with the following requirements:

Trunk diameter of each tree (measured in cms at 1.5m above ground level) to be removed:	No. of replacement trees required:
Less than 19.9	1
20 – 29.9	2
30 – 39.9	3
40 – 49.9	4
50 – 59.9	5
60 – 69.9	6
70 – 79.9	7
80+	8

The girth of replacement trees will vary depending on species and location but should balance the need to reduce the likelihood of new tree stock failing to survive whilst providing visual amenity from the outset.

The replacement tree planting requirements would normally be expected to be met within the development site. Where the local planning authority agrees that this is not feasible or desirable, commuted sums will be sought in lieu on a per tree basis, taking account of constraints to planting. The approach would enable the green character and appearance of the borough to be maintained through tree planting on appropriate and available land.

The Manor Royal Design Guide SPD sets out tree planting requirements for sites in Manor Royal.

### Reasoned Justification

- 5.21 *Trees are considered to be a material consideration where planning permission is required. Trees existing on or adjacent to a development site (within falling distance) can present significant constraints upon development, often requiring expert advice to find an appropriate solution. Without appropriate consideration at an early stage of design, existing trees and hedges can be easily damaged and lost through development. Damage can occur to trees through thoughtless construction practices,*

such a vehicle collisions and root severance, as well as through more indirect factors, such as changes in the surrounding ground levels, compaction of the soil structure and contamination.

- 5.22 *A significant loss is incurred even when a new tree is planted to replace an older one that has been felled. Depending on the species, it takes between 15 and 40 years for a tree to grow a sufficiently large canopy to deliver meaningful aesthetic, air pollution removal, rainwater management and other benefits. In terms of biodiversity, the older the tree the richer the wildlife that it supports. To ensure that adequate compensation is delivered the diameter measurement is used as a basis for the number of replacement trees that would achieve a similar canopy cover. The policy ensures that the green character and appearance of the borough is maintained.*
- 5.23 *The cost of off-site planting by the borough council, in lieu of provision on-site, will be based on the cost of a sixteen to eighteen centimetre girth tree measured at 1.5m off the ground, planting, sundries and watering over a five year period to ensure that the tree becomes established. Where tree planting will occur within a hard paved area, the additional cost of construction for a tree pit must be funded.*

#### **Policy LC4: Tree Replacement Standards Consultation Questions:**

- Is this policy still justified?
- Does the policy strike a balance between the preference for tree retention and the need for flexibility to allow development to come forward to meet needs?
- Do you have any other comments regarding the tree replacement standards?

#### **Development Outside the Built-Up Area**

- 5.24 It is important that a vibrant multifunctional landscape around Crawley is encouraged, maximising its contribution to people's quality of life, wellbeing, the natural environment and the economy. The Crawley Borough Council Landscape Character Assessment has been used to set the criteria based policies which encourage proposals that respect the character and role of different areas. Policy EC9 of the Local Plan encourages small-scale economic development beyond the Built-Up Area Boundary, and there may also be limited opportunities for appropriate new residential development. Policy H3g sets out the criteria for urban extensions beyond Crawley's boundary, which would be within the countryside.

#### **Strategic Policy LC5: Development Outside the Built-Up Area**

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. Identify existing character and key assets, landscape and built forms, and recognise the significant qualities of the area, including its grain, aspect, scale, natural resources, views, sense of space and tranquillity to guide any new development;
- iii. Identify the strategic context of such settings and environments of the town, and respond intelligently to the underlying landscape and environmental systems and form;
- iv. Maintain a loose-knit, low density rural character clearly differentiating it from development within the urban area;

- v. Be located to avoid the loss of important on-site views and off-site views towards important landscape features, understanding how they function and how they are experienced and perceived;
- vi. 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). Where screening and existing character allows, careful, unique modern new design could be considered;
- vii. 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;
- viii. Ensure buildings and any external hard surfacing, parking areas, access roads and outdoor storage are not visually prominent in the landscape;
- ix. Avoid generating an unacceptable level and/or frequency of noise in areas relatively undisturbed by noise and valued for their recreational or amenity value;
- x. Avoid generating traffic of a type or amount inappropriate to the rural roads;
- xi. Ensure access to the countryside is maintained and enhanced from Crawley's neighbourhoods, in accordance with Policy OS3 and demonstrate how such areas can be better experienced; and
- xii. Avoid introducing a use which by virtue of its operation is not compatible with the countryside.

In addition to the above, 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 and set out below.

Certain types of development may alter one or more important elements that make up a Character Area or Edge. This is acceptable if its overall character and role is not compromised and measures are taken to limit impacts through mitigation and enhancement where possible. This may be the strengthening of other elements of the area's character or general enhancement through increased biodiversity, green links and other mitigation measures as detailed in the Landscape Character Assessment.

Proposals which alter the overall character of the area must demonstrate that the need for the development clearly outweighs the impact on landscape character and is in accordance with national and local policy. Mitigation and/or compensation will be sought in such cases where this can be proven. Applicants are advised to consider the enhancement opportunities identified in the Crawley Borough Landscape Character Assessment.

#### North East Crawley High Woodland Fringes

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.

#### Upper Mole Farmlands Rural Fringe

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 identity of Gatwick Airport from Crawley and the valuable recreational links from the northern neighbourhoods of Crawley into the countryside.

B Use Class development abutting Manor Royal (Policy EC3) and residential development and/or commercial development in the area immediately north of Langley Green and within the Search Corridor for the Western Relief Road (Policy ST4), as shown

as an Area of Search on the Key Diagram, may be suitable within this area where it constitutes a comprehensively planned extension and meets criteria i-x of this policy in its relationship with the surrounding countryside.

#### West of Ifield Rural Fringe

Proposals which respect this area of locally special rural fringe, its nature conservation and recreation value, its positive relationship with the urban edge and links to the wider countryside will be encouraged.

#### West of Gossops Green/Bewbush Rural Fringe

The green infrastructure along Bewbush Brook and Spruce Hill Brook is of high value and should be protected and linked to green infrastructure in the new neighbourhood, Kilnwood Vale and where other opportunities arise.

#### South of Broadfield into Buchan Hill Forest and Fringes

The green fingers and local nature reserve will be conserved as they provide existing green infrastructure links with potential for improvement to accessing the countryside and wildlife corridors. The area is valued for its quiet recreational opportunities which should be maintained. Proposals should not conflict with the High Weald AONB Management Plan objectives.

#### Tilgate/Worth Forest and Fringes

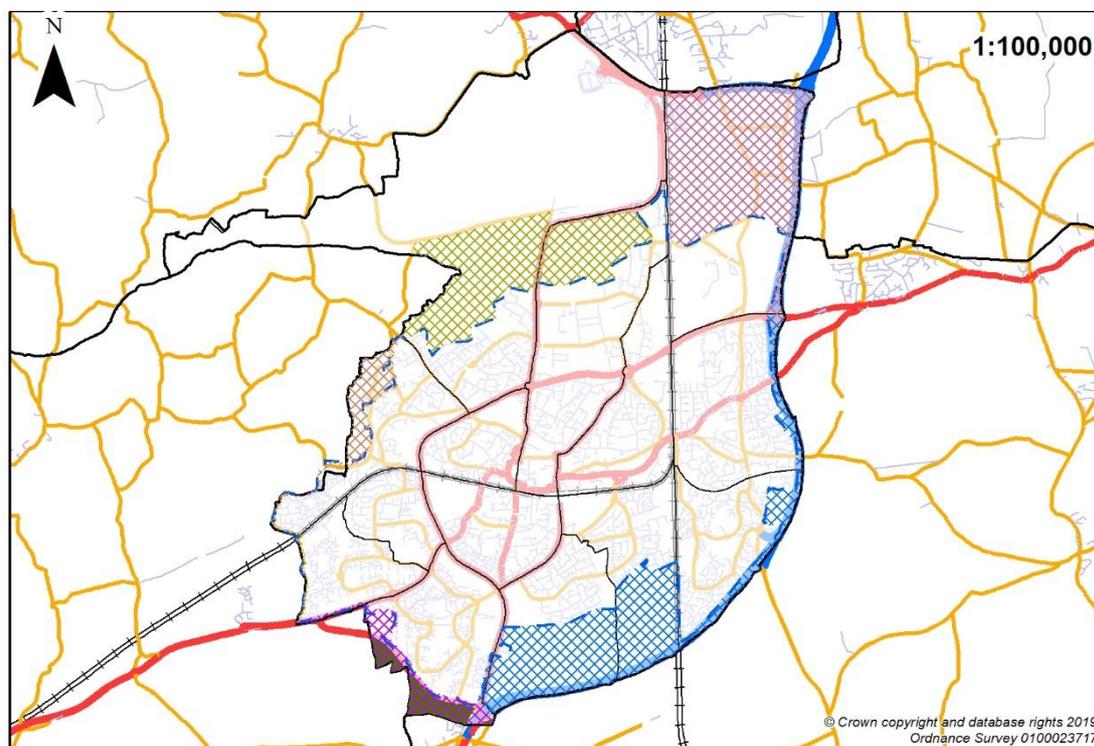
Proposals within Tilgate Country Park and Worth Conservation Area/Worth Way SNCI should conserve their high landscape value and potential for improved green infrastructure links to other areas.

Where development is proposed close to, or within, the High Weald Area of Outstanding Natural Beauty, it should be planned and designed in accordance with Policy LC6.

### **Reasoned Justification**

- 5.25 *The NPPF requires planning authorities to set criteria based policies against which proposals for any development within or affecting landscape areas will be judged.*
- 5.26 *Beyond the Built-Up Area Boundary lays the urban/rural fringe which forms an important landscape setting for the town. The nature, extent and spatial significance offered by differing rural settings and features offer differing advantages to the overall form, landscape and urban structure of Crawley. Certain features will be understood in the context of the borough as a whole whilst others contribute to very local environments. Rural fringe areas require a policy approach which respects their unique character and role whilst also encouraging sustainable development which can enhance access and interaction with the area from Crawley's neighbourhoods. To achieve this, a well-designed approach to the urban/rural fringe is required, which relates development at the periphery to its rural setting, maintaining the character of Crawley as a compact town with good access to the countryside. It is important to ensure the rural fringe does not become incrementally more suburban in nature which would conflict with the overarching principles on meeting the presumption in favour of sustainable development (Policy SD1: Presumption in Favour of Sustainable Development) and will be resisted. Urban extensions will be in the countryside outside Crawley's boundary and need to be properly planned to ensure the important contribution of the rural landscape setting for Crawley's neighbourhoods is not lost. The visual, spatial and environmental aspects of their landscape setting must be fully assessed and any development planned to protect and enhance important aspects. This is covered in more detail in Policy H3g.*
- 5.27 *Sites immediately adjacent to Manor Royal, which fall outside of the area subject to safeguarding through Policy GAT2, will be considered favourably for minor extensions to the Main Employment Area. Similarly, land immediately north of Langley Green and within the Search Corridor for the Western Relief Road may be*

suitable for housing and/or employment floorspace. Appropriate development in these locations must continue to be respectful of the adjoining countryside setting and ensure adequate landscaping, screening and design of buildings to minimise intrusion of the urbanised area on the rural fringe boundary. Where planning permission is implemented, the Built-Up Area Boundary will be reviewed and any new development should provide a defensible new boundary.



- |  |  |
|--|--|
|  Bewbush Rural Fringe (Policy LC5)              |  High Weald Area of Outstanding Natural Beauty (Policy LC6) |
|  North East Crawley Rural Fringe (Policy LC5)   |  Built-Up Area Boundary (Policy LC5)                        |
|  South of Broadfield Rural Fringe (Policy LC5)  |  |
|  Tilgate/Worth Forest Rural Fringe (Policy LC5) |  |
|  Upper Mole Farmlands Rural Fringe (Policy LC5) |  |
|  West of Ifield Rural Fringe (Policy LC5)       |  |

#### Policy LC5: Development Outside the Built-Up Area Consultation Questions:

- Is this policy still valid?
- Are there areas which have already undergone substantial change in character which would need reconsideration?

### High Weald Area of Outstanding Natural Beauty

5.28 The High Weald Area of Outstanding Natural Beauty is a nationally important landscape where great weight should be given to conserving the landscape and scenic beauty of the designation. A small area of the AONB lies within the southern boundary of the borough.

## Strategic Policy LC6: High Weald Area of Outstanding Natural Beauty

The council will conserve and enhance the natural beauty and setting of the High Weald AONB by having particular regard to the High Weald AONB Management Plan in determining development proposals affecting the AONB.

Where development is proposed close to, or within, the High Weald Area of Outstanding Natural Beauty, consideration of both the visual impacts on the intrinsic scenic qualities of the AONB and the impacts of its landscape character or features, must be provided within submitted landscape character assessments.

### **Reasoned Justification**

- 5.29 *The borough council has a statutory duty to conserve and enhance the natural beauty of the High Weald AONB.*
- 5.30 *A small area to the south of the borough forms part of the AONB; proposals for which will be judged against the guidelines and advice of the High Weald AONB Management Plan. The plan provides a transparent and accessible means by which the council can ensure that it is exercising its duty to have regard to the purposes of designation<sup>31</sup> and providing a guide for everyone involved with the actions they can take to care for the area.*

### **Policy LC6: High Weald Area of Outstanding Natural Beauty Consultation Questions:**

→ Should this policy include the key requirements from the High Weald Management Plan?

<sup>31</sup> Section 85, Countryside and Rights of Way Act 2000

## Heritage Assets

- 6.1 Many historic elements of the original built environment have been retained as the town has grown, leading it to be included in the joint English Heritage, West and East Sussex County Councils' Extensive Urban Survey project (EUS). These elements blend with the original New Town architecture and more modern design to contribute to Crawley's unique character.
- 6.2 Crawley's history can be traced as far back as the Stone (Neolithic) Age, with flint tools and burial mounds and later a Bronze Age sword found in the area. Iron Age forts were established to extract ore in the areas now covered by Broadfield, Bewbush and Southgate and an Iron Age camp was once on the site of Goffs Park.
- 6.3 The town itself is a mixture of three parishes, including Ifield and part of Worth, both of which are mentioned in the Domesday Book of 1086. Crawley's oldest building, Worth Church, originates from Saxon times. The first mention of Crawley comes from 1203, when a licence to hold a weekly market was granted.
- 6.4 In 1946, the New Towns Act was passed; Crawley was one of eight New Towns selected to provide work and homes away from the overcrowded capital. Crawley New Town was built around the three original settlements of Three Bridges, Crawley and Ifield, based on the Minoprio masterplan. This has resulted in a borough with a rich and diverse array of heritage assets from Grade I listed structures hundreds of years old to excellent examples of New Town architecture and planning.

### Chapter Content

- 6.5 This chapter sets out heritage policies to guide development proposals. The policies set out below relate to a number of separate but interrelated designations to protect and enhance the borough's historic assets.

### The Key Issues

- 6.6 As a New Town, much of Crawley's built environment has been constructed over the last 60 years, and many residents particularly value those heritage assets that predate this period. This is reflected in the areas and buildings that are currently afforded protection as Conservation Areas or Listed Buildings. There is, however, increasing recognition of the value of some of the "New Town" buildings that have been built since 1947. Many of these assets are locally distinctive and, therefore, it is of importance to have a clear approach for enhancing and protecting them.

#### Heritage Assets Chapter Consultation Questions:

- What does 'heritage' mean to you?
- What aspects of Crawley's pre-New Town heritage are most valuable?
- What aspects of Crawley's New Town heritage are most valuable?
- Are there aspects of Crawley's heritage which are under-appreciated?
- Are there any ways in which the approach to conserving heritage in Crawley should differ from the approach taken elsewhere in the country?

### Crawley's Heritage Assets

- 6.7 Heritage makes a positive contribution to the local character of an area and helps define what makes Crawley distinctive. It is, therefore, a priority for development to ensure that it respects all aspects of the town's built and natural heritage.
- 6.8 The council adopted a Heritage Strategy in 2008 and considerable work has been undertaken since to identify and protect the locally distinctive built and natural heritage assets in the borough that may not be designated nationally. The Heritage Strategy highlighted the importance of Crawley's social heritage, linking residents' experiences of living and working in the town with the built and natural environment.

### Strategic Policy HA1: Heritage Assets

Crawley's heritage designated and non-designated assets include:

- Listed Buildings (see also Policy HA4);
- Scheduled Ancient Monuments;
- Conservation Areas (see also Policy HA2);
- Locally Listed Buildings (see also Policy HA5)
- Areas of Special Local Character (see also Policy HA3);
- Historic Parks and Gardens (see also Policy HA6);
- Other assets with archaeological interest, especially within Archaeological Notification Areas in Crawley identified by West Sussex County Council.

All development should respond to these as a finite resource, providing a distinctive combination of social, economic and environmental benefits. Proposals should ensure that heritage assets' key features or significance are not lost as a result of development.

Where a development affects a heritage asset or the setting of a heritage asset, a Heritage Impact Assessment will be required. This should describe the significance of any heritage assets affected and the contribution made by their setting, the impact of the development, and any measures adopted to ensure the heritage asset is respected, preserved or enhanced or, for exceptionally significant development, relocated. Where a development proposal meets criteria set out in the council's Local List of Planning Requirements, the accompanying Heritage Impact Assessment must include, and be informed by, the findings of a search of the Historic Environment Record (HER) and/or an Archaeological Desk-based Assessment.

If, in exceptional circumstances, a heritage asset is considered to be suitable for loss or replacement, and it has been demonstrated its site is essential to the development's success, proposals will need to demonstrate how they have recorded the heritage asset:

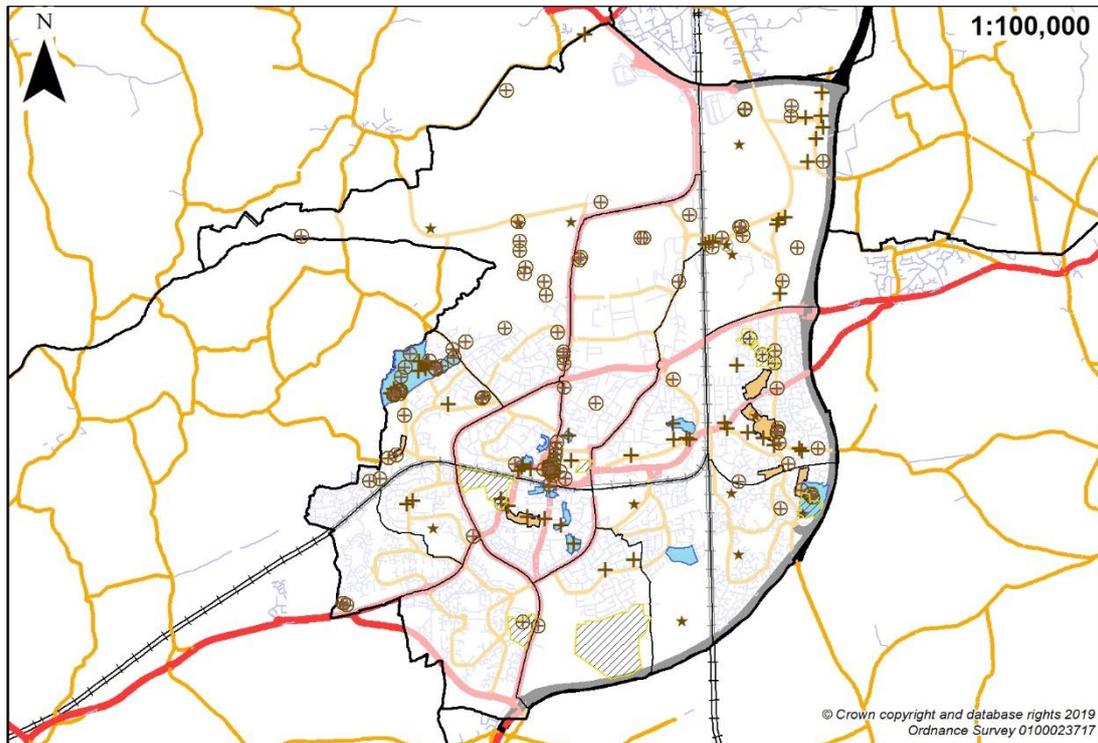
- i. in line with a written scheme of investigation submitted to, and approved by, Crawley Borough Council; or
- ii. in the case of standing structures, to a minimum of Historic England recording Level 2, or higher if specified by the council.

Applicants are also required to notify any relevant parties including Historic England and submit their recording to the Historic Environment Record.

Applicants should demonstrate that the benefits of the entire scheme outweigh the loss of the asset and that any replacement scheme makes an equal contribution to local character and distinctiveness.

### Reasoned Justification

6.9 To help inform the council's heritage policy approach, the Crawley Areas of Special Environmental Quality and Locally Listed Buildings Heritage Assessment (April 2010) undertakes a comprehensive assessment of the town's heritage assets to review the status of current Conservation Areas, Areas of Special Environmental Quality (ASEQs) now known as ASLC's, Listed Building and Locally Listed Building designations. Its findings form a key aspect of the Local Plan evidence base and its findings, in addition to other relevant policy documentation, should be considered in the application of heritage policies.



-  Historic Parks & Gardens (Policy HA1 & HA6)
-  Conservation Areas (Policy HA1 & HA2)
-  Listed Buildings (Policy HA1 & HA4)
-  Areas of Special Local Character (Policy HA1 & HA3)
-  Locally Listed Buildings (Policy HA1 & HA5)
-  Archaeologically Sensitive Areas (Policy HA1)
-  Scheduled Ancient Monuments (Policy HA1)

6.10 Recording any heritage assets to a minimum of Historic England Level 2<sup>32</sup> will ensure that a descriptive record of all heritage assets are maintained in the HER. This will in turn inform future proposals affecting heritage assets in line with the NPPF. With regard to the setting of any heritage assets, consideration should be had to Historic Environment Good Practice Advice in Planning Note 3: the Setting of Heritage Assets<sup>33</sup>.

6.11 As heritage assets within the borough are a limited and finite resource, development proposals must show through a Heritage Impact Assessment (HIA) how they preserve and enhance the asset. In the case of exceptionally significant development, the asset should be relocated as part of the development proposals. In

<sup>32</sup> "Understanding Historic Buildings. A Guide to Good Recording Practice" (2016) Historic England

<sup>33</sup> Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017) Historic England

*exceptional circumstances when the asset is to be lost, it must be appropriately recorded and replaced with high quality development.*

#### **Policy HA1: Heritage Assets Consultation Questions:**

- Is it helpful for this policy to list types of heritage asset?
- Are there any types of heritage asset which should be added to, or removed from, the list?
- Do the requirements outlined in the policy in respect of Heritage Impact Assessments adequately reflect the national policy requirement that the council 'should require an applicant to describe the significance of any heritage assets affected, including any contribution to their setting.'
- Are the requirements set out in the policy in respect of cases where the loss or replacement of a heritage asset is proposed appropriate and justified?
- Are there elements of the policy which are unclear, or words which require further explanation within the policy text or elsewhere?

### **Conservation Areas**

- 6.12 In a Conservation Area, every building matters as well as the streets, public spaces and gardens between them – with each feature contributing to the unique character of the area. By understanding what gives each Conservation Area its special architectural or historic interest, it can be ensured that the special character and appearance of the area is preserved and enhanced. This is done with the use of additional controls over what can be done to buildings, trees and the overall appearance of the area.
- 6.13 The special character of these areas does not come from the quality of their buildings alone, but also from the historic layout of roads, paths and boundaries; characteristic building and paving materials; a particular 'mix' of building uses; public and private spaces – such as gardens, parks and greens; and trees and street furniture. Conservation Areas give wider protection to the area and setting, rather than focusing solely on individual buildings – all of the features within the area should be recognised as part of its character.

#### **Strategic Policy HA2: Conservation Areas**

Development within a Conservation Area should individually and cumulatively result in the preservation or enhancement of the character and appearance of the area.

All development within a Conservation Area should conform to the relevant Conservation Area Statement and Appraisal, and be designed according to the following principles:

- i) respect the protected area and recognise the identifiable, and distinctive, character(s);
- ii) avoid loss of, or harm to, architectural or decorative features or details making a significant contribution to the Area's significance;
- iii) respect any historic landscape features which affect the character of the place;
- iv) maintain and enhance the area's landscape value with regards to mature trees, hedges and public green spaces such as grass verges;
- v) respect and enhance the character of lower density developments with spacious landscaped settings. This includes areas of landscape dominating the buildings, the significant gaps between the buildings, the set back from the street, as well as any large gardens, mature trees, hedges and green verges; and
- vi) preserve the area's architectural quality and scale.

Conformity with the requirements of this Policy should be demonstrated as part of the Heritage Impact Assessment.

There may be structures within a Conservation Area which are not heritage assets and do not positively contribute to its character or appearance. Therefore, proposals for demolition of these structures will be considered on a case-by-case basis and may not be required to submit a recording to the Historic Environment Record. For such developments early pre-application discussions are encouraged.

### **Reasoned Justification**

- 6.14 *Under the Planning (Listed Buildings and Conservation Areas) Act 1990, the council have a duty to determine which parts of their area are of a character or appearance of which it is desirable to preserve or enhance. They must then designate those areas as Conservation Areas. The approach to Crawley's heritage has been developed by using Historic Environment Good Practice Advice Notes 1, 2 and 3, published by Historic England.*
- 6.15 *In 2013, after a review of the borough's heritage, three new areas were designated and two existing areas were extended. There are currently eleven Conservation Areas in the borough, each very different in character and appearance, protecting New Town areas and much older parts of Crawley. The Conservation Areas are:*
- Brighton Road
  - Dyers Almshouses
  - Forestfields and Shrublands
  - Hazelwick Road
  - High Street
  - Ifield Village
  - Malthouse Road
  - St Peter's and St John's
  - Southgate Neighbourhood Centre
  - Sunnymead Flats
  - Worth.
- 6.16 *It is important to protect, maintain and enhance these areas for future generations to enjoy. The main objectives of Conservation Areas are to protect and enhance the area's architectural and historic interest, its distinctive layout and appearance, and the built and natural environment. It is, therefore, important to ensure that any alterations or development are consistent with, and respectful of, the special character or appearance of the area.*
- 6.17 *The NPPF encourages the local planning authority to consider the designation of Conservation Areas and to ensure that these areas justify such status because of their special architectural or historic interest. The council has carried out a detailed assessment of the borough's heritage in the preparation of this Local Plan and believes that the existing and newly designated Conservation Areas are worthy of the status. In line with the significance and quality of these areas, the Policy sets appropriate requirements to ensure that development would result in their preservation or enhancement.*

### **Policy HA2: Conservation Areas Consultation Questions:**

- Is this policy justified and necessary?
- Are the requirements of the policy appropriate and proportionate given the scope and status of the 'Area of Special Local Character' designation?
- Is there any wording in the policy which requires further explanation, either in the policy itself or elsewhere?

## Areas of Special Local Character

- 6.18 Crawley has a unique history. The area developed organically up until the birth of the New Town which was planned and constructed around the existing settlement and the villages of Three Bridges, Worth and Ifield. Since the completion of the New Town, based on the Minoprio masterplan, the town has maintained the neighbourhood principle throughout its subsequent extensions. As a result of this there are some low density residential areas of special character. These areas are heritage assets and should be afforded protection to prevent them being lost, incrementally or at once.

### Strategic Policy HA3: Areas of Special Local Character

All development within an Area of Special Local Character (ASLC) should respect or preserve the character of the area and be designed with regard to the areas existing character and appearance. Proposals should be of an appropriate scale, design and massing, and should not result in significant adverse impact on the locality, its setting and important or valued views.

All development within an ASLC should demonstrate, as part of the Heritage Impact Assessment, how the proposals have regard to the area's designation and the character and appearance of the area.

### Reasoned Justification

- 6.19 *The “Crawley ASEQ’s and Locally Listed Buildings Heritage Assessment 2010” reviewed the previous Area of Special Environmental Quality designation and concluded that some should be designated, whilst others de-designated or made a Conservation Area. The report stated that to be designated as an Area of Special Local Character the area should be characterised by one or more of the following qualities:*
- i. Homogenous areas recognisable as possessing an identifiable, distinctive and cohesive character.*
  - ii. Areas where historic landscape features are evident and affect the character of the place, such as banks created by drover’s roads.*
  - iii. Areas of landscape value with mature trees, hedges and a high proportion of non-equipped public green space, e.g. grass verges.*
  - iv. Mature lower density developments of substantial houses with spacious landscaped settings where the landscaping dominates the buildings. They are characterised by large detached houses with significant gaps between the buildings, set back from the street, with large gardens, mature trees, hedges and green verges.*
  - v. Areas of architectural quality.*
- 6.20 *With this criterion in mind, the purpose of the ASLC designation is to:*
- a. Protect features of the historic and natural landscape such as mature trees, hedges, green verges, historic banks.*
  - b. Protect the low density character of the area and control the size of building extensions and infill development.*
  - c. Protect the variety of different types of residential development in the borough.*
  - d. Control the demolition of buildings and the character of development in areas of architectural quality.*
- 6.21 *ASLC’s are designated at the following locations, and illustrated on the Local Plan Map:*
- *Blackwater Lane, Pound Hill*
  - *Church Road, Pound Hill*
  - *Goffs Park Road, Southgate*
  - *Mount Close and Barnwood, Pound Hill*

- Milton Mount Avenue, Pound Hill
- Rusper Road, Ifield.

6.22 The NPPF asks local authorities to set out a positive strategy for the conservation and enjoyment of the historic environment; this Policy achieves this by designating special local heritage assets that should be preserved or enhanced and setting out the criteria required to achieve this.

#### Policy HA3: Areas of Special Local Character Consultation Questions:

- Is the requirement that development should 'individually and cumulatively result in the preservation or enhancement of the character and appearance' of a Conservation Area reasonable and proportionate?
- Do the principles set out in this policy adequately reflect the ways in which development should be expected to respond to the Conservation Area designation and the character or appearance of Crawley's Conservation Areas?
- Should the policy include specific provisions in respect of any individual Conservation Areas or groups of Conservation Areas? If so, what form should these take?

### Listed Buildings and Structures

6.23 All Listed Buildings have unique character and importance to the town and the nation. Therefore, their protection from inappropriate development is important.

#### Strategic Policy HA4: Listed Buildings and Structures

To recognise the value of Listed Buildings (including Listed Structures) within Crawley, the council will ensure that any proposed works to them are consistent with the character, appearance and heritage interest of any statutory Listed Building/Structure, in line with national legislation, policy and guidance.

Any changes must preserve or enhance the design and character of the Listed Building and have regard to its historic 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.

Listed Buildings should be retained and, therefore, the demolition, or part thereof, of a Listed Building will only be acceptable in exceptional circumstances, where:

- there are clearly defined reasons why the building cannot be retained in its original or a reasonably modified form; and
- a significant benefit that cannot have accommodated the retention of the building can be demonstrated.

If demolition is seen to be acceptable, the council will require the building to have been recorded to Historic England Level 4 and submitted to the Historic Environment Record. Any development on the site of a demolished Listed Building must have regard to the character, form and heritage significance of the original building.

#### Reasoned Justification

6.24 There are 3 Grade I; 12 Grade II\*; and 90 Grade II Listed Buildings in Crawley. The oldest dating from the 10<sup>th</sup> Century: Saxon St. Nicholas' Church, Worth, Pound Hill, to the 20<sup>th</sup> Century: including The Beehive (1934-6) and the Friary Church of St. Francis and St. Anthony (1958-9).

#### Policy HA4: Listed Buildings and Structures Consultation Questions:

- Is this policy justified and necessary?
- Are the requirements of the policy proportionate given the importance of statutory listing as a form of heritage designation?
- Should the policy include provisions in respect of specific groups of Listed Buildings, Listed Buildings in particular locations, or individual Buildings?

### Locally Listed Buildings

6.25 There are many buildings within Crawley that are of particular local architectural or historical interest. These buildings are not considered to be of national significance but are local heritage assets that are irreplaceable. These buildings should be retained wherever possible, as they make an important contribution to the borough's heritage and character. Such buildings are included on the council's Local Building List.

#### Strategic Policy HA5: Locally Listed Buildings

All development will seek to secure the retention of buildings included on the Crawley Borough Local Building List. Development should also maintain features of interest, and respect or preserve the character or setting of the building.

Development proposals affecting a Locally Listed Buildings must demonstrate in the Heritage Impact Assessment that the proposals take account of its heritage significance, including the following aspects of the building and its setting:

- i) Historic interest;
- ii) Architectural interest;
- iii) Townscape value;
- iv) Social and communal value.

Proposals seeking the demolition or partial demolition of a Locally Listed Building may be acceptable in exceptional circumstances if the development proposals:

- a) reflect or retain the key features of the original building; and
- b) significantly outweigh the merit of retaining of the original building with regard to social, economic and environmental benefit to the wider area.

If demolition is seen to be acceptable, the building must first be recorded up to Historic England Level 4, unless previously agreed with the Local Planning Authority, and the record must be submitted to the Historic Environment Record in consultation with the Local Authority.

The council will also assess the merit of designating new locally listed buildings in consultation with local residents and will define the characteristics of the buildings that warrant this level of protection.

### Reasoned Justification

6.26 *National planning guidance states that while the best examples of local vernacular building types will normally be listed, there are many other buildings which are valued for their contribution to the local scene or for their local historical association. It suggests that local planning authorities draw up lists of locally important buildings and formulate policies for their protection. In 2010, Crawley Borough Council revised its list which contained 58 buildings of local interest. The adopted local list of buildings can be found on the council's website at [www.crawley.gov.uk](http://www.crawley.gov.uk).*

#### Policy HA5: Locally Listed Buildings Consultation Questions:

- Is this policy justified and necessary?
- Are there any aspects of the heritage significance of Locally Listed Buildings, as a class of heritage asset, which should be added to the policy?
- Are the requirements set out in cases where the demolition or partial demolition of a Locally Listed Building is proposed proportionate and justified?
- Is there any wording within the policy which should be further explained, either within the policy or elsewhere?

### Historic Parks and Gardens

6.27 Crawley currently has six areas locally designated as a Historic Park or Garden. These sites are worthy of protection for their historic interest. Some are of particular interest as they were important features of the area before the development of the New Town, and some are intrinsically linked with the development of the New Town. These areas are now attractive landscaped areas which are locally valued, adding to the local character of Crawley.

#### Strategic Policy HA6: Historic Parks and Gardens

The following sites are designated and shown on the Local Plan Map as Historic Parks and Gardens:

- Worth Park;
- Land South of St Nicholas' Church;
- Broadfield Park;
- Tilgate Park;
- Goffs Park;
- Memorial Gardens.

The council will support development, unless it will have a negative impact upon the historic setting and character of the designated Historic Park or Garden.

All development proposals within the boundaries of the Historic Parks and Gardens as identified on the Local Plan Map will be required to demonstrate, through a Heritage Impact Assessment, that the proposals have regard to the designation, its character, key features and the setting of the area and that proposals respect or enhance the area.

### Reasoned Justification

- 6.28 *Whilst Crawley does not have any Parks and Gardens of Special Historic Interest that are designated as nationally important by Historic England, there are locally important areas that are worthy of protection in the Crawley context. This does not mean that development is always unsuitable in these areas but that the historic setting and character of that area must be respected or enhanced.*
- 6.29 *The council will ensure that the concept of historic parks and gardens is not devalued by only designating those areas of special interest identified through a robust assessment of their historic interest. The council assessment and the requirement for a Heritage Impact Assessment will serve to avoid or minimise conflict between the conservation of the area and any aspect of a planning proposal. This will ensure a balanced judgement is made having regard to the scale of any harm or loss and the significance of the heritage asset.*

**Policy HA6: Historic Parks and Gardens Consultation Questions:**

- Is this policy justified and necessary?
- Are the requirements set out in the policy proportionate to the significance of Crawley's Historic Parks and Gardens as a heritage asset?
- Does the policy need to explain more clearly what is meant by 'the historic setting and character' of a Historic Park and Garden?

## Open Space, Sport & Recreation

- 7.1 Throughout the urban area and on the fringes of the town there are many sites that are important for recreation from the wooded and open areas of grass in between houses to large local nature reserves and public parks. These areas make up a network of green space that support natural processes and are integral to the health and quality of life of the population. Most of Crawley's waterways flow underneath the urban area but also have an important leisure, visual and economic role in places such as Ifield Mill Pond and Tilgate Lake.
- 7.2 Crawley's open spaces, sports facilities and recreational areas are important to the health and wellbeing of the community. These spaces make up most of the green infrastructure network of the town, providing environmental benefits as well as enhancing its character, making Crawley a pleasant place to live, work or visit.

### Chapter Content

- 7.3 This chapter sets out policies to guide the relationship between development proposals and open space needs and enhancement of the borough's sports and recreation offer.

### The Key Issues

- 7.4 With an increasing population and the consequent need for development, the impact on the natural environment is a key issue. The planning policies in this chapter will ensure that Crawley's environment is enhanced as Crawley grows and changes over the next 15 years. A number of challenges to address the sustainable future of the borough exist.
- 7.5 The number and quality of open space sites has come under increasing pressure from both new development and maintenance budgetary constraints. With the need for new housing, Crawley's economic role within the Gatwick Diamond, and a limited supply of development land it may be that some of these sites are considered as a potential supply of land. It is important that a balance is struck between meeting these development needs whilst continuing to ensure a sufficient supply of high quality open space and sports provision to meet the needs of existing and future residents.

#### Open Space, Sport and Recreation Chapter Consultation Questions:

- Which open spaces, sports or recreational facilities in Crawley are most important to you?
- Are there any recreational facilities you would like to see provided in Crawley between 2020 and 2035?
- Are there areas of Crawley that could benefit from greater enhancement of open space, sport facilities or recreational spaces?

### Local Plan Policies

#### Sport, Recreation and Open Space

- 7.6 This policy sets out the criteria the council will use to determine proposals that affect open space, sport and recreation provision.

- 7.7 It is important to ensure that there is an adequate supply of open space to serve the needs of both the existing and the future population of the borough. The Open Space, Sport and Recreation Study and Playing Pitch Study has defined new standards for sport and recreation provision in the borough based on an assessment of the adequacy of existing provision, and the need for future sport and recreation development defined through consultation.
- 7.8 Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision<sup>34</sup>.

### Strategic Policy OS1: Open Space, Sport and Recreation

Proposals that remove or affect the continued use of existing open space, sport and recreational spaces will not be permitted unless:

- a) An assessment of the needs for open space, sport and recreation clearly show the site to be surplus to requirements; or
- b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

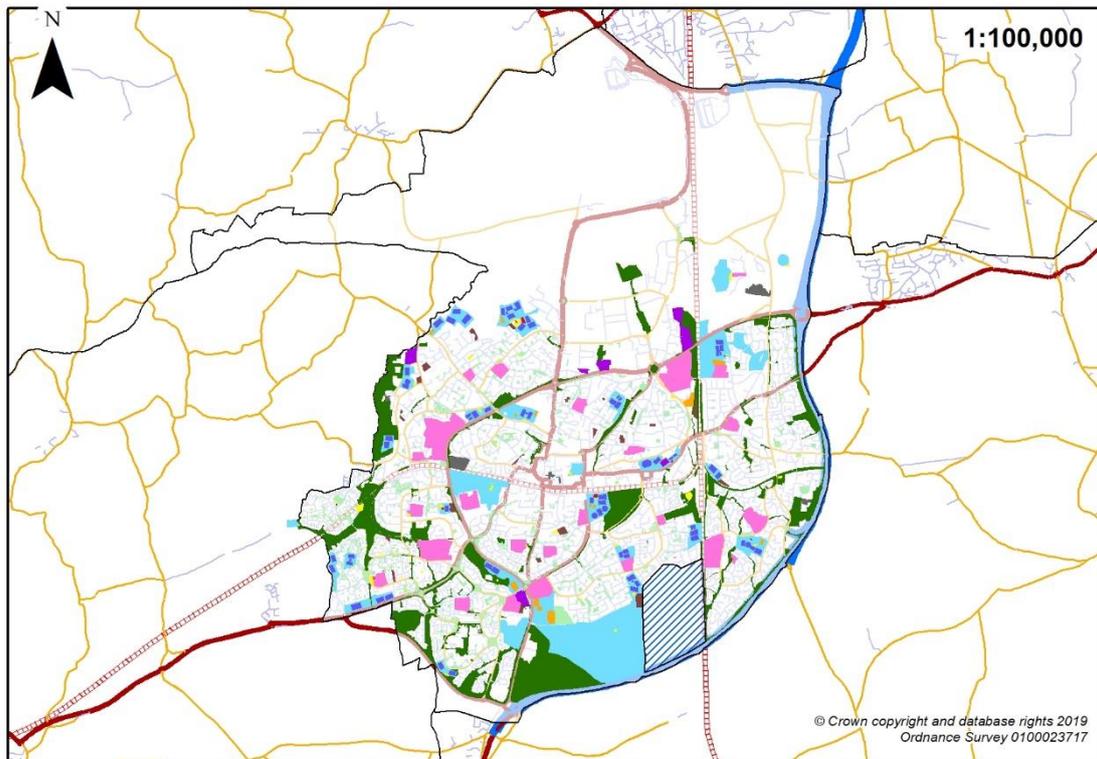
Whilst a site may be surplus to requirements as open space it may still be of environmental or cultural value; or the site's development may have unacceptable visual or amenity impact, or adversely affect its wider green infrastructure functions, including for climate change mitigation. Therefore, applicants should also carefully consider the character and other environmental policies in the Plan.

#### Reasoned Justification

- 7.9 *Determining what open space, sport and recreation provision is required as well as the qualitative and quantitative deficits or surpluses is a requirement set out in the NPPF.*
- 7.10 *The council's Open Space, Sport and Recreation Study has identified the location, quantity and quality of open space, sport and recreation provision. This assessment identifies the specific needs and quantitative or qualitative deficits or surpluses or open space, sports and recreational facilities in the local area. This can be used to determine the impact of proposals on open space.*
- 7.11 *The study has identified that overall Crawley is provided for relatively well with open space areas. However, distribution can be uneven which means that in some locations residents have further to travel to enjoy particular types of open space. The study, therefore, highlights the areas of deficiency in quantity, access and quality and also where opportunities for enhancement exist. The standards in this study determine a minimum level of quality and quantity of green space provision and the maximum distance people should have to travel to access different types of green space.*
- 7.12 *For the purposes of this policy, open space, sport and recreation facilities broadly fall into the following typologies:*
- *Indoor sports facilities*
  - *Parks and gardens*
  - *Natural and semi-natural open spaces*

<sup>34</sup> National Planning Policy Framework, Para. 96 (2019) MHCLG

- Amenity green space
- Provision for children
- Provision for young people
- Outdoor sports facilities
- Allotments
- Cemeteries and churchyards
- Civic spaces
- Green corridors.



	Allotments		Parks and Recreation Grounds
	Amenity Green Space		Outdoor Sports Space (Pitches)
	Churchyards & Cemeteries		Outdoor Sports Space (Fixed)
	Education		Outdoor Sports Space (Limited Access)
	Golf Course		Play Space (Children)
	Natural Green Space		Play Space (Youth)

#### Policy OS1: Open Space, Sport and Recreation Consultation Questions:

- Should allotments be provided evenly across the borough?
  - Would allotments be an open space facility which could be provided as a borough-wide offer?
  - Would you be more likely to want to travel to a better quality facility?
  - Would you only be willing to travel if there was no facility close to you?
  - Would you not be willing to travel for allotments at all even if there was no facility available or existing close to you?
- Should neighbourhoods with significant provision of amenity green space consider alternative uses for this open space?
  - Is it valuable in its own right, for other reasons than recreation needs?
  - What sort of uses could be considered acceptable, subject to amenity and other impacts being mitigated?
  - What uses should not be considered for amenity green spaces?
  - What is the role Structural Landscaping in providing amenity green space, and vice versa?

- Does Crawley have the right play spaces and youth facilities for the right ages? What should be provided? What are the impacts which should be considered when providing new play facilities?
- Should town centre residential and apartment developments and smaller house units (i.e. bedsits and 1 bed apartments) provide for children's and youth play space? Why or why not?
- Are there any other open space sites in Crawley which are of particular importance and should be considered to be protected as a Local Green Space?

## **Provision of Open Space and Recreational Facilities with New Development**

7.13 As Crawley grows, the population will increase putting pressure on existing open space and creating a demand for new open space and recreational facilities. It is important that as the town grows, so does the green infrastructure to support it.

### **Strategic Policy OS2: Provision of Open Space and Recreational Facilities**

The impact of the increased population from residential development on open space and recreational facilities serving a borough-wide population will be mitigated by the use of the Community Infrastructure Levy.

Where development is on existing open space which is not identified as surplus and is therefore required to be replaced through Policy OS1, a S106 agreement will also be sought to secure the replacement open space.

Depending on the characteristics and location of housing sites, on-site provision of open space may also be appropriate and required as an integral part of the development. Where the council agrees that such provision cannot reasonably be provided on site, the council will seek a financial contribution towards the enhancement of existing facilities in order to mitigate the increased demand. Details regarding the council's approach to seeking these contributions are provided in the Green Infrastructure SPD.

There is a significant supply of semi-natural green space across the borough. Opportunities are encouraged to provide multi-use open space provision in these areas, e.g. natural play areas, BMX tracks and signed routeways where there is an existing undersupply of these facilities and the impact on biodiversity is acceptable.

### **Reasoned Justification**

7.14 *In meeting the housing needs of the borough it is important to provide the infrastructure needed to support the increase in population and mitigate the impacts on existing facilities. This may be new provision on-site for larger developments or new provision or enhancements off-site to ensure that the overall supply, accessibility and quality of Crawley's open space does not diminish as the town grows. The general principle underlying the policy is that all new housing should mitigate its impact on Crawley's open spaces, sports and recreation facilities.*

### **Policy OS2: Provision of Open Space and Recreational Facilities Consultation Questions:**

- Is this policy sufficiently clear in its purpose?
- Is there anything which should be included in this policy?
- Do the proposed amendments clarify the difference between on-site requirements/off-site contributions and where CIL contributions will be used?

## **Rights of Way and Access to the Countryside**

7.15 In order to ensure that public access to the countryside and the urban network of rights of way is maintained and enhanced, the borough council as a local planning

authority will protect public rights of way including footpaths, bridleways, byways and unclassified country roads.

### Strategic Policy OS3: Rights of Way and Access to the Countryside

Unless it can be clearly shown that a Public Right of Way is unnecessary or not needed, proposals which result in the loss of a public right of way must ensure re-provision of equal or better value.

Proposals which detract from the character of a right of way or other type of recreational route must adequately mitigate the impacts or provide a new resource of equal or better value if this is not possible.

This may include:

- i) the provision of safe and convenient links to nearby rights of way/recreational routes; and/or
- ii) new or upgraded existing rights of way to multi-functional routes to create benefits for a range of users.

#### **Reasoned Justification**

7.16 *The NPPF requires local planning authorities to protect and enhance public rights of way and seek opportunities to provide better facilities for users.*

7.17 *The footpath, cycle and bridleway links within and between neighbourhoods and from the town into the wider countryside form an important recreational role for the borough's residents and visitors. The importance of access to the countryside and the need to improve it is emphasised in the West Sussex Rights of Way Improvement Plan and accompanying Project List. Although predominantly used for leisure activities, the public rights of way network can also provide valuable intra-urban movements and schemes should also take full account of any existing public rights of way within the borough.*

#### **Policy OS3: Rights of Way and Access to the Countryside Consultation Questions:**

- Is this policy sufficiently clear?
- Are the requirements of this policy justified?
- Is there anything additional this policy should cover?

## Infrastructure Provision

- 8.1 The retention of existing essential infrastructure and the provision of additional facilities and services to support new development is a key objective of the planning system. It is important to retain, and where possible enhance, existing essential infrastructure in the borough taking into account new innovations and the need to respond to climate change.
- 8.2 A complete picture of the provision of infrastructure in Crawley is contained in the draft Infrastructure Plan which supports the Local Plan Review.
- 8.3 As significant parts of the town's infrastructure are not actually provided by the borough council, it is important that the council continues to work closely with West Sussex County Council and utility and service providers (such as water providers, communication companies etc.) to ensure that the necessary infrastructure is in place for the lifetime of the Plan.

### Chapter Content

- 8.4 This chapter sets out the Local Plan policies and approach to ensure sufficient infrastructure to meet the needs of the existing and future population. It covers all types of general and social infrastructure provision. Green infrastructure and transport infrastructure are further covered in more detail in separate chapters later in this Local Plan.

### The Key Issues

- 8.5 Crawley's population is still growing: two new neighbourhoods are currently being added to the town; a significant number of new dwellings are coming forward within the town centre; and additional housing sites are proposed in the adopted Local Plan, and which are being continued to be allocated as part of this Local Plan Review. Growth in employment numbers and at Gatwick Airport is also anticipated. Therefore, it is important to ensure that the key transport, utility, service and community infrastructure facilities are improved and if necessary expanded to meet the needs of the town. Some facilities can grow incrementally as additional funding is provided through taxes, rates and investment plans, but other infrastructure facilities will soon reach a critical point beyond which a major new facility is likely to be needed, including the cemetery and possibly the sewage treatment works. Given the constrained nature of the borough, some new infrastructure facilities which require larger sites may have to be provided outside the borough boundary.

#### Infrastructure Provision Chapter Consultation Questions:

- Are there any transport, utility, or community facilities missing or needing improvement in your neighbourhood/in Crawley?
- What should be the key infrastructure priorities for supporting the growth which is planned in Crawley for the period 2020-2035?

### Local Plan Policies

#### Infrastructure Provision

- 8.6 People that live and work in the town need to be supported by a wide range of infrastructure facilities and services to enable the town to function and to provide a

high quality of life. This can be achieved by protecting existing infrastructure and ensuring that development can make provision for any additional infrastructure it requires.

### **Strategic Policy IN1: Infrastructure Provision**

Development will be permitted where it is supported by the necessary infrastructure both on and off site and if mitigation can be provided to avoid any significant cumulative effects on the existing infrastructure services.

Existing infrastructure services and facilities will be protected where they contribute to the neighbourhood or town overall, unless an equivalent replacement or improvement to services is provided or there is sufficient alternative provision in the area.

The council will charge Community Infrastructure Levy (CIL) on development taking place within the borough in accordance with the council's adopted CIL charging schedule.

Where appropriate and in line with the CIL Regulations, Section 106 agreements will address site specific issues.

#### **Reasoned Justification**

- 8.7 *Infrastructure covers a wide range of services and facilities such as transport, affordable housing, education, health, social infrastructure, community facilities, cultural facilities, sport centres, open space, parks and play space, waste management and disposal, libraries, cemeteries, emergency services, places of worship, utility services, waste water treatment, telecommunications infrastructure and flood defences.*
- 8.8 *It is important that the necessary infrastructure and community services are made available for the whole community, for everyone to enjoy a high quality of life. The NPPF highlights the role that infrastructure can play in contributing to sustainable development and the role Local Plans can play to ensure that the appropriate infrastructure is delivered. The Infrastructure Plan sets out in more detail an assessment of infrastructure provision in Crawley. These facilities which make a contribution to the provision of infrastructure provision in the town will be protected unless alternative provisions are made.*
- 8.9 *It is a fact that development will place additional demands on infrastructure provision and that developers will be expected to contribute to meeting the need for additional infrastructure generated by their development and ensuring cumulative effects are effectively mitigated. Development will be permitted where overall capacity limits, advised by infrastructure providers, are not breached. The borough council will charge developers the Community Infrastructure Levy (CIL) on appropriate development, in accordance with the council's adopted CIL Charging Schedule and the CIL Regulations (2010) as amended. Section 106 agreements will address relevant site specific issues to mitigate impacts on infrastructure that are not covered by CIL. The council's adopted Supplementary Planning Documents provide additional guidance on the use of S106 agreements following the introduction of CIL.*

#### **Policy IN1: Infrastructure Provision Consultation Questions:**

- Is the approach taken by this policy in respect of the infrastructure demands arising from development, and direct impacts of development on infrastructure, appropriate and justified?
- Does this policy need to define more clearly what is meant by 'infrastructure', or is the definition provided in the Glossary sufficient?

- Should this policy make specific provision in relation to particular types of infrastructure which are not adequately covered in other policies?
- Is the approach to developer contributions (CIL and S106) detailed in the policy consistent with the CIL Regulations?
- Are there ways in which the policy can/should provide further clarification regarding the relationship between different types of developer contributions?

### **New Infrastructure Provision**

8.10 The Infrastructure Plan provides an assessment of infrastructure in Crawley and whether new or additional facilities will need to be provided to support the town and its growth.

#### **Policy IN2: The Location and Provision of New Infrastructure**

The council will support the provision of new or improved Infrastructure in appropriate locations where the facilities are required to support development or where they add to the range and quality of facilities in the town.

Major facilities providing services on site which are accessed by the whole town or wider area should be located in the most sustainable locations accessible by a variety of means of transport.

Local community facilities should be located close to neighbourhood centres.

#### **Reasoned Justification**

- 8.11 *The NPPF highlights the need to plan for the provision of infrastructure to support residents and businesses. As has been identified earlier infrastructure covers a wide range of services and facilities. Where new facilities and services are provided, consideration needs to be given to their location depending on the number of trips generated and the use of the facility. The proposals will also need to be assessed against general development management policies.*
- 8.12 *Infrastructure facilities which generate a significant number of trips should be located in the most sustainable location where they can benefit from good public transport access and other suitable forms of transport.*
- 8.13 *Infrastructure which serves a neighbourhood catchment should be located close to neighbourhood centres. This will help maximise the accessibility of the site by foot and cycle as well as by public transport.*
- 8.14 *Other forms of infrastructure facilities which provide services but do not generate significant number of trips should be located in the most appropriate location, taking into account their impact on adjoining uses.*

#### **Policy IN2: The Location and Provision of New Infrastructure Consultation Questions:**

- Is this policy justified and necessary?
- Does any of the wording in this policy require further clarification, either within the policy or elsewhere?
- Does this policy need to make more specific provision for particular infrastructure projects or types of infrastructure not adequately covered in other policies?

### **Telecommunications and Broadband Provision**

8.15 The government requires the planning system to support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)

and full fibre broadband connections, prioritising full fibre connections to existing and new developments. Access to high quality infrastructure, and providing access to services from a range of providers, is important both in supporting economic growth and enhancing the provision to local communities.

- 8.16 West Sussex councils, including Crawley, are building a full fibre network that will connect key public sector sites, capable of delivering speeds from 1,000 megabits per second (1 gigabit) to meet the future need of public services. The project will not deliver fibre broadband to homes and businesses, but there is a commitment to providing full fibre within the county by working with the market to benefit homes and businesses in the future.

### Strategic Policy IN3: Supporting High Quality Communications

All residential, employment and commercial development of one unit or more must be designed to be connected to high quality communications infrastructure to ensure that full fibre or other cabling does not need to be retrofitted.

#### **Reasoned Justification**

- 8.17 *Through its Industrial Strategy, the Government has expressly focused on building a 'full fibre future for Britain' to deliver a digital infrastructure capable of providing today what the next generation will need tomorrow.*
- 8.18 *Crawley is part of the Greater Brighton Economic Region, one of the fastest growing city regions in the UK with a strong knowledge-based economy. A consistent message from businesses is that under-investment in infrastructure blocks growth and deters inward investment. Without the required level of investment, the full growth potential in the area will not be achieved. Exclusion from access to broadband can also reduce access to public services and employment opportunities, cause social isolation and mean that people may not be able to benefit from discounts for online billing or payments.*
- 8.19 *Despite the demand and potential economic benefits of full fibre deployment, the area lacks the fibre density in access networks and backhaul to ensure that local businesses have access to the infrastructure they need to innovate, differentiate and add value, so increasing the pace of economic growth. Increased speed and capacity from 5G will rely on higher frequencies and network densification. Without more high capacity fibre, carriers will be unable to support the projected minimum four-fold increase in mobile data traffic.*
- 8.20 *The countywide West Sussex Gigabit project, (a collaboration with all West Sussex local authorities and Department for Digital, Culture, Media and Sport), aims to deliver gigabit capable connectivity to the public sector. All the local authorities in West Sussex have agreed to work together to secure full fibre infrastructure. There is also potential to attract further commercial investment in full fibre, and this would support the expansion of key urban clusters across the county into gigabit towns and cities.*
- 8.21 *Retrofitting full fibre broadband into existing development is a costly and disruptive process, therefore measures to incorporate the fibre optic cables directly into development, as part of the construction process, should be encouraged.*

#### **Policy IN3: Supporting High Quality Communications Consultation Questions:**

→ Is this policy justified and necessary?

- Should this policy include further detail regarding the specification and standards of cabling to be installed?
- Is further clarification required regarding the scope of development types affected by this policy?
- Is the policy appropriately worded to ensure that new developments of one unit or more are delivered to be 'full fibre' ready?
- How else can the Local Plan support high quality communications?

## Economic Growth & Social Mobility

### **Improving Job Opportunities and Developing the Local Economy: Economic Growth & Social Mobility**

*As a progressive town, Crawley will strive to be distinctive from other towns in West Sussex. It will be the premier town between London and the South Coast providing jobs, learning and development opportunities and a leisure and cultural offer that draws visitors from across the South East.*

*Crawley will continue to be an economic leader meeting the needs of significant employers who are important to the overall prosperity of the region. A business environment that supports and encourages new and established businesses to grow and flourish will be developed, and supporting necessary infrastructure, including telecommunications, will be enhanced.*

*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.*

*Redeveloping and revitalising the Town Centre and further regeneration of the Manor Royal Business District will make Crawley the place to do business in the South East. Sustainable growth of Gatwick Airport will continue to support the economic growth of the town.*

*The revitalised Town Centre will be the heart of the town, providing a central point for local people and others from across the region to enjoy social activities, shopping, culture and entertainment both during the day and at night. It will have a welcoming and attractive family friendly environment. The Town Centre will become a recognised neighbourhood with local facilities supporting its residents.*



## Economic Growth

- 9.1 Crawley is firmly established as one of the key economic drivers in the South East of England. The borough is situated at the heart of the Gatwick Diamond and is a central economic focus for the Coast to Capital Local Enterprise Partnership. It is home to a major international airport. Manor Royal, within the borough, is one of the region's premier business destinations, employing over 30,000 people across an area of 240 hectares. Development of key mixed use sites within the town centre is revitalising the town centre, whilst through its excellent transport links, Crawley continues to be well connected internally, nationally and internationally.
- 9.2 To promote the continued prosperity of the Gatwick Diamond and plan for its future growth, a Gatwick Diamond Local Strategic Statement has been prepared on a joint basis and endorsed by the two county councils and six local authorities covered by the area. The Statement sets out a commitment among local authorities to work together to promote the economic function of the Gatwick Diamond, recognising the strength of Crawley/Gatwick as a business location.
- 9.3 The NPPF is clear that local authorities should work to proactively promote growth through establishing and delivering upon a strong economic vision. The economic policies set out in this Local Plan respond to the objectives of the NPPF and Gatwick Diamond Local Strategic Statement, and, drawing upon evidence, including the Economic Growth Assessment (2019) and the emerging Retail, Commercial Leisure, and Town Centre Neighbourhood Needs Assessment, seek to build on the foundations of Crawley's strengths. Through working closely alongside the Gatwick Diamond local authorities, businesses, developers and other stakeholders, the policy approaches set out in this chapter plan positively to promote the economic growth of Crawley and the wider Gatwick Diamond.

### Chapter Content

- 9.4 This chapter sets out strategic and spatial policies that respond to identified economic growth requirements for Crawley over the Plan period, identifying the amount of economic growth needed over the Plan period to 2035, and detailing the role of Crawley's economic areas to make clear how sustainable economic growth will be promoted and accommodated. The chapter establishes planning approaches for Manor Royal and the other Main Employment Areas within the town and, having regard to their individual form and character, sets out policies to guide economic development over the Plan period. Specific policies relating to Gatwick Airport and the Town Centre are covered in the two subsequent chapters. Through this approach, the Local Plan will plan positively for sustainable economic growth, promoting and enhancing the economic role of the town, and guiding its role within the Gatwick Diamond.

### The Key Issues

- 9.5 The Local Plan supports the delivery of sustainable economic growth, establishing a clear policy framework to facilitate development to help to meet quantitative and qualitative demand for all types of economic activity over the Plan period to 2035.
- 9.6 To inform the Local Plan the council has revised the Economic Growth Assessment (EGA, 2019) for the Northern West Sussex Functional Economic Market Area, working with Horsham District Council and Mid Sussex District Council under the Duty to Cooperate. The EGA takes account of the travel to work area and inter-

related housing market area to provide a detailed analysis of Crawley's forecast job growth, and corresponding business-led economic land supply and floorspace needs over the next 15 years.

- 9.7 The EGA has informed the policy context in this chapter and provides the robust evidence base in regard to sectors or locations when employment uses are to be promoted or protected in a Crawley-specific context. The EGA has identified significant demand for business-led economic growth, specifically within the B Use Classes. Recognising its key role at the heart of the Gatwick Diamond, the EGA outlines that Manor Royal should continue to represent the primary focus for B Class employment uses, with other employment areas in the borough accommodating wider economic growth demands.

#### **Economic Growth Chapter Consultation Questions:**

- Given the limited amount of land remaining in Crawley, how best can new employment floorspace be developed in the borough?
- Do you feel all our Employment Areas should be protected from redevelopment, or which do you feel are the most important?
- Are there any types of employment floorspace missing in Crawley, or that we need more of?
- How do you think the employment skills gap should be addressed?
- Do you think the evening and night-time economy should be supported? If so, how?

### **Local Plan Policies**

#### **Economic Growth**

- 9.8 Crawley/Gatwick is the leading economic driver in the Gatwick Diamond, identified by Coast to Capital Local Enterprise Partnership as forming the economic heart of the Coast to Capital area, and recognised by the Gatwick Diamond Initiative as a main focus for future economic development. The 2015 Local Plan (CBLP) seeks to protect and enhance Crawley's role as this key economic driver. There is a strong demand from businesses wishing to locate in Crawley, though the scope to accommodate identified business needs is severely limited by the constrained land supply position in Crawley borough, which is significantly affected by the uncertain status relating to the requirement to safeguard land in the north of the borough for a possible additional runway at Gatwick Airport.
- 9.9 The 2015 CBLP plans positively for sustainable economic growth within the context of the borough's constrained land supply, protecting and intensifying the use of existing main employment areas, and supporting minor extensions to Manor Royal to facilitate business-led economic growth. Despite this, the constrained land supply means the Plan identified there is an unmet need for business land in Crawley of 35 hectares over the Plan period 2015-2030.
- 9.10 To accommodate Crawley's needs the CBLP 2015 identified an Area of Search in the north of the borough. However, this land was (and remains) largely constrained by safeguarding for the possible development of an additional runway at Gatwick Airport. The CBLP 2015 identified a risk that the limited land supply position could result in some business needs could be displaced, potentially outside the sub-region entirely. Therefore, the adopted Plan committed the council to working with neighbouring authorities to address its unmet need in the most appropriate manner and locations.
- 9.11 Through its Development Management Policies DPD (2019) Reigate & Banstead Borough Council has allocated land at Horley, immediately to the north of Crawley, to

accommodate a new business park. This will be a business-led development, helping to facilitate the retention and expansion of existing businesses, whilst also enabling inward investment to be secured within the Gatwick Diamond. Given its allocated location close to Crawley, it is recognised that the Horley Business Park will create employment opportunities for residents in Crawley and the wider Gatwick Diamond, and the allocation has significant scope to help to accommodate unmet business needs of Crawley, whilst securing inward investment to the Gatwick Diamond.

- 9.12 The emerging 2019 EGA is identifying a provisional business land need of between 44.6 and 57.6 hectares over the Plan period to 2035. This work is continuing to evolve, and these initial figures will need to be sensitivity tested. This work will also explore in greater detail the relationship of Horley Business Park in helping accommodate Crawley's unmet business land needs. Moving forward, continued joint working with the Gatwick Diamond local authorities will be undertaken to accommodate identified unmet business needs. This approach has been endorsed and agreed by the three partner authorities involved with the northern West Sussex EGA, and joint working with these and other neighbouring authorities will remain on-going.

### Strategic Policy EC1: Sustainable Economic Growth

Crawley's role as the key economic driver for the Gatwick Diamond will be protected and enhanced. The council will ensure that suitable opportunities within the borough are fully explored to enable existing and new businesses to grow and prosper.

To ensure that Crawley's recognised economic role and function is maintained and enhanced the council will:

- i) Build upon and protect the established role of Manor Royal as the key business location (B Use Classes<sup>35</sup>) for Crawley at the heart of the Gatwick Diamond;
- ii) Ensure that the borough's Main Employment Areas are protected to remain the focus for sustainable economic growth;
- iii) Encourage the redevelopment and intensification of under-utilised sites in Main Employment Areas; and
- iv) Support minor extensions to Manor Royal, where this would deliver additional B-class business land, and can be achieved in a manner that is consistent with other Local Plan policies.

Opportunities for approximately 13.19ha of employment land are identified within the borough, meeting short-term economic growth needs for the town over the early part of the Plan period. As a minimum, it is anticipated that between 44.6 and 57.63 hectares additional land for business uses is required in order to secure future economic growth at Crawley.

It is recognised that the majority of land required will necessitate the identification of new strategic employment location(s) within the Plan period. Any strategic employment location(s) will be of a scale and function that helps meet identified quantitative and qualitative needs for business development and will complement the established role of Manor Royal as a strong and competitive business district.

The hierarchy for delivering new strategic employment land, working with neighbouring authorities as required, will be to identify, in order of preference:

- a. Land within Crawley, in the north of the borough;
- b. Land at Crawley/Gatwick, in the areas immediately adjoining the borough;

<sup>35</sup> B1 (Business), B2 (General Industry), B8 (Storage or Distribution) as identified by the Town and Country Planning (Use Classes) Order 1987 (as amended)

c. Land near Crawley/Gatwick.

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 potential additional runway at Gatwick Airport, work required to identify an appropriate site, or sites, for further business development will only take place after the position regarding safeguarding has been determined and any new policy approach formally adopted.

**Reasoned Justification**

- 9.13 *Policy EC1 recognises the key sub-regional employment function which Crawley provides within the Gatwick Diamond. It encourages sustainable economic growth by supporting the retention of employment uses in the existing main employment areas. The emerging Economic Growth Assessment will play a key role in understanding qualitative and quantitative economic growth needs within Crawley and the Gatwick Diamond. The emerging work recognises that Crawley is well placed to adapt to the implications of Brexit, and the borough is forecast to continue operating as the leading location for new employment.*
- 9.14 *The EGA focuses on future job creation and land take requirements within the sectors of B1 business (office, research and development, light industry), B2 (general industrial) and B8 storage or distribution (wholesale warehouses, distribution centres). Other employment uses beyond B Classes vary more significantly in terms of range, employment density and operational requirements. As such, the EGA has not factored in job creation within the wider category of economic development into a formal land take. This, in part, is captured through other work including the Retail Capacity and Impact Study. Therefore, with Manor Royal identified as the focus for business-led development, non B-class economic development will be directed to other Main Employment Areas in Crawley, including the town centre.*
- 9.15 *The 2015 EGA update outlines that, for the adopted Plan period 2015-2030, 57.9 hectares would be required for B use class development. The emerging work of the updated 2019 EGA is suggesting a B-class business land requirement of between 44.6 and 57.63 hectares for Crawley over the forthcoming Plan period 2020-2035, though these initial figures will require refinement and testing as the study progresses.*
- 9.16 *Crawley's limited available land supply presents challenges in delivering the required level of business floorspace. For this reason, a supply-led approach was taken by the Local Plan 2015-2030 in planning for business-focused employment need<sup>36</sup>, based on an available land supply of 23ha. Since Local Plan adoption, the available business land supply has continued to reduce as sites are built out, and the January 2019 Employment Land Trajectory identifies a reduced employment land pipeline of 13.19ha. It is forecast this will meet business growth needs for the short term. However, the demand for land to accommodate business uses in the longer term is significantly higher than the amount of land which is or could be made available from within the existing employment areas. In recognition of this, and in light of Manor Royal's key role as a business location within Crawley and the Gatwick Diamond, Policy EC1 seeks to protect land and premises within Manor Royal for business uses. Wider employment growth outside of the B Use Classes is also directed to and encouraged within the other Main Employment Areas.*
- 9.17 *It is estimated that, even allowing for the intensification and retention of land and buildings for employment uses within the Main Employment Areas, there will remain*

<sup>36</sup> As required by Planning Practice Guidance (2014) the council has prepared an employment land trajectory, which is updated annually and published alongside the Authority's Monitoring Report.

*an outstanding need for at least a further 32.8 hectares of land just to meet the minimum baseline demand of 44.6 hectares of land for business class uses. It is anticipated that Horley Business Park will help to accommodate some of this unmet need, and the 2019 EGA will undertake sensitivity testing to explore this further.*

- 9.18 *However, it is anticipated that there will likely remain unmet business land need. To help address the under-supply of business land, Policy EC1 seeks to protect the function of Manor Royal as the key destination for B-class business development, and safeguards all designated Main Employment Areas to safeguard the economic function of Crawley and the wider Gatwick Diamond. To maximise the use of Crawley's limited employment land supply, Policy EC1 supports the redevelopment and intensification of under-utilised sites in Main Employment Areas to maximise their efficient use. In order to respond to this demand and to the potential for growth beyond this level, some minor extensions abutting the Manor Royal boundary may be appropriate on those sites that are currently outside safeguarding. Should proposals come forward for these areas, regard must be had to the countryside setting of the site, its surrounds and context, given its location within the Upper Mole Rural Fringe (Policy LC5). Should any extensions be considered appropriate, development will need to demonstrate how it delivers additional B Use Class floorspace in line with Policy EC9. Following implementation, the site would form part of the Manor Royal Main Employment Area, and Policies EC2 and EC9 will apply.*
- 9.19 *Further strategic employment development may be needed in the medium to long term, subject to sensitivity testing through the 2019 EGA to understand in full the extent to which the allocated Horley Business Park is capable of accommodating some of Crawley's unmet business land needs. It is recognised that the need for business land and the available supply of land developable for business-led economic growth will evolve during the Plan period. To maintain an up-to-date understanding of business land requirements and available land supply over the Plan period, the council will publish an annual update of its Employment Land Trajectory alongside the Authority's Monitoring Report.*
- 9.20 *In order to retain Crawley's role as the key economic driver in the sub-region, it is vital that the Local Plan fully explores opportunities to accommodate sustainable economic growth in Crawley, should the EGA confirm that such a requirement remains. Therefore, an Area of Search is initially identified on the Key Diagram. This area reflects evidence that the preferred location for any additional employment land, given the scale and quality required, would most likely be in the form of a Strategic Employment Location or Locations to the north of Manor Royal and south east of Gatwick Airport, particularly because this area is sustainably located adjacent to Manor Royal, Gatwick Airport and existing transport links. The location(s) would complement Manor Royal and build upon its existing scale and function, and represent a sustainable use of land. It is also recognised that housing is unlikely to be appropriate in this area as a result of aircraft noise. However, this area is currently constrained by safeguarding for a possible new runway at Gatwick, so Policy EC1 sets out a commitment to assess opportunities in this area should it be determined that safeguarding can be removed and the new policy approach is formally adopted (see GAT2).*
- 9.21 *If the current area of safeguarded land is retained and employment needs cannot be accommodated within Crawley, then the council will continue to work alongside the Gatwick Diamond Local Authorities and other stakeholders to investigate the scope and implications of additional employment land coming forward during the Plan period in the areas adjoining Crawley/Gatwick in a manner that supports and complements its role as the key economic focus for the wider sub-region. If needs cannot be met on land within Crawley, or at the periphery of Crawley/Gatwick, the council will work with the Gatwick Diamond local authorities to investigate the most*

*appropriate locations near Crawley/Gatwick to accommodate any outstanding employment needs near Crawley, complementing the role and function of the town within the sub-region.*

#### **Policy EC1: Sustainable Economic Growth Consultation Questions:**

→ How best can the Local Plan seek to accommodate Crawley's identified employment needs?

### **Main Employment Areas**

- 9.22 Crawley's economy is characterised by its range of employment areas, each of which has an established character and function, and performs an identified role. Given the scarcity of available employment land within the borough, the council's evidence base makes clear that sustainable economic growth should be focused within the existing Main Employment Areas. Policy EC2, therefore, seeks to protect and improve the existing economic areas, maximising the potential to utilise existing employment sites before other sites are considered.
- 9.23 Manor Royal, Gatwick Airport and Crawley Town Centre represent key economic locations, and are identified as Main Employment Areas. Given the fundamental role performed by each in driving the Crawley and Gatwick Diamond economy, individual location-specific policies for each are established through Local Plan Policies EC9, GAT1-4 and TC1-5 respectively. In addition to these spatial policies, Policy EC2 also applies to the designated Main Employment Areas of Manor Royal, Gatwick Airport and Crawley Town Centre.
- 9.24 Crawley's remaining Main Employment Areas identified within Policy EC2 are: Three Bridges Corridor (including Hazelwick Avenue), Maidenbower Business Park, Tilgate Forest Business Centre, Broadfield Business Park, Lowfield Heath, Broadfield Stadium and K2 Crawley, and The Hawth. The role and function of these Main Employment Areas for economic development use will be protected, and further intensification of employment uses within these sustainable locations will be supported.
- 9.25 The approach dovetails with the objectives of other policies and the wider Local Plan Vision which directs other employment generating uses to the most sustainable and appropriate locations. Given the need to balance use of the available land supply for economic and housing needs, the policy criteria of Policy EC2 will not apply where residential development is proposed at housing sites identified under Local Plan Policy H2, unless explicitly stated.

### **Strategic Policy EC2: Economic Growth in Main Employment Areas**

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.

The Main Employment Areas are:

- Manor Royal (see also Policy EC4, EC5, EC9)
- Crawley Town Centre (see also Policies EC4, EC5, TC1-TC5)
- Gatwick Airport (see also Policies GAT1-GAT4)
- Three Bridges Corridor (including Denvale Trade Park, Spindle Way, Stephenson Way and Hazelwick Avenue)
- Maidenbower Business Park
- Tilgate Forest Business Centre
- Broadfield Business Park

- Lowfield Heath
- Broadfield Stadium and K2 Crawley
- The Hawth.

Employment generating development will be supported in the Main Employment Areas where it makes for an efficient use of land or buildings and it 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. the site is no longer suitable, nor viable, nor appropriate for employment purposes, or that a small loss of employment floorspace will support the wider economic use of the site; and
- ii. the loss of any land or floorspace will result in a wider social, environmental or economic benefit to the town which clearly outweighs the loss; and
- iii. there is no adverse impact on the economic function of the Main Employment Area, nor the wider economic function of Crawley.

### **Reasoned Justification**

9.26 *The approach set out in this Policy supports the roles defined for all Main Employment Areas, including Manor Royal, Town Centre and Gatwick Airport. Other Main Employment Areas within the borough play a smaller but important complementary role, supporting a range of employment uses including small businesses, higher value offices, and high quality leisure facilities, as outlined below. The Policy ensures the role and function of each area is protected and strengthened to enhance economic growth and prevents their economic function being diluted and potentially compromised by inappropriate development. To further protect the employment function of the borough, Article 4 Directions are in place for several Main Employment Areas, and users are advised to liaise with the council prior to undertaking any works.*

### **Main Employment Areas with Location-Specific Local Plan Policies**

#### **Manor Royal: A premier location for business (Policies EC2, EC4, EC5 and EC9)**

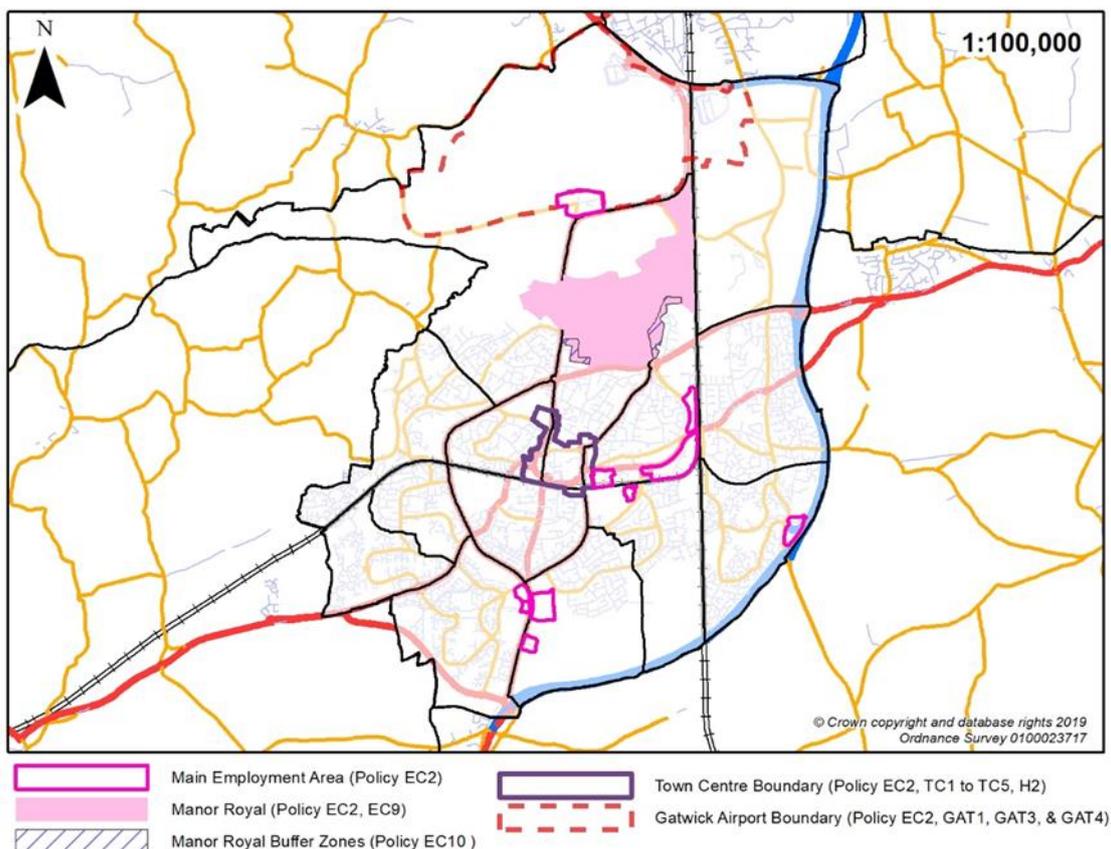
9.27 *Manor Royal is the Gatwick Diamond's leading business district, benefiting from sustainable transport links providing excellent access to London, Brighton and Gatwick Airport. It is a key location for business and the Local Plan responds to identified business floorspace need and feedback from business groups in identifying Manor Royal as the preferred location for B Use Classes in order to sustain its established economic role in the wider sub region. The detailed policy approach for Manor Royal is set out in Policies EC4, EC5 and EC9.*

#### **Crawley Town Centre: A sub-regional shopping and leisure destination (Policies EC2, EC4, EC5 and TC1-TC5)**

9.28 *Crawley Town Centre is the main shopping area in the borough, and is a key shopping destination for people living in the wider sub-region. It contains a good range of shops, restaurants, cafes and bars, as well as entertainment uses at Crawley Leisure Park, all of which contribute to the overall attractiveness of the town centre as an enjoyable place to visit. As a centrally located and highly sustainable location, the town centre is regionally significant, and is the most sequentially preferable location for any retail and leisure developments. The detailed policy approach for the Town Centre is covered in detail under Policies EC2, EC4, EC5 and TC1-TC5.*

**Gatwick Airport: An international airport (Policies EC2 and GAT1-4)**

9.29 Gatwick Airport currently serves 45.7 million passengers per annum (mppa), and is forecast to grow by approximately 15 mppa by 2032, within the current two terminal, single runway operation. As a hub for employees and visitors, and a key economic driver through direct or indirect employment, the airport is central to the function of the wider economic area. The airport provides a significant number of jobs, but, due to its unique strategic role, the policies for Gatwick and employment uses at the airport are established in a separate chapter in this Local Plan, dealing with the main planning policy matters for the Airport. The approach is set out in further detail under Policies GAT1 to GAT4.



**Other Main Employment Areas**

**Three Bridges Employment Corridor: A local small business location**

9.30 The Three Bridges Employment Corridor is situated in a highly sustainable location between Three Bridges railway station and Crawley Town Centre. It offers a selection of older and smaller units at a location close to the town centre, and includes Denvale Trade Park, Spindle Way, Stephenson Way and Hazelwick Avenue. It supports a diverse range of economic uses including light storage, distribution, trade, car showroom and automotive uses. Residential uses surround and split the Main Employment Area.

**Maidenbower Business Park, Tilgate Forest Business Centre and Broadfield Business Park: High value business locations**

9.31 These small scale business parks provide edge of the urban area commercial floorspace in a green setting, complementing the business roles of Manor Royal and the town centre. These locations are situated adjacent to main road interchanges, and support a mix of employment uses.

### Lowfield Heath: Mixed-use employment location

9.32 As a more traditional estate, accommodating a wide range of light industrial and some non-B Class uses, the area is located adjacent to the southern perimeter of Gatwick Airport. There is a range of building stock, with regard to size and use, and the site forms a good secondary role close to Manor Royal. This main employment area is situated within Gatwick Airport safeguarded land, and applicants should also refer to Local Plan Policy GAT2.

### Broadfield Stadium and K2 Crawley

9.33 Recognising the contribution that these out of centre leisure locations provide to the vibrancy and offer of the local economy, the council aims to support their continued presence within the borough. Their continued evolution will be supported where their growth does not conflict with the wider objectives for the town centre and Manor Royal.

#### **Policy EC2: Economic Growth in Main Employment Areas Consultation Questions:**

- Does the Policy plan positively for sustainable economic growth in Crawley?
- Given Crawley's constrained employment land supply, the policy requires economic development to make for an efficient use of land and/or buildings. Do you have any views on this approach?
- Does the Policy designate the correct Main Employment Areas; should any of the designated boundaries change?

### **Office Provision**

9.34 The emerging 2019 EGA identifies office-based employment as a key growth sector over the Plan period to 2035, showing a greater office need than previously identified, though the amount of need is still commensurate with that industrial typologies. The market demand is particularly for Grade A specification office stock, often bespoke rather than speculative, and across a range of sizes. This demand is in contrast to the available supply, which is largely composed of Grade B stock. This has resulted in the Crawley office market being somewhat suppressed, with the limited available Grade A stock quickly taken up, and lower grade stock tending to remain vacant or become vulnerable to other economic uses. Loss of office floorspace through permitted development has also been an issue, with 61,500 square metres of commercial space lost to residential development through prior approval.

#### **Strategic Policy EC3: Office Provision**

The office sector (use classes B1a and B1b) is a key growth area in Crawley, with identified need for a minimum of 169,020sqm office floorspace (25 hectares land) identified for the Plan period to 2035.

Within the main employment areas, development within Use Classes B1a and B1b will be supported where this adds to the overall stock of Grade A offices, and makes for an efficient use of land.

Where office development is proposed within the designated Main Employment Areas, it will not be necessary to undertake a sequential assessment as part of planning applications.

### **Reasoned Justification**

9.35 The emerging 2019 EGA anticipates growth of 2,800 new jobs over the Plan period to 2035, equating to use class B1a/b floorspace requirement of 169,020 sqm. Of the

identified business land requirement of between 44.6 and 57.6 hectares, around 25 hectares would be needed to accommodate the forecast demand for office growth.

- 9.36 *With the 2019 EGA evidence base continuing to be sensitivity tested, it is not clear yet whether there is a case for prioritising offices over industrial uses, though provisional findings would suggest that specific demand for Grade A offices is not being met, and it is recognised that office use generally makes for a more efficient use of land than industrial business uses, so may support the Local Plan approach to maximise the use of existing land in light of the recognised constrained business land supply. This latter point is addressed to some degree through the making of Article 4 Directions at identified main employment areas, and through the efficient use of land through the Policy CD4 (Effective Use of Land), though it is possible that a specific office focused policy could more positively support office uses.*
- 9.37 *Proposals for new B Use Class floorspace within Main Employment Areas is encouraged, and B1 proposals will be exempt from the requirements of the sequential test. Offices play a critical role in supporting the economy, and in generating business-led economic growth that makes for an efficient use of land.*

#### **Policy EC3: Office Provision Consultation Questions:**

- Is there a justification for incorporating a policy relating to office provision within the borough, based on the emerging evidence of the Economic Growth Assessment, and any other information you can provide?
- Should the policy be written to protect offices, promote offices, or prioritise offices over other types of employment uses and/or other non-employment uses?
- Is there any benefit in providing a policy directing the geographical focus or development criteria for offices?

#### **Visitor Accommodation**

- 9.38 Based on a number of recent pre-application enquiries, there appears to be market demand for additional hotel and visitor accommodation in Crawley. Much of this interest has focused on Manor Royal, specifically related to business use, rather than tourist uses associated with Gatwick Airport. Evidence has been provided to demonstrate how hotel use, subject to scale and supporting facilities, can perform a complementary function.
- 9.39 However, given the constrained business land supply, it is questionable whether non B-use class development, of the scale of a hotel, is appropriate in Manor Royal. In other main employment areas, recognising hotel use as an economic development, it is possible to consider greater flexibility for such uses, and hotel accommodation may be more appropriate in these locations, particularly in the Town Centre. The emerging evidence from the 2019 EGA and the Retail, Commercial Leisure and Town Centre Neighbourhood Needs Assessment should provide evidence and a policy steer as to what the capacity for hotel accommodation is in Crawley and where this can most appropriately be located. It is anticipated this will consider the quantum of hotel accommodation at which provision could become harmful to the employment function of Manor Royal or other Main Employment Areas.

#### **Strategic Policy EC4: Visitor Accommodation**

Hotel and visitor accommodation will be supported in the Town Centre.

In Manor Royal Main Employment Area hotel and visitor accommodation will only be permitted where it is demonstrated that the development will cater specifically for the

business needs of Manor Royal, and not visitor needs associated with travel to and from Gatwick Airport. In doing so, planning applications should demonstrate that the requirements of Local Plan Policy EC9 (Manor Royal) are satisfied.

In all other main employment areas, hotel and visitor accommodation will be supported, subject to the sequential and impact tests set out in Policy TC5.

Where hotel and visitor accommodation is located outside of the Gatwick Airport Boundary (in off-airport locations), parking provision shall be kept solely for the use of staff and guests of the development and shall not be block parked or used by for any other purpose, including as off airport car-parking.

### **Reasoned Justification**

- 9.40 *Whilst the demand for visitor accommodation has been focused on the provision within Manor Royal, too much provision of non-B Use Class development will undermine the functions of the Main Employment Area and be contrary to Policies EC1 and EC2 above, and Policy EC9 below.*
- 9.41 *As a main town centre use, for locations outside the town centre, applications for new visitor accommodation should be subject to the sequential and impact tests as set out in Policy TC5.*
- 9.42 *Local Plan Policy GAT3 “Provision of additional or replacement airport-related parking” will only be permitted within the airport boundary and must be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport. This includes parking at hotels, and Policy EC4 contains the appropriate text to ensure consistency with this approach.*

### **Policy EC4: Visitor Accommodation Consultation Questions:**

- Whilst the demand for visitor accommodation has been attracted to Manor Royal, too much of non-B Class uses in this Main Employment Area may undermine its function. Do you agree with this concern? Please explain.
- Are there other locations where good quality visitor accommodation could be better provided? What would need to be in place to ensure this meets the needs of the demands arising from the business community?
- The application of the sequential and impact tests would potentially protect the Main Employment Areas, outside the town centre, as visitor accommodation is a main town centre use. Is this sufficient to use without a further policy specifically for visitor accommodation, or can this policy be used to plan more positively for meeting visitor accommodation needs?

### **Night-Time Economy**

- 9.43 The evening/night-time economy can offer opportunities in terms of economic benefits and increased vibrancy and activity in areas otherwise unused and empty outside of day-time hours. However, in the wrong location or where poorly managed they can create negative impacts including nuisance, noise and fear of crime. In Crawley, the night-time economy is directed towards specific locations where these activities are more likely to be expected and where nuisances can be better controlled and managed, e.g. Town Centre in particular, the parades and possibly Manor Royal.
- 9.44 Policy EC5 would actively support the night-time economy, recognising its role in generating activity, and in supporting the parts of the town that have an 24-hour function. To an extent, promotion of the evening and night-time economy is captured in other policies, with Policy TC4 supporting the evening and night-time economy, particularly in the secondary shopping frontages, and where it can be demonstrated

that development would add value to the town centre vitality and viability. This is the same for the parades, subject to scale and amenity impact where evening operating uses such as cafes and take away uses provide an important offer. For Manor Royal, Policy EC9 would not rule these uses out, and could allow them to come forward subject to scale and where they support (and do not undermine) the business function of the main employment area. Policies particularly in relation to general development requirements (Policy CD5); Noise (EP4); and Parking (ST2) will be relevant to manage nuisance.

### Strategic Policy EC5: Night-Time Economy

Development that adds to the vibrancy of vitality of the evening and night-time economy in Crawley Town Centre will be supported, subject to ensuring that it is acceptable in amenity terms, having regard to the NPPF 'agent of change' principle.

The neighbourhood parades are located in residential areas, where evening and night-time economy uses will need to be carefully managed. Development proposals for such uses will be required to meet the policy requirements of EC11 (Neighbourhood Centres).

Manor Royal is a 24-hour main employment area. Small scale evening and night-time economy uses will be supported, provided it can be demonstrated that these would serve the employees of the main employment area, and subject to satisfying the requirements of Policy EC9.

#### Reasoned Justification

9.45 *The NPPF requires Local Plans to take a positive approach in planning for competitive Town Centres, including through steps that support the evening and night-time economy. It is also recognised that with Gatwick Airport and Manor Royal in the borough, there is a 24-hour nature to the town, with many residents employed in shift work. The Local Plans of other Local Planning Authorities often include policies that support the night-time economy, whilst also considering issues of amenity, noise and disturbance. The draft Crawley Borough Local Plan seeks to support the night-time economy subject to amenity issues for existing uses, and new residential uses should mitigate where existing night-time uses are in place – this also extends to where the residential development is being located in an area (such as the town centre or immediately adjacent to the Parades) which this policy has identified as being an acceptable location, in principle, for night-time and evening development and uses.*

#### Policy EC5: Night-Time Economy Consultation Questions:

- Is the night-time economy already covered by the other policies in the Plan? Is there any benefit to having a bespoke policy in order to support this type of provision; direct it to specific geographic locations and away from others; and/or to manage nuisance?
- Should this policy be solely related to opportunities within the town centre? Is there potential for night-time and evening economy development/uses in other areas within the borough, particularly if these are within the residential neighbourhoods or outside of the other main employment areas?

#### Employment and Skills Development

9.46 Crawley is well established as a key employment destination in the Gatwick Diamond, and is home to over 3,400 active businesses which generate 95,000 jobs. Despite its strong economic performance, there is a recognised disparity in the generally lower skill levels and income achieved by people that live in Crawley and those of the in-commuting workforce, which are on average higher. This is reflected

in Crawley's position close to the bottom of social mobility rankings published in the State of Nation report, where Crawley ranks 304<sup>th</sup> out of 324 local authorities.

- 9.47 Addressing the skills gap is vital to enabling local people to access higher skilled employment, creating the right conditions for career opportunities within the borough. It is also important that Crawley offers the right skills' profile to cater for the needs of current and future employers. Through the council's own research, it is estimated that £49 million GVA per annum is lost through skills' shortages, and working to address the skills' gap will help ensure that Crawley continues to attract inward investment as a preferred location for business.
- 9.48 The Crawley Employment and Skills' Plan, launched in 2016, has made a significant impact. Its flagship projects, which include the borough having achieved Construction Industry Training Board (CITB) Skills Academy status, introducing the Developer and Partner Charter and the creation of the council's flagship project, Employ Crawley, have helped address skills gaps in the local workforce to benefit local people and businesses. Through creating different routes to education and higher value jobs, it has helped to empower some of the most disadvantaged residents and has promoted and enhanced the council's commitment to making Crawley a Living Wage zone. Through the updated Crawley Employment and Skills Programme 2019-2024 and joint working with stakeholders, the council is continuing its work to enable Crawley residents to access better quality job opportunities within the town.
- 9.49 However, more needs to be done. Crawley continues to have a lower proportion of residents with higher level skills (NVQ4+) and lags behind neighbouring districts and the South East England average in terms of its average weekly earnings (resident based) and average GVA per worker. As such, it is vital that the Local Plan supports the council's social mobility agenda.

### Strategic Policy EC6: Employment and Skills Development

Major residential and non-residential developments will be required to contribute to meeting the objectives of the most up to date Crawley Employment and Skills Programme.

An Employment and Skills Plan and Method Statement will be required to be submitted with all major planning applications, to be agreed with the council. This will detail how the developer will support initiatives identified in the Crawley Employment and Skills Plan, with costs to be borne by the developer and secured by way of a S106 legal agreement. This commitment will include:

- i.) a minimum of 20% of total jobs created by the construction of the qualifying development will be secured for local residents or apprenticeships. Opportunities for training and placement schemes targeted at local residents in respect of any jobs created through the end use of any non-residential development will also be explored.
- ii.) A developer contribution will be required towards employment and skills initiatives in Crawley.

### Reasoned Justification

- 9.50 *There is an evidenced disparity between the skills levels obtained on average by Crawley residents, and those of the in-commuting workforce. Crawley's resident workforce has a lower than average level of Qualifications at NVQ4 and above (33.2%) when compared to the South East region (42.2%) and Great Britain (39.3%) as a whole. The emerging update to the Economic Growth Assessment (2019) finds*

*that whilst positive steps are being made, the borough is still behind both Horsham (42.3%) and Mid Sussex (46.3%).*

- 9.51 *Reflecting the skills' profile, a lower than average proportion of Crawley residents are employed in higher skilled, higher earning occupations, when compared to the South East and Great Britain ratios. The 2014 EGA found average weekly earnings (resident based) were highest in Horsham and Mid Sussex (£583 and £578 respectively) and above the South East average (£555), but lower in Crawley (£510).*
- 9.52 *Crawley is also below its neighbours in terms of Gross Value Added (GVA), a measure of workforce productivity. Average GVA per Crawley worker is £51,309, compared to £57,141 in Horsham District and £52,840 in Mid Sussex. Crawley's GVA per worker is also lower than the average for South East England (£55,707) and that of the UK as a whole (£51,667).*
- 9.53 *As part of the council's Employment and Skills Plan, identifying and creating apprenticeships, training and job opportunities for local residents will continue to be a key objective from which support is sought from developers on major development schemes. A key priority for the council is helping local people and businesses benefit from the opportunities arising from development. This can be supported through the funding of skills, training and employment programmes and local employment and training obligations. Crawley Borough Council is committed to residents, investors, developers and businesses and the council will do all it can to deliver growth, which is inclusive and sustainable for all. The aim is to support local residents, young and old, into employment and raise the skills of the workforce so that they can access the new jobs being created across the borough.*
- 9.54 *Strategic Policy EC6 requires qualifying development to contribute towards addressing the skills gap in Crawley, helping to support the social mobility of Crawley residents and also meet the requirements of business. It will support appropriate social infrastructure through provision of employment, regeneration and training initiatives on major development sites at demolition and construction phases.*
- 9.55 *Crawley Borough Council is keen to ensure ongoing developer support for the provision of local training and employment agreements for all major developments. Proposals will be required to provide direct provision of employment and training initiatives by the developer together with a financial contribution towards an agreed and established programme with a local partnership. The training is for the benefit of the construction industry as a whole, to mitigate the impact of the predicted skills shortage in the sector. It is necessary to meet policy objectives in respect of Social Infrastructure in providing suitably trained individuals required for construction services for new development. The training provision would be for people living within the administrative boundary of Crawley and directly related to the employment needs of the development with the aim to maximise opportunities to develop local skills and business performance and expand employment provision.*
- 9.56 *An obligation will ensure contributions towards the borough wide coordination of training and employment schemes to support local people to employment within the construction industry. Seeking contributions for the co-ordination of training, benefits all parties by providing employment, training, enabling sustainable development and mitigating the potential for delays to the construction process. A local workforce will enable easier recruitment and retention and will reduce the environmental impact of a commuting workforce. The advertising of all jobs, which relate to the development, should be accessible to local people through local, approved employment agencies such as Employ Crawley, Crawley College, Jobcentre Plus and its partners.*
- 9.57 *Contributions would also contribute towards a workplace co-ordinator within our flagship project, Employ Crawley, to further facilitate easy routes to employment with*

*contributions directly relating to the construction of developments and training for local people benefiting the major development sites across the borough.*

- 9.58 *Securing contributions towards employment and training will enable the council and delivery organisations to:*
- engage in long term planning of the scheme;*
  - benefit residents and trainees, who are then able to develop their skills and qualifications both on and off site;*
  - support developers in achieving a commitment to local employment and training;*
  - support the development industry.*
- 9.59 *A planning obligation for employment and training may include a number of elements, such as:*
- a contribution by the developer towards pre and post construction training;*
  - a commitment to recruit residents for jobs pre and post development;*
  - the provision of waged construction training placements on the development site;*
  - larger schemes to include the provision of a serviced, on site recruitment and/or training facility;*
  - the provision of information that the council can use to monitor the success of the scheme;*
  - the developer to enter into a partnership with a local college or training provider.*

#### Financial Contributions

- 9.60 *Contributions on all development will need to be agreed in detail by the council and the developer and be met prior to the commencement of development.*

#### **Policy EC6: Employment and Skills Development Consultation Questions:**

- What is your view on the principle of seeking developer contributions towards Skills from new developments?
- Is the link from these proposed developments in Crawley to Skills and Social Mobility clear? What additional evidence and justification is needed?
- How best can the planning system help to address the skills gap? Are there other mechanisms or opportunities which should be included as part of this policy?

#### **Creative Industries**

- 9.61 In considering the incorporation of the very wide ranging remit of Arts, Culture, Creative and Digital Industries opportunities within the Local Plan, it is recommended to collectively refer to these as “Creative Industries”.
- 9.62 Whilst the adopted Local Plan has a flexible approach to such uses, most of which fall within the B Use Class categories already, it is not explicit in its support for this type of development.
- 9.63 It is considered that designating a specific area or group of buildings for these uses would be overly prescriptive and would constrain the appropriate use of buildings. This ‘zoning’ approach has been applied in large cities with areas of vacant urban land such as Liverpool, Leicester, London, but would be challenging in Crawley where land supply is limited and there are competing uses. The preferred approach is, therefore, to bring forward a policy that defines, and is supportive of, the Creative Industries.

## Strategic Policy EC7: Creative Industries

The growth of Crawley's creative industries, defined below, will be positively considered and supported wherever possible:

- Advertising & Marketing
- Architecture
- Arts/Crafts, Markets and Food & Drink stalls
- Culture and Exhibitions
- Design/Digital Design (including product, graphic and fashion design)
- Film, TV, video, radio and photography
- IT software and computer services, including gaming
- Publishing
- Museums, galleries and libraries
- Music, performing and visual arts
- Arts/Crafts workspaces/studios.

### **Reasoned Justification**

- 9.64 *Work is ongoing to understand the potential for Creative Industries in Crawley. The LEP has identified Crawley as a particular focus for the Creative Industries, and through the emerging Northern West Sussex Economic Growth Assessment, the council will seek to quantify this interest into floorspace and job growth figures.*
- 9.65 *Work undertaken by the Arts Council through its Active Lives survey shows that Crawley performs lower in terms of participation compared to neighbouring areas. Crawley is identified as being in the bottom 33% of the country for low involvement in the arts (the only area listed in West Sussex).*
- 9.66 *Dark fibre (ultra-high speed internet) roll out will be a significant advantage in attracting creative industries, particularly tech industries (Policy IN3).*

### **Policy EC7: Creative Industries Consultation Questions:**

- Is the proposed definition of "Creative Industries" correct? Is anything missing?
- Does the policy go far enough to support the introduction of such industries into Crawley?
- Should there be a stronger, more restrictive approach to prefer Creative Industries over others, in any particular locations in Crawley? What would be the evidence and justification to support this?
- Are there any particular sites which should be allocated or promoted for the Creative Industries?

### **Flexible Temporary Art and Creative Uses**

- 9.67 For some sites and buildings with planning permission, buildings may be vacant, sometimes for up to three years, whilst the permission is implemented (e.g. Overline House). It has been suggested that the Local Plan review could explore the scope to allow flexible temporary use of vacant buildings to support the Creative Industries, for example through pop-up stores/cafes, exhibition/events space, community use).

## Strategic Policy EC8: Flexible Temporary Art and Creative Uses

The growth and evolution of Crawley's cultural facilities and creative industries is encouraged. Temporary 'meanwhile' use of vacant commercial premises, open space and

public realm for performance and creative work will be supported, subject to the scale and nature of the proposed activity and the requirements of other policies.

In particular, the temporary use of vacant properties and land for 'pop-up' or 'meanwhile' uses for cultural and creative activities, including temporary SME uses, during the day and, where appropriate, at night-time, will be supported, to stimulate vibrancy and promote diversity in the town centre, neighbourhood centres and other suitable areas.

Considerations will include availability of parking and sustainable transport links and matters of highway safety; and noise generation and potential for disturbance to adjoining properties, particularly residential.

### **Reasoned Justification**

9.68 *The use of temporary buildings and spaces for cultural and creative uses can help stimulate vibrancy, vitality and viability in town centres and other areas by creating social and economic value from vacant properties. Such 'meanwhile' uses can also help prevent blight in the town centre, maintain active frontages and reduce the risk of buildings falling into disrepair. The benefits of meanwhile use also include short-term affordable commercial accommodation for SMEs and individuals, generating a short-term source of revenue for the local economy and providing new and interesting shops, cultural and other events and spaces, which can attract longer-term business investment. Parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties.*

9.69 *Events and activities such as festivals, seasonal markets, exhibitions, performances, outdoor concerts and busking are not always dependent on using a dedicated cultural facility or venue and can make use of a range of outdoor spaces including streets, parks and other public areas. These may include street markets and 'pop-up' bars and food stalls. These types of activities, which are often free, offer a way for everyone to experience and participate in Crawley's rich cultural life. The opportunity to incorporate these uses should be identified and facilitated through careful design.*

### **Policy EC8: Flexible Temporary Art and Creative Uses Consultation Questions:**

- Do you feel the above approach could be helpful in supporting the temporary use of buildings for Creative Industries?
- What issues should be considered in drafting a policy for temporary uses?
- Could the approach have unintended consequences or create issues for other nearby uses?
- Are all appropriate temporary uses covered by the terminology "art and creative"? Are there others which fall outside of this and should otherwise be supported by this policy? Please give examples and reasons.

### **Manor Royal**

9.70 Manor Royal is a Main Employment Area which includes Manor Royal Business District, City Place and County Oak Retail Park. Manor Royal is critical to the economic function of Crawley and the wider sub region. At approximately 240 hectares and with 500 businesses, it is one of the largest mixed use business areas in the South East, offering diversity, connectivity and scale at the heart of the economic areas of the Gatwick Diamond and Coast-to-Capital Local Enterprise Partnership. Excellent transport links provide access to a wide catchment of suppliers, customers and staff, and being situated just 30 minutes from both Brighton and London, it is a focal location for employment at the Heart of the Gatwick Diamond.

- 9.71 The ambition for Manor Royal relies on the systematic enhancement of its existing strengths of scale, diversity, connectivity and location. The Local Plan, therefore, positively promotes Manor Royal as the premier business destination at the Heart of the Gatwick Diamond, actively promoting economic development within the B Classes, and other uses where these support the overall function of Manor Royal as a business destination. The Manor Royal Design Guide Supplementary Planning Document plays a key role in achieving this vision, guiding the delivery of qualitative improvements to the area's environment through the implementation of high design standards at key gateway sites and frontages.
- 9.72 By using positive planning to facilitate development in the area, and improve the quality of the environment, the council, in partnership with stakeholders and local businesses, will:
- provide an environment that supports and encourages business growth;
  - build on the unique business and physical attributes afforded by its location and history; and
  - achieve an attractive and desirable working environment.

### Strategic Policy EC9: Manor Royal

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 B Use Class and would result in the reuse, intensification, or change of use of the land or buildings.

Proposals that are not for B Use Class development will be permitted at Manor Royal if it can be demonstrated that they are of a scale and function that enhances, and does not undermine, the established role and business function of Manor Royal.

All development at Manor Royal should contribute positively to the overall setting and environment of the Main Employment Area as a business district through high quality design and landscaping that is in accordance with the Manor Royal Design Guide Supplementary Planning Document.

Where developments involve a net increase in gross internal area in excess of 50sqm., the council will usually seek a proportionate financial contribution towards public realm improvements in Manor Royal, subject to appropriate projects being identified.

#### **Reasoned Justification**

- 9.73 *The Economic Growth Assessment 2019 identifies significant demand for Business floorspace over the Plan period. The required amount of business land take outweighs the available employment land supply, and for this reason the EGA recommends that business (B Class) employment floorspace at Manor Royal should in the first instance be protected, enabling the Business District to operate as the leading business destination for Crawley and in the wider context of the Gatwick Diamond.*
- 9.74 *To further protect the business function of Manor Royal, a number of Article 4 Directions are in force. These remove national permitted development rights that had previously allowed the change of use of B1a offices, B1c light industrial, and B8 warehouses premises to convert to residential.*
- 9.75 *It is also recognised that Crawley's economy is a diverse one, and there is market demand for a range of uses beyond the traditional B Use Classes. Therefore, the loss of business (B Use Class) floorspace to other economic development uses may be acceptable but only where proposals would support the needs of business and*

would enhance the overall economic role and function of Manor Royal as a 21<sup>st</sup> Century Business District. Through the Manor Royal Design Guide SPD, the Policy approach supports ambitions for an improvement in the look and feel of the Main Employment Area as a business district, striking a balance between the appearance of buildings and their settings whilst allowing flexibility for standard model buildings, thus not impacting unnecessarily on viability.

- 9.76 Manor Royal also includes the area at County Oak, which has an established retail warehouse function. County Oak (together with London Road Retail Park) should remain the focus for any out-of-town retail proposals subject to compliance with the sequential assessment and impact testing as required in Policy EC7.
- 9.77 Crawley Goods Yard and railhead is located within Manor Royal and provides an important function in the processing and bulk transportation of minerals and aggregates. As required by the NPPF, the existing railhead and associated storage and handling facilities are safeguarded from other forms of development through Policy M10 of the West Sussex Minerals Local Plan (2018). This is reflected on the Local Plan Map, and West Sussex County Council (WSSCC) should be contacted in relation to any planning proposals at this location. This Plan identifies Minerals Consultation Areas (MCAs) as its approach to implementing effective mineral resource safeguarding in West Sussex. The MCAs in Crawley included in the WSSCC Minerals Local Plan are shown on the Local Plan Map.

#### **Policy EC9: Manor Royal Consultation Questions:**

- Does the draft policy, as worded, sufficiently support the business function of Manor Royal whilst allowing flexibility for appropriate business supporting uses?

### **Employment Development and Residential Amenity**

- 9.78 There are some residential areas in Crawley which are located close to Main Employment Areas. Some employment uses may be incompatible with the surrounding uses, and in these circumstances impacts on the amenity of the residential area must be taken into consideration to ensure that the relationship between employment and residential use is positively managed. In other locations, new residential development is proposed close to existing employment uses, in which case the residential scheme should be designed to ensure that the employment use will not affect the amenity of new residents.

#### **Strategic Policy EC10: Employment Development and Residential Amenity**

Where residential development is proposed within or adjacent to Main Employment Areas, the principal concern will be to ensure that the economic function of the area is not constrained. The residential use must be designed to mitigate any impact from the existing employment use on the new residents.

Proposals for the development, redevelopment or change of use of sites for employment use adjacent to residential areas will be permitted where there is no adverse harm to the amenity of local residents.

Particular care should be taken within the Manor Royal Buffer Zones, where business and business-supporting uses will be permitted provided that proposals do not adversely impact upon the amenity, function and setting of nearby residential uses.

### **Reasoned Justification**

- 9.79 Most existing employment areas are suitable for a range of employment generating uses, subject to the policies set out in the Character and Economic Growth chapters

and other policies in this Local Plan. However, there may be uses that can give rise to problems for adjacent existing housing areas. In these locations, it will be necessary for any development proposal to ensure such sensitive areas and the amenity of local residents has been fully addressed and that the development accords with other Local Plan policies, particularly Policies CD6: Normal Requirements for All Development; EP4: Development and Noise and EP5: Air Quality.

- 9.80 This is most notably the case at the south-east and south-west of Manor Royal, where there is little separation between nearby residential development and the Main Employment Area. Recognising the scope for conflict in these areas, Manor Royal Buffer Zones at Tinsley Lane and Tushmore Lane are identified on the Local Plan Map. Within these areas, particular care should be taken to ensure that economic development proposals do not adversely impact upon the amenity and setting of nearby residential uses.
- 9.81 Equally, it is recognised that the Main Employment Areas represent the key focus for economic development in Crawley, and the economic function of these areas should not be constrained by inappropriate new residential development. The amended Prior Approval process, which enables change of use from office to residential without the need for planning permission, has led to an increase in the amount of residential development coming forward within and adjacent to Main Employment Areas. Although the Local Plan is unable to manage the Prior Approval process, it is able to guide development where planning applications for residential development are put forward that would affect or be affected by Main Employment Areas. To promote the continued functionality of Main Employment Areas, where residential development is proposed within or adjacent to Main Employment Areas, regard will be had to the potential impact on the operation of existing economic uses as well as the amenity of future residents, as required by Local Plan Policies CD6, EC2, EC3, and EP4.

#### **Policy EC10: Employment Development and Residential Amenity Consultation Questions:**

- In light of the increased emphasis on “agents of change” and amendments to the Local Plan noise policy below, is this policy still necessary?
- Should the policy contain more detailed criteria for the different main employment areas rather than a single approach for all? Are there any characteristics of any of the main employment areas which should be taken into account in the application of this policy?
- Is there a role for live/work units in Crawley, and if so, where could these be best located?

### **Neighbourhood Centres**

- 9.82 As a New Town, Crawley has been built on the neighbourhood principle, with each neighbourhood providing its own local shops, facilities and services to support the day-to-day needs of residents. Although shopping habits have changed over time, feedback from the Local Plan consultations have shown that the neighbourhood parades remain an important part of Crawley’s make-up; representing a key aspect of Crawley’s character, serving as sustainable locations for local retail and employment and acting as hubs for day-to-day community life.

#### **Policy EC11: Neighbourhood Centres**

In neighbourhood centres, ground floor changes of use to other uses will be supported provided that proposals:

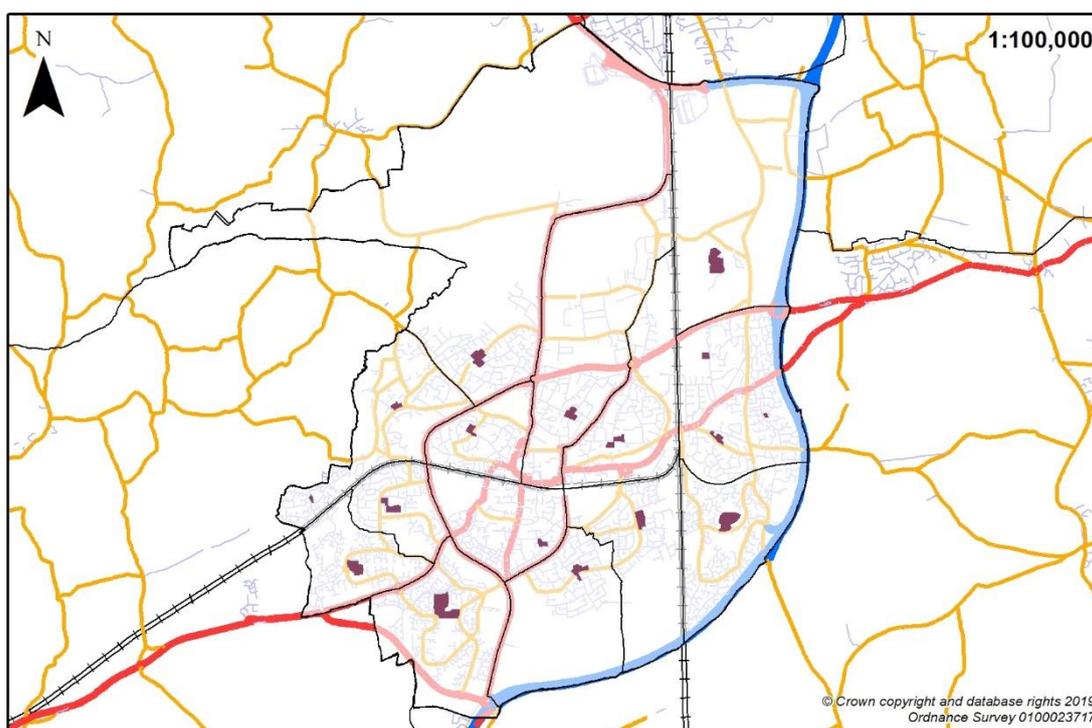
- i) are appropriate to the established role of the neighbourhood centre in terms of scale and function; and

- ii) will not adversely affect the ability of the parade to cater for the day-to-day needs of local residents; and
- iii) will not result in an adverse impact upon the amenity and environment of the locality; and
- iv) will maintain and where possible enhance the vitality and viability of the parade.

In addition to the parades, most neighbourhood centres provide floorspace that contributes to the town's wider employment function. These areas continue to be recognised as sustainable locations for smaller-scale employment use, and economic development proposals will be supported where they meet the policy requirements of Local Plan Policies CD2, CD6, EC1 and EC10.

**Reasoned Justification**

9.83 *The neighbourhood principles contained within the original Crawley masterplan continue to reflect Government guidance, particularly in meeting local needs and reducing the need to travel by focusing shops, schools, small-scale employment uses and community services and facilities in accessible locations. Throughout Local Plan consultations, residents have highlighted the important role of the neighbourhood parades and a desire to see their retail-led function maintained for future years. The role of neighbourhood centres in each neighbourhood will, therefore, be protected to ensure this important function is maintained.*



Neighbourhood Centres (Policy EC11)

9.84 *The function of the parades has gradually changed over time, and in addition to shops that perform a local shopping function, many parades are now home to more specialist retailers (for example, bridal wear or musical instruments) supported by a range of non-retail uses including takeaways and betting shops. Whilst non-retail uses can provide an important local function, there is risk that the presence of too many can undermine the ability of the parade to meet local shopping needs and all are still anchored by at least one convenience retailer. It is vital, therefore, that each neighbourhood parade continues to offer a good balance of shops and services to*

*support residents' day-to-day needs, whilst providing flexibility to allow for other appropriate uses.*

#### **Policy EC11: Neighbourhood Centres Consultation Questions:**

- Does the policy wording adequately protect the function of the neighbourhood centres in meeting the day-to-day needs of residents?
- Has the function of the parades changed, meaning that greater flexibility for different uses is required?

### **Rural Economy**

- 9.85 Supporting new small-scale economic development and tourism creates jobs and prosperity by encouraging the appropriate economic growth of rural areas beyond the Built-Up Area Boundary.
- 9.86 The borough contains some agricultural, commercial and recreational enterprises in the countryside. It is inevitable that these will have development needs. Whilst positively promoting the rural economy, it is vital that these needs are balanced against the overall strategy to limit the urbanising effect of development on the countryside, and the need for such activities to be in accessible locations. As recognised within the NPPF, the sequential test will not be required for small-scale rural offices or other small-scale rural development.

#### **Policy EC12: Rural Economy**

The following development is supported beyond the built-up area boundary:

- a) New small-scale economic development, including tourism-related development;
- b) The reuse of existing buildings or land for business or tourism;
- c) The extension or replacement of buildings, when well-designed.

Development and diversification of agricultural and other land-based rural businesses will be permitted, provided the business is ancillary to the operation of the holding and situated on, or adjacent to, the holding.

Development proposals which would cause the permanent loss of the best and most versatile agricultural land (Grades 1, 2 and 3a in the DEFRA Agricultural Land Classification system) will not be permitted unless it can be demonstrated to the satisfaction of the borough council that there are no appropriate alternatives and there are over-riding sustainability benefits.

Any proposal must also meet the requirements of Policy LC5: Development Outside the Built-Up Area.

### **Reasoned Justification**

- 9.87 *The council recognises the need to support the economic needs of the main urban area and rural communities beyond by responding positively to opportunities for growth. National planning policy guidance requires planning policies and decisions to enable:*
- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*
  - b) the development and diversification of agricultural and other land-based rural businesses;*
  - c) sustainable rural tourism and leisure developments which respect the character of the countryside; and*

*d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.*

9.88 *This Policy supports economic growth in Crawley's rural areas in order to create jobs and prosperity. A positive approach is taken to sustainable new development that respects the character of Crawley's urban rural fringe and countryside beyond.*

**Policy EC12: Rural Economy Consultation Questions:**

- Is this policy still justified?
- Is it in accordance with national policy?
- Is there anything else this policy should include?

## Gatwick Airport

- 10.1 Gatwick Airport lies within the borough of Crawley and at peak times is the busiest single runway airport in the world. In 2018/19, Gatwick Airport handled 46.4million passengers. Following the work of the Airports Commission to examine the scale and timing of any requirement for additional runway capacity in the south east, the government set out its preferred option for a new Northwest runway at Heathrow in the “Airports National Policy Statement, (NPS): new runway capacity and infrastructure at airports in the South East of England”, adopted in June 2018. The NPS also references the Airports Commission’s findings on the need for more intensive use of existing infrastructure at other airports. In its document, “Beyond the Horizon: The Future of UK Aviation: Making best use of existing runways”, June 2018, the government recognises that the DfT’s latest aviation forecasts (2017) reflect accelerated growth at London’s main airports. This is putting pressure on existing infrastructure, despite significant financial investments by airports over the past decade. “Beyond the Horizon”, therefore, sets out the government’s support of airports beyond Heathrow making best use of their existing runways, provided that all relevant considerations, particularly economic and environmental impacts and proposed mitigations are addressed.
- 10.2 The government has published its draft Aviation Strategy, “Aviation 2050; The Future of UK Aviation 2018” which aims to achieve a safe, secure and sustainable aviation sector that meets the needs of consumers and a global, outward-looking Britain. It supports the growth of aviation and the benefits this would deliver, provided that growth takes place in a sustainable way, with actions to mitigate the environmental impacts. The draft document states that there is not yet evidence of future need for further runway capacity beyond Heathrow, and that this would need to be determined by a future study by the National Infrastructure Commission. It does recommend that it is “prudent” to continue with a safeguarding policy to maintain a supply of land for future national requirements but leaves it up to local authorities in their Local Plans to consider the future needs of airports. The council has sought greater clarity on the requirement to safeguard land in the final Aviation Strategy anticipated to be published in December 2019. Until this new document is published, the National Aviation Policy Framework, 2013, makes it clear that land outside existing airports which may be required for airport development in the future needs to be protected against development which would be incompatible with the potential development of future runways.
- 10.3 In August 1979, Gatwick Airport and WSCC entered into a Legal Agreement preventing the construction of a second operational runway at Gatwick for a period of 40 years. That Agreement will expire in August 2019. There is also a S106 Agreement between Gatwick Airport, WSCC and CBC which supports the growth of the airport by making best use of its existing one runway, two terminal configuration, whilst ensuring that measures are in place to minimise its short and longer-term environmental impacts. It also considers how the councils around the airport work together to bring benefits to the Airport and the communities it serves and affects. The latest iteration of this S106 was signed in April 2019.
- 10.4 The draft Gatwick Airport Master Plan (October 2018) anticipates capacity on its single runway could increase by about 15million passengers per annum, The draft Master Plan also sets out two further scenarios for growth of the airport, through use of the existing standby runway and through continuing to safeguard land for an additional runway to the south of the airport.

- 10.5 Gatwick Airport generates a significant number of economic benefits both directly through its own employment requirements but also, indirectly, through the wider benefits to the regional and local economy which make Crawley and the wider Gatwick Diamond area attractive to employers and businesses. However, it also creates significant environmental impacts as a result of air traffic movements and surface access to the airport.
- 10.6 The borough council is consulted on any developments which the airport operator proposes to undertake under its extensive permitted development rights. The council as the Local Planning Authority also determines any planning applications for more significant developments which are not classified as permitted development. Growth in capacity of the airport over 10mppa, for example the routine use of the standby runway, would be considered as a Nationally Significant Infrastructure Project under the Planning Act 2008, and as such would be considered by the Secretary of State, advised by the Planning Inspectorate through the Development Consent Order process.

### Chapter Content

- 10.7 This chapter combines the planning policy considerations which are specifically relevant to the future development of Gatwick Airport.

### The Key Issues

- 10.8 The presence and operation of an international airport within the borough generates specific planning issues which need to be addressed by local planning policies. As well as the consultation responses there are also number of key evidence based documents which will also need to be taken into account including the national policy background in terms of airport growth and runway issues.
- 10.9 The main evidence based documents are:
- Aviation Policy Framework (DfT, March 2013)
  - Aviation 2050; The Future of UK Aviation Consultation (DfT, December 2018)
  - Airports National Policy Statement (HM Government, 2018)
  - Beyond the Horizon; The Future of Aviation; Making Best Use of Existing Runways (HM Government, June 2018)
  - 2019 Legal Agreement between CBC, WSCC and the airport operator
  - Draft Gatwick Airport Master Plan (Gatwick Airport Limited, October 2018)
  - Gatwick Airport Surface Access Strategy (Gatwick Airport Limited, May 2018)
  - Gatwick Airport Interim Parking Strategy (Gatwick Airport Limited, February 2017)
- 10.10 More details on these documents are included in the Reasoned Justifications for the policies.

#### Gatwick Airport Chapter Consultation Questions:

- What key issues do you think should be considered to ensure any growth at Gatwick Airport is sustainable?
- Do you agree airport-parking should be located on the airport, or do you think it could also be provided off airport and, if so, where?
- Should land south of Gatwick Airport continue to be safeguarded for a potential future wide-spaced additional runway?
- Should the Airport Boundary be changed to the boundary shown in the Airport Master Plan?

### Development of the Airport

10.11 Annual passengers at Gatwick Airport are increasing each year, reaching 46.4million in 2018/19. This is due to a combination of more use of the airport in off-peak periods, larger aircraft and greater load factors, and more intensive use of the runway. The draft Gatwick Airport Master Plan (October 2018) anticipates these factors could increase capacity on its single runway to 53million passengers per annum (mppa) by 2023, and 61mppa by 2032 due to advances in air traffic management technology. The draft Master Plan also sets out two further scenarios for growth of the airport, through use of the existing standby runway which could increase capacity to 70mppa by 2032, and through continuing to safeguard land for an additional runway to the south of the airport which could increase capacity to around 95mppa over 25 years.

### Strategic Policy GAT1: Development of the Airport with a Single Runway

Within the airport boundary as set out on the Local Plan Map, the council will support the development of facilities which contribute to the sustainable growth of Gatwick Airport as a single runway, two terminal airport provided that:

- i. The proposed use is appropriate within the airport boundary and contributes to the safe, secure and efficient operation of the airport; and
- ii. The impacts of the operation of the airport on the environment, including noise, air quality, flooding, surface access, visual impact and climate change, are minimised, where required appropriate mitigation is provided and, as a last resort, fair compensation is secured; and
- iii. Adequate supporting infrastructure, particularly for surface access, is in place; and
- iv. Benefits to Crawley's local economy and community are maximised.

Mitigation, compensation, infrastructure and benefits will be expected to be secured through a S106 Agreement.

Where development to enable sustainable growth at Gatwick Airport will be a Nationally Significant Infrastructure Project, i-iv above will be expected to be met by the airport operator and secured through a S106 Agreement.

If land is required to be safeguarded for future runway growth, any development of the airport in the meantime should not be incompatible with the potential expansion of the airport to accommodate the construction of an additional wide spaced runway.

### Reasoned Justification

10.12 *Much of the recent significant growth in passenger numbers at Gatwick Airport, through the use of larger aeroplanes and more flights at "off-peak" times and seasons, has not required new development to support it. The Airport Operator also has extensive permitted development rights for new facilities to support rising passenger numbers. Measures are in place. However, through the S106 Agreement between CBC, WSCC and Gatwick Airport to mitigate some of the adverse impacts of airport growth, and where planning permission is required for new development at the airport, the council will need to ensure that it contributes to the safe and efficient operation of the airport and that its impacts are minimised or mitigated as required, sufficient supporting infrastructure is in pace, and local benefits are maximised. The council will also consider the cumulative impact of numerous small developments. A further S106 Agreement will be sought.*

- 10.13 *The government’s policy statement, “Beyond the Horizon, Making Best Use of Existing Runways” explains that Airport growth increasing capacity above 10mppa would be considered to be a Nationally Significant Infrastructure Project and would therefore be determined by the Secretary of State through the Development Consent Order (DCO) process. The draft master plan proposal to use the standby runway would increase capacity by about 11mppa and would therefore be determined through a DCO. The council would expect the environmental impacts to be minimised, and mitigated, infrastructure provided and benefits to the local area maximised.*
- 10.14 *Proposals that contribute to the safe, secure and efficient operation of the airport are considered to include operational uses such as terminals, runway facilities, aircraft maintenance, freight handling facilities; directly related development including transport interchanges, admin offices and parking; as well as less directly related development (e.g. hotels, conference and leisure facilities, offices and retail) where the relationship to the airport is explicitly justified and is of an appropriate scale relative to airport activities. In all cases, proposals should have regard to NPPF paragraph 95, promoting public safety through anticipating and addressing possible malicious threats, including through proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security.*
- 10.15 *If land continues to be required to be safeguarded to the south of the airport for a potential future runway, it is important to ensure that development on the airport in the meantime is not incompatible with this future growth. This is to ensure that land take for the future runway is minimised, given the constrained land supply in the borough.*

**Policy GAT1: Development of the Airport with a Single Runway Consultation Questions:**

→ Government policy supports the sustainable growth of airports. Do you consider Policy GAT1 includes the appropriate measures to ensure any growth at Gatwick Airport is sustainable and its impact on the local area will be minimised?

→ Are there any other measures you think should be included?

Airport Boundary:

→ The draft Gatwick Airport Master Plan recommends that the Airport Boundary it includes is used to illustrate the perimeter of the airport. The extracted plan provided under the consultation questions for GAT2 shows how this differs from the Local Plan 2030 Airport Boundary. The council is considering whether or not it supports these proposed changed; do you have any comments?

**Future Runway Development and Need for Safeguarding**

- 10.16 Since 2003, Crawley Borough Council has been required by government policy to safeguard land at Gatwick Airport from development in order to accommodate the possible construction of an additional wide spaced runway and associated facilities. The government’s recently published draft Aviation Strategy, *Aviation 2050*, does not provide a definitive steer as to whether or not the council will be required to safeguard land moving forward. This Local Plan Review Consultation Document therefore seeks 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. It is hoped that the final Aviation Strategy, anticipated December 2019, will provide clarity as to whether or not the Government will require the Local Plan to include a policy that keeps safeguarding in place.

## Strategic Policy GAT2: Safeguarded Land

### Option 1:

#### Safeguarding for future runway growth

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.

Small scale development within this area, such as residential extensions, will normally be acceptable. The airport operator will be consulted on all planning applications within the safeguarded area.

The future noise impacts associated with a possible additional runway on safeguarded land will be taken into account in planning decisions in the borough.

### Option 2:

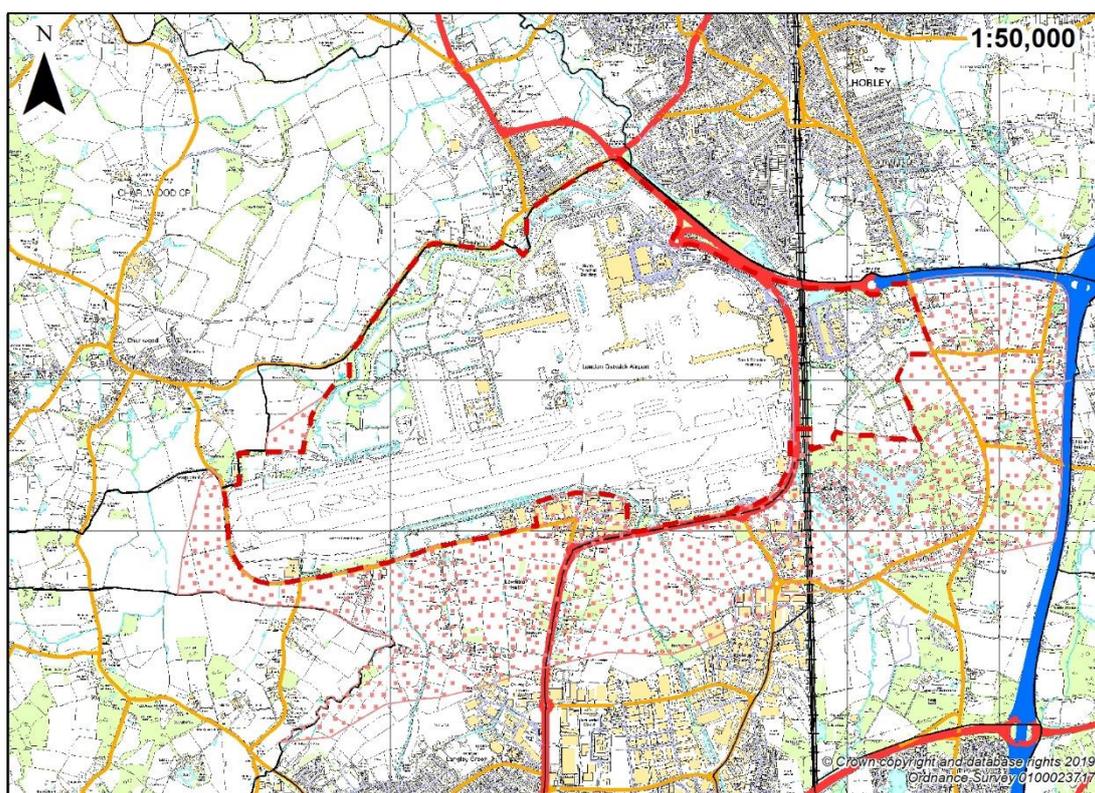
*Delete Policy (Reasoned Justification explains).*

### **Reasoned Justification**

- 10.17 *The original requirement to safeguard land for a second runway at Gatwick was contained in the 2003 Aviation White Paper. The Aviation Policy Framework (March 2013) clarified the position in paragraph 5.9 with regards to safeguarding in that land surrounding existing airports should be protected against incompatible development which may be required to meet future airport needs. 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. The airport operator will be consulted on all applications within the safeguarded area for a second runway.*
- 10.18 *The land shown as safeguarded for a second runway on the Local Plan Map 2015 reflects that shown in the 2012 Gatwick Airport Master Plan, which is based on the need to cater for a wide spaced parallel runway as required by the 2003 Aviation White Paper. The 2018 Draft Gatwick Airport Master Plan identifies a slightly different area for the expanded airport, following further work it has undertaken on growth plans. The Master Plan requests that the land continues to be safeguarded, and that this area reflects the land identified in the draft Master Plan.*
- 10.19 *Separately, the government is consulting on its draft Aviation Strategy, Aviation 2050, published December 2018. The document does not give a clear steer to the council as to whether or not land should continue to be safeguarded at Gatwick Airport, stating in para. 3.66, “that it is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements”, highlighting “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” ” and stating that it is up to “local authorities to consider the future needs of airports and associated surface access requirements, when developing local plans”. Para. 3.12 of the draft Aviation Strategy states that there is not yet evidence of future need for further runway capacity beyond Heathrow, and this would need to be determined by a future study prepared by the National Infrastructure Commission. Currently, there is also no study or decision that, if a need is proven, this should be met by an additional runway at Gatwick (para. 3.14). The document suggests that this could be determined “by the industry”.*
- 10.20 *As a geographically constrained borough, Crawley has identified substantial unmet needs for both housing and employment. The adopted Local Plan 2015-2030,*

through Policy EC1, identifies land to the north of Manor Royal and south of the airport as an area of search, which could potentially accommodate Crawley's unmet business land needs were safeguarding to be lifted. Due to unacceptable impact associated with aircraft noise, this land cannot be used to accommodate housing. Therefore, the council is considering whether or not this Local Plan Review should continue to safeguard land for a further runway at Gatwick, and whether or not we have the "robust evidence" to do so.

- 10.21 Should safeguarding be removed, the council will consider appropriate land uses across the whole area, potentially through an Area-wide Action Plan. Individual applications in this area in advance of the conclusion of that work will be considered to be premature.
- 10.22 The final Aviation Strategy, anticipated in December 2019, may provide greater clarity on the requirement for safeguarding, but this Local Plan Review Consultation Document is seeking 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. However, it remains possible that the government will require the Local Plan to include a policy that keeps safeguarding in place.
- 10.23 Should the safeguarding policy remain in the Plan, the council considers that, where land is safeguarded for a potential future runway, the noise policy should ensure that new developments in the borough are protected from the potential future noise source from air traffic movements using this runway.



-  Gatwick Airport Boundary (Policy EC2, GAT1, GAT3, & GAT4)
-  Gatwick Safeguarded Land (Policy GAT2)

- 10.24 Until the position regarding safeguarding has been determined and any new policy approach formally adopted, land at Gatwick remains safeguarded and Policy GAT2

of the Crawley Borough Local Plan 2030 will be applicable to any applications in this area.

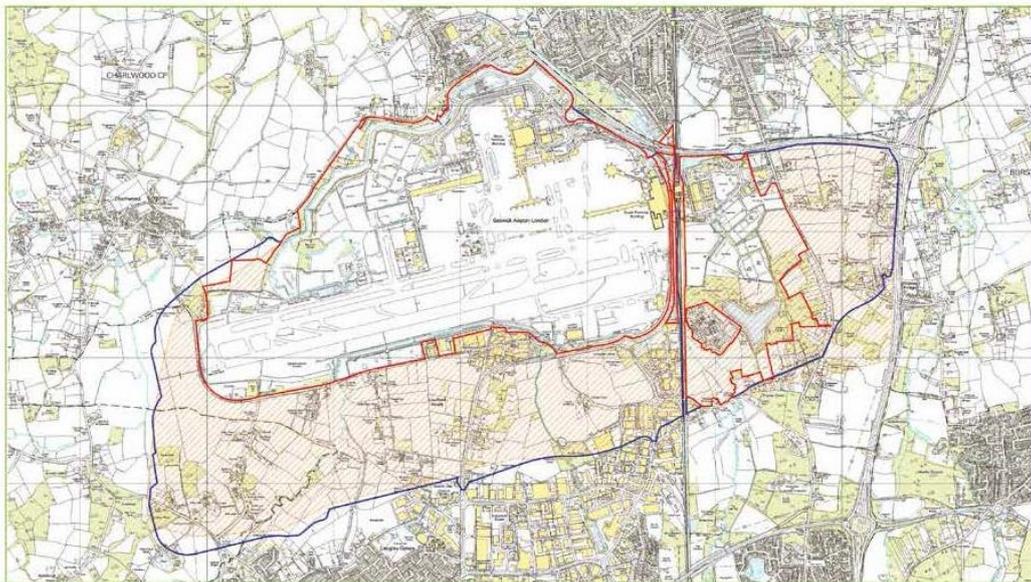
- 10.25 The issue of runway safeguarding should be distinguished from that of aerodrome safeguarding which considers the impact of proposals on the operation of aircraft. Policy CD6 of this Local Plan Review covers Aerodrome Safeguarding.

### Policy GAT2: Safeguarded Land Consultation Questions:

- Should the Local Plan 2035 continue to safeguard land for a future wide-spaced runway at Gatwick Airport, or not? Why do you think this?
- If the Local Plan does continue to safeguard land, should the boundary proposed for Option 3 in Gatwick Airport's draft Master Plan be used as the boundary of the safeguarded area?

Plans

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PLAN 21 - Safeguarded land Additional Runway



### Gatwick Airport Boundary and Safeguarded Land as shown in Gatwick Airport Draft Master Plan (2019)

- Please explain where and why if you suggest a different boundary.
- Do you agree that, if land continues to be safeguarded for a future runway, that the future noise impacts associated with that possible additional runway should be taken into account in planning decisions?

### Long Term Gatwick Related Car Parking

- 10.26 Passengers that fly in and out of Gatwick need to be able to travel to and from the airport by a variety of means of surface transport. The airport operator is required, through a S106 legal agreement, to prepare an Airport Surface Access Strategy (most recently published May 2018) to address and appropriately manage the surface access need of aircraft passengers and staff. Controlling the extent of airport related parking helps encourage the use of alternatives whilst ensuring sufficient parking is available to passengers who have no other option.

## Strategic Policy GAT3: Gatwick Airport Related Parking

The provision of additional or replacement airport-related parking will only be permitted within the airport boundary and must be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport.

### **Reasoned Justification**

- 10.27 *The 2019 S106 legal agreement between Crawley Borough Council, West Sussex County Council, and Gatwick Airport Limited sets out an obligation for the airport operator to achieve a target of 48% of passengers travelling to the airport by public transport. Achieving this still requires the provision of significant parking facilities for those who chose to drive to the airport by private car. Airport-related car parking includes parking associated with hotel guests leaving cars whilst flying from the airport. The Airport operator has updated its interim Car Parking Strategy (April 2017) to demonstrate the amount of car parking that needs to be provided as passenger throughput grows but is still commensurate with a target of 48% of passengers travelling to the airport arriving by public transport.*
- 10.28 *A significant number of these spaces are provided in on-airport locations within the airport boundary. There are also a number of well established businesses with the appropriate planning consents which provide long-stay Gatwick related parking in off-airport locations.*
- 10.29 *However, there are also a number of operators which offer car parking services to airport passengers which use sites that do not have planning permission for airport related car parking. This includes off-airport sites, without the appropriate planning permission, typically located in the countryside or previously developed land which has been used for employment or other purposes. Such off-airport sites are not in the most sustainable locations, may not be appropriate for parking and may lead to the loss of the countryside or employment sites.*
- 10.30 *It is considered that sites within the airport boundary provide the most sustainable location for the additional long stay parking which needs to be provided as passenger throughput grows whilst still supporting the public transport target. Sites within the airport boundary are close to the terminals and can help reduce the number and length of trips. The Airport operator is responsible for meeting the modal split target for passengers and the level of provision of car parking spaces makes an important contribution to meeting this target. It is therefore important that the provision of car parking spaces is appropriately managed in the most sustainable way.*

### **Policy GAT3: Gatwick Airport Related Parking Consultation Questions:**

- Do you agree that airport-related parking should be provided on the airport? Or do you think it could also be provided off-airport and if so, where do you think it would be appropriate?
- How best can the Local Plan support sustainable access to the Airport whilst ensuring that sufficient parking space is available on airport to meet the needs of users travelling by private vehicle? Do you agree that the airport operator has the responsibility to ensure that access to the airport is made in the most sustainable way?

### **Employment Uses at Gatwick**

- 10.31 A number of office developments at the airport had conditions placed on them when they were permitted to restrict them to airport-related uses. These are uses which contribute to the safe and efficient operation of the airport such as airlines, handling agents and the airport operator, who are involved in the direct provision of services relating to the operation of the airport.

## Strategic Policy GAT4: Employment Uses at Gatwick

The loss of airport-related office floorspace within the airport boundary will be permitted where it can be demonstrated that development will not have a detrimental impact on the long term ability of the airport to meet the floorspace need necessary to meet the operational needs of the airport as it grows.

New non-airport related commercial floorspace within the airport boundary will only be permitted where it can be demonstrated that this will not have a detrimental effect on the long term ability of the airport to meet the floorspace need necessary to meet the needs of the airport as it grows and will not have an unacceptable impact on the roles and function of Crawley Town Centre or Manor Royal.

### **Reasoned Justification**

- 10.32 *Recent years have seen an increasing level of vacant office property at the airport, due in part to the changing needs of airlines and airport businesses which require less office space than previously. The borough council has recently allowed the temporary relaxation of conditions for a period of three years on some office developments at the airport. Whilst recognising the changing nature of airport operations and the economic growth needs of the borough, it is important that the airport continues to be able to cater for operational needs without requiring, in the future, the development of additional land beyond its boundary to meet its operational needs as it expands.*
- 10.33 *In addition to existing office floorspace, on-going changes in airport operational trends and efficiencies may also provide scope for other buildings and sites within the airport boundary to be used for other purposes. It is important though that non-airport uses do not prejudice the current and future operational requirements of the airport as its passenger throughput increases. It is also important that the impact of non-airport related commercial development at the airport does not have a detrimental impact on the policy objectives for Crawley Town Centre and Manor Royal. Any proposals would also be tested against all other relevant policies in the Plan for development of this nature.*

### **Policy GAT4: Employment Uses at Gatwick Consultation Questions:**

- Given Crawley's limited available employment land supply, do you have any thoughts on this policy?

## Crawley Town Centre

- 11.1 At the heart of Crawley is the Town Centre, planned as a retail, commercial and civic centre as part of the New Town, extending from the historic High Street and around Queens Square. It is an important sub-regional destination for retail and leisure, and a designated Main Employment Area in the Local Plan. It is also a sustainable place for people to live, and its residential population has increased in recent years. Moving forward, significant new residential developments are planned and it is recognised that the Town Centre, as well as being a retail, leisure and employment destination, is becoming a neighbourhood in its own right.

### Chapter Content

- 11.2 The chapter establishes planning approaches for the town centre and sets out strategic and spatial policies to guide development within the town centre boundaries over the Plan period.

### The Key Issues

- 11.3 The Retail Capacity and Impact study has previously informed the town centre policy context for Crawley. However, since the adoption of the Crawley Borough Local Plan in 2015, significant changes have taken place and there has been a distinctive shift in proposals coming forward in the town centre. An updated Retail, Commercial Leisure, and Town Centre Neighbourhood Needs Assessment has been commissioned to forecast the need and capacity for a range of other main town centre uses over the Plan period to 2035, helping to ensure that the Local Plan is able to take a positive approach in supporting a vibrant and healthy Town Centre.
- 11.4 Much of Crawley town centre is healthy, vibrant and competitive, offering a good mix of shops, services and facilities and providing a pleasant environment for residents and visitors. The Town Centre has undergone significant regeneration, with £3.2m of improvements work to the public realm in [Queens Square](#), the heart of the town centre, now complete and plans to extend the improvements into the adjoining [Queensway and The Pavement](#) now well progressed.
- 11.5 Like many town centres, Crawley also faces challenges and is diversifying. Internet shopping has significantly affected the retail sector, and there has been an increasing shift towards a more diverse set of leisure-focused main town centre uses, particularly cafes and restaurants. Recognising the Town Centre as a well-connected and sustainable location for people to live, a growing residential population is adding further footfall and vibrancy.
- 11.6 Through positively planning for a range of main town centre uses that promote the day-time and evening economy, as well as residential development and a mix of appropriate supporting facilities and services, the Local Plan will continue to ensure that Crawley is able to build upon its established role as a vibrant and competitive sub-regional Town Centre.

#### Crawley Town Centre Chapter Consultation Questions:

- What makes you want to visit and spend time and money in Crawley Town Centre?
- Is there anything else you would like to see in the Town Centre? ?

- Crawley Town Centre is becoming a residential neighbourhood in its own right. What facilities and services are needed to support its growing population?
- How might these differ from the offer of Crawley's other neighbourhoods?

## Local Plan Policies

### Primary Shopping Area

- 11.7 The primary shopping frontages, including Queens Square, County Mall and The Martletts, provide a retail-led mix of uses, attracting a significant footfall of customers. The secondary frontages, including The Broadway, The Boulevard, Broad Walk and High Street, offer a more diverse range of main town centre uses, including restaurants, drinking establishments, takeaways and offices.

### Strategic Policy TC1: Primary Shopping Area

Development that promotes the vitality and viability of Crawley as a sub-regional town centre will be encouraged in town centre locations.

Located within the Town Centre Boundary, the Primary Shopping Area comprises the Primary and Secondary shopping frontages as identified on the Local Plan Map.

Within Primary Shopping Frontages, ground floor proposals for A1 (retail), A2 (financial and professional services) or A3 (restaurant) will normally be permitted.

Within Secondary Shopping Frontages, ground floor proposals for A1 (retail), A2 (financial and professional services), A3 (restaurant), A4 (vertical drinking establishment) and A5 (hot food take-away) will normally be permitted.

Proposals for other Main Town Centre Uses in the Primary Shopping Area will be permitted, provided it can be demonstrated that the proposed use would support the vitality and viability of the town centre.

In all cases, consideration will be given to the impact of proposed non-retail uses in terms of prominence and dominance within any given frontage, with account taken of individual unit frontage, overall frontage length, and the number of existing/extant non-retail uses. Issues of amenity and disturbance will be a material consideration in determining applications for change of use.

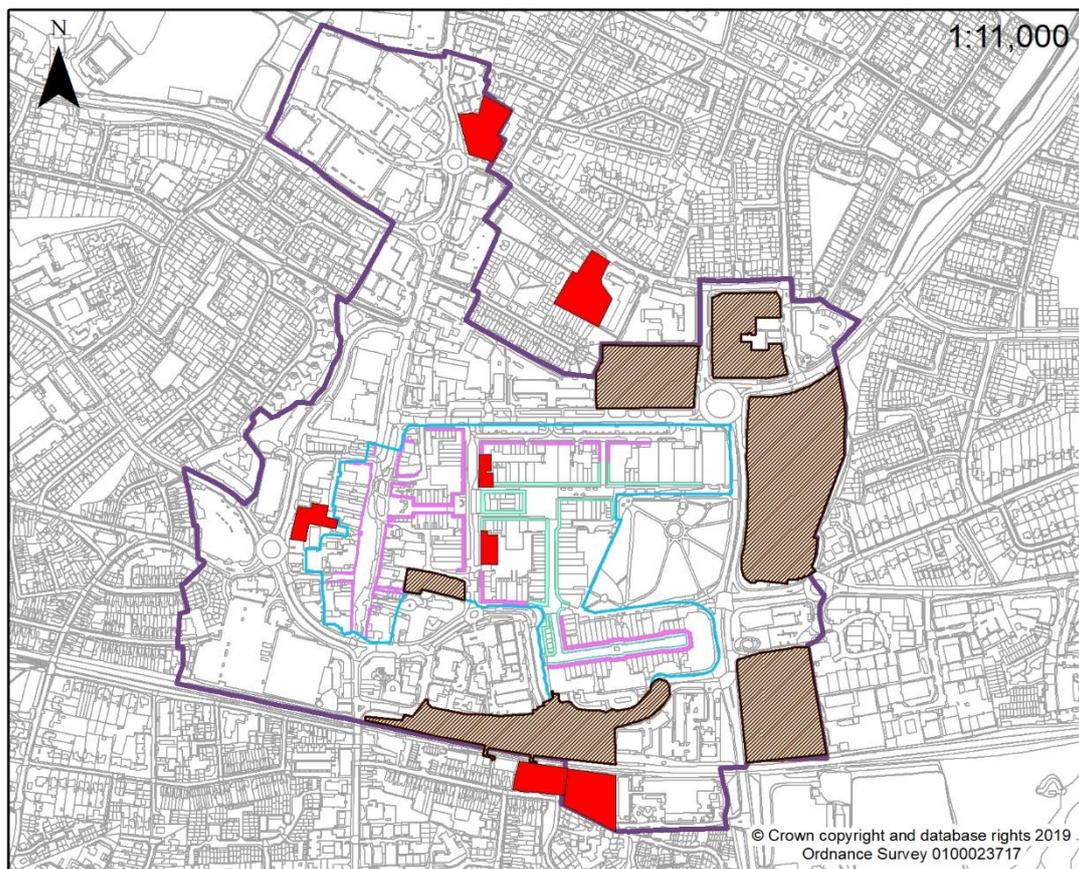
The effective and efficient use of upper floors within the Primary Shopping Area for Main Town Centre uses and for residential use, is encouraged.

### Reasoned Justification

- 11.8 *It is important that Local Plan policy is sufficiently robust to protect the town centre's key core retail function, whilst providing sufficient flexibility, where appropriate, to encourage a suitable provision of other main town centre uses in order to help support and revitalise the town centre. Policy TC1 therefore reflects the town centre objectives of the NPPF by encouraging a greater diversity of uses in the town centre, particularly regarding the promotion of the evening and night-time economy, whilst continuing to emphasise the importance of maintaining and enhancing a strong retail heart.*
- 11.9 *The Local Plan seeks to retain the retail core of the town centre in the primary frontage areas, whilst affording flexibility for other appropriate town centre uses along these frontages if it can be demonstrated that the proposed use would support the overall vitality and viability of the town centre. This flexible approach has helped ensure the reuse of vacant units, and since adoption of this approach in the Local*

Plan 2015-2030, Town Centre vacancy rates have fallen from 9.2% in January 2016 to 7.8% in April 2019.

- 11.10 The policies for secondary frontages and upper floors are even more flexible to encourage a full and diverse range of main town centre uses, and also residential use, that will contribute to the overall viability and vitality of Crawley's town centre.
- 11.11 It is not the intention of the policy to support residential development at the expense of the town centre as a main employment area, and whilst residential is supported in policy terms, it is vital that a balance is struck to ensure that the retail and economic role of the town centre is not undermined. Residential development will not be acceptable in locations where this would impact negatively on the vitality and viability of the town centre, and residential proposals that would undermine the function of the town centre as a main employment area will be refused. The Primary Shopping Area should retain a retail-led economic focus, particularly through promoting active frontages and an engaging street scene, and residential use is therefore unlikely to be acceptable at ground floor level in the Primary Shopping Area.



- |  |  |
|--|--|
|  Key Housing Sites (Policy H2)                        |  Primary Shopping Area (Policy TC1)       |
|  Town Centre Key Opportunity Site (Policy TC3 and H2) |  Primary Shopping Frontage (Policy TC1)   |
|  Town Centre Boundary (Policy EC2, TC1 to TC5, H2)    |  Secondary Shopping Frontage (Policy TC1) |

**Policy TC1: Primary Shopping Area Consultation Questions:**

→ Does the policy provide sufficient flexibility to support the ongoing vitality and viability of Crawley Town Centre?

- Does the Local Plan correctly designate the extent of the Town Centre Boundary and the Primary Shopping Area?
- What else can be done through the planning system to help Crawley Town Centre adapt to a changing economic climate?

## Town Centre Neighbourhood

11.12 Crawley Town Centre is recognised as a sustainable location for housing through the mixed use allocations of adopted Local Plan Policy EC6 (Development Sites within the Town Centre Boundary) and also through its identification under Policy H2 (Key Housing Sites) as a broad housing location. The Town Centre residential population has further increased through Permitted Development, a route through which over 400 new units have already been consented. This has meant the number of residents living in the Town Centre has significantly increased, and from a starting point of 214 residential units in 2014, there are now 831 dwellings in the Town Centre. It is anticipated that, over the Plan period to 2035, a further 2,200 dwellings will come forward in the Town Centre, bringing the total to just over 3,000 residential units.

### Strategic Policy TC2: Town Centre Neighbourhood Facilities

To facilitate the changing role of Crawley Town Centre, development of facilities and services that meet the needs of its growing residential population will be supported. Such Town Centre Neighbourhood Facilities may include:

- i. Local shopping facilities;
- ii. Community facilities, including community halls, flexible community space, and space for religious or faith activities;
- iii. Healthcare
- iv. Education
- v. Leisure provision.

Other uses that would demonstrably meet the needs of the Town Centre's residential population, will also be supported.

In all cases, Town Centre Neighbourhood Facilities must be delivered in a manner that supports, and does not undermine, the vitality and viability of the Town Centre.

### Reasoned Justification

11.13 *As a New Town, Crawley has been designed on the 'neighbourhood principle'; that is, the town has developed on a basis of planned neighbourhoods, each designed to provide its residential population with local access to the facilities and services required to meet the day-to-day needs of its residents.*

11.14 *Given its increasing residential population, the Town Centre is now beginning to become a neighbourhood in its own right. However, the rapid nature of this growth, combined with a significant proportion of the residential coming forward through Prior Approval (and therefore with no developer contributions), has meant that the Town Centre does not benefit from the same planned approach as Crawley's purpose-built neighbourhoods.*

11.15 *There is need to consider whether sufficient supporting infrastructure, facilities and services are in place to support the growing Town Centre population. It is accepted that a Town Centre neighbourhood will be very different in look and feel to Crawley's other neighbourhoods, but the new residents will still require access to community services as elsewhere in the borough. A Crawley Retail, Commercial Leisure, and Town Centre Neighbourhood Needs Assessment is being commissioned to assess the anticipated needs in greater detail.*

### **Policy TC2: Town Centre Neighbourhood Facilities Consultation Questions:**

- What facilities and services do you feel are needed to support the increasing Town Centre residential population?
- How best can Town Centre Neighbourhood Facilities be accommodated in a manner that supports, and does not undermine Town Centre vitality and viability?
- Which of these facilities need to be located inside the Town Centre Boundary, and which can be located elsewhere in Crawley?

### **Development Sites within the Town Centre Boundary**

11.16 Crawley performs an important role as a sub-regional town centre destination and main employment area, and the Local Plan seeks to build on its established function to promote regeneration and deliver a vibrant and competitive town centre. The Plan also recognises the role of the town centre as a location for main town centre uses, and as a sustainable location for living.

11.17 There are a number of sites within the Town Centre Boundary which are currently under-utilised and which present significant development opportunities to accommodate identified needs in sustainable and accessible locations. The Local Plan seeks to secure the regeneration and improvement of identified brownfield sites through mixed-use development proposals that will support and diversify Crawley's role as a sub-regional centre, enhance the vitality of the town centre, provide facilities for new and existing residents, improve links between different areas of the town centre, and create a good living and working environment. Recognising the identified need for both economic development and housing land, development proposals should seek to deliver mixed-use development that comprises main town centre uses and maximises opportunities to deliver residential development.

### **Strategic Policy TC3: Development Sites within the Town Centre Boundary**

Sites within the Town Centre Boundary provide an important opportunity to enhance town centre vitality and viability in a sustainable location through mixed-use development that meets the economic and housing needs of the borough.

The following sites are identified as Key Opportunity Sites within the Town Centre Boundary:

- County Buildings
- Telford Place
- Crawley Station and Car Parks
- Land North of The Boulevard
- Crawley College (mixed use development with priority for education)
- Cross Keys

At these sites, development of main town centre uses, or mixed use schemes which include a proportion of residential development and main town centre uses or town centre neighbourhood facilities, will be supported. This will be subject to demonstrating that the development:

- i) positively contributes to the competitiveness of Crawley Town Centre and sustainable economic growth in the borough; and
- ii) supports the delivery of a minimum of 4,806 net residential dwellings in the borough; and

- iii) supports the delivery of a minimum of 1,200 net dwellings cumulatively across these sites.

For the Crawley College site, any development must accord with an appropriate master plan agreed with the Local Planning Authority and covering the whole campus and will be required to demonstrate that it can be achieved in a manner that prioritises the ongoing viability and function of Crawley College as a Further Education facility.

Mixed use development at other sites within the Town Centre boundary will be supported where these provide a mix of residential, main town centre uses and/or town centre neighbourhood facilities.

In all cases, where retail or leisure uses are proposed outside the Primary Shopping Area, a sequential and impact assessment will be required.

### **Reasoned Justification**

- 11.18 *The council wishes to encourage the regeneration and efficient use of under-utilised town centre and edge-of-centre sites, particularly where this will maximise the potential of outworn buildings and underused land. Proposals should support and diversify Crawley's role as a primary sub-regional centre, enhance the vitality of the town centre, and support employment growth opportunities within the town. They should provide facilities for new residents, improve the links between different areas of the town centre and create a good living and working environment.*
- 11.19 *The adopted Local Plan 2015-2030 identified capacity to deliver up to 26,650 square metres of comparison (non-food) retail development up to 2030, representing a modest increase in floorspace. The emerging Retail, Commercial Leisure and Town centre neighbourhood Needs Assessment will update the retail capacity and leisure figure for the Plan period to 2035.*
- 11.20 *Developments within the town centre boundary could accommodate a mix of uses and ensuring a balance between meeting the economic and housing need for the borough is important. The town centre is a highly sustainable location for residential development and, given Crawley's high levels of housing need and constrained housing land supply, key opportunity sites have been identified in the town centre sites which can make an important contribution to housing delivery. At least 1,200 dwellings are anticipated across all of these sites, as part of mixed use proposals. A mix of uses on these sites will ensure the town centre's economic function is retained and enhanced, provide the opportunity to accommodate town centre neighbourhood facilities and, where necessary adjacent to public realm or road frontages, ensure active frontages are provided. Requirements set out in Policy H3d must also be adhered to when designing a scheme which includes residential element within the town centre.*
- 11.21 *Some proposals, which would be of significant benefit to the vitality of the town centre and help to meet other needs within the borough, may not be able to accommodate residential into schemes for operational or viability reasons. In these cases, information will be required to demonstrate how the proposals will deliver wider social and economic benefits and that the development as proposed would not impact unacceptably on the ability of the council to meet objectively assessed housing need. B1 office uses would also meet an identified need, and leisure uses would also support the regeneration of the town centre.*
- 11.22 *Whilst the Policy identifies a number of suitable locations for such development, it is not a comprehensive list and other sites may emerge over the Plan period.*

### Policy TC3: Development Sites within the Town Centre Boundary Consultation Questions:

- Are there any other sites you are aware of which should be included in this policy? Please provide details of the site and any supporting information including development aspirations.
- Is the policy sufficiently clear, or is greater clarity required?

### Active and Engaging Frontages

- 11.23 The role of Crawley Town Centre is changing, and to help safeguard its ongoing competitiveness, the Local Plan is positive in encouraging a range of main town centre uses, and is supportive of neighbourhood facilities, residential and mixed-use development. These uses can contribute to the vitality and viability of the Town Centre, but must be carefully planned and designed to ensure that new development appropriately engages and interacts positively with the public realm.
- 11.24 The use of active frontages, where there is an active visual engagement between the public realm and the ground floors of buildings, can generate vibrancy and encourage footfall. Active frontages can be incorporated into a range of main town centre developments to ensure that ground floor development that is adjacent to the public realm contributes positively to the Town Centre's overall sense of place and its role as a location for people to visit, live and enjoy.
- 11.25 Conversely, poorly designed development that does not appropriately engage with the public realm can undermine the Town Centre environment. Inactive frontages, for example blank facades or closed window displays, create a hostile and unwelcoming aesthetic that reduces legibility and vibrancy, and should be avoided.

### Strategic Policy TC4: Active and Engaging Frontages

Within the Town Centre Boundary, development at ground floor level will be required to achieve active frontages that engage positively with the public realm to promote a sense of vibrancy. Blank facades, or the appearance of blank facades, onto the public realm should be avoided.

Developments directly adjacent to public open space, whether street, formal or informal open space, must:

- a) provide a positive interface;
- b) Improve the visual and environmental qualities of a place;
- c) Improve the legibility of a place;
- d) Consider the rhythm, pattern and harmony of openings relative to its enclosure;
- e) Pay careful attention to the architectural expression of entrances, corners and projections; and
- f) Consider durability, maintenance, colour and pattern of façades.

### Reasoned Justification

- 11.26 *The use of active frontages in the Town Centre can play a key role in generating activity and supporting its overall vitality and vibrancy. Development that is adjacent to the public realm (whether the street, formal or informal public space, including parks) must provide a positive interface to the public realm.*
- 11.27 *In doing so, the positive relationship between a development and its adjacent public realm will better integrate the development into the urban fabric, promoting activity, interest and a sense of safety to its setting. This quality is assisted where the front facade of buildings, including the main entrance, face and open towards the street. The objective of achieving active frontages can be realised through a variety of means. Overall, the desirable outcome is avoiding blank walls to increase visual*

*interest, generate activity and improve surveillance. As residents will seek privacy, ground floor dwellings with windows fronting onto public realm or streets may create a blank façade as residents will use blinds or curtains permanently. The incorporation of other uses attracting visitors at ground floor level can help create activity, or residential schemes can be carefully designed to ensure active frontages are achieved through.*

## **Town Centre First**

11.28 The Local Plan vision recognises the vital role of Crawley town centre in providing a social, cultural, entertainment and retail focus for people and communities within Crawley and the wider area, and supports its evolution as a healthy and competitive centre. The Local Plan responds to national objectives by setting out requirements for the NPPF sequential and impact tests within a local context.

### **Strategic Policy TC5: Town Centre First**

Retail and leisure proposals in Crawley will follow the NPPF ‘Town Centre first’ approach, with development directed to the most sequentially preferable and sustainable locations, firstly within the Primary Shopping Area.

Proposals for edge-of-centre or out-of-centre retail or leisure development, will be permitted where it can be demonstrated that:

- a) the proposed development cannot be met on more central sites, having applied the sequential test; and
- b) the development will not have a significant adverse impact on the vitality and viability of the town centre, as existing and planned, or neighbourhood centres.

In assessing the impact of out-of-centre retail or leisure development under part b), an impact assessment will be required where the development would result in 2,500sqm gross floorspace or greater.

Existing out of town centre retail locations at County Oak and London Road Retail Parks have an established retail warehouse function and should remain the focus for any out-of-centre retail proposals. These locations are not designated centres, and therefore any retail or leisure development will be required to satisfy the sequential assessment and impact testing as per parts a.) and b.) above.

### **Reasoned Justification**

11.29 *For the purposes of policy interpretation, town centre sites are defined as those locations falling within the Primary Shopping Area as identified on the Local Plan Map. Sites falling outside of the Primary Shopping Area, though within the Town Centre Boundary, are defined as edge-of-centre sites and these would be the next most sequentially preferable sites. All locations beyond the Town Centre Boundary are, in retail terms, considered to represent out-of-centre locations.*

11.30 *As recognised through Policy EC9, office proposals at Main Employment Areas will be exempt from the sequential test, reflecting the important employment function of these locations, and the need to maximise the efficient use of employment land given the limited supply position. Both retail and leisure uses represent a key focus of the Crawley town centre offer, and inappropriate edge-of-centre and out-of-centre proposals have the potential to impact upon the vitality and viability of the town centre. Therefore, non-central development proposals for retail and leisure use will be subject to sequential and, if necessary, impact testing.*

11.31 *This Policy reflects the NPPF ‘town centre first’ approach, which recognises town centres as a focus for communities and seeks to maintain their vitality and viability by*

*requiring that development proposals for retail, leisure and office use are directed to town centre locations before other, less central, locations are considered. As per the NPPF sequential approach, if development proposals cannot be located within the town centre, edge-of-centre locations should be investigated and only if suitable sites are not available should out-of-centre sites be considered. The NPPF is clear in outlining that proposals for main town centre uses should in the first instance be directed to town centres, so as to promote their continued vitality, viability, and competitiveness.*

- 11.32 *The evidence base of the Crawley Retail Capacity Update (2013) had identified sufficient retail expenditure to support up to 26,650sqm comparison retail floorspace over the Plan period to 2030. Updated evidence is being prepared to identify the available capacity for convenience and comparison retail, and also commercial leisure uses, over the Local Plan Review period to 2035. Consistent with the NPPF approach to supporting Town Centre vitality and viability, the available retail capacity will be directed to the town centre in order to help facilitate mixed-use development of town centre sites and protect the continued competitiveness of Crawley town centre.*
- 11.33 *Where retail or leisure development is proposed outside of the Town Centre, impact on the vitality and viability of the town centre, and on planned town centre investment, will represent a material planning consideration. It is recognised that the impact of out-of-centre retail or leisure development will be determined by a number of factors, including (but not limited to) forecast trade draw and the extent to which the type of development proposed is considered to compete with or complement existing and planned town centre uses. As such, out of centre retail or leisure proposals will be required to demonstrate that the development will not result in a significant adverse impact on the town centre or deliverability of planned investment, particularly at the Key Opportunity Sites identified by Policy TC3. Where the impact threshold set out in Policy TC5 is triggered, applications should be accompanied by a proportionate impact assessment to demonstrate that the proposal is acceptable in impact terms, making clear how the proposed out-of-centre offer would complement, rather than compete with, the current/future town centre and neighbourhood centre offer.*
- 11.34 *Applicants should refer to the Town Centre Supplementary Planning Document for further guidance on the application of the sequential assessment and impact test in Crawley.*

**Policy TC5: Town Centre First Consultation Questions:**

- Do you think the town centre should continue to be the focus for retail and leisure activity? If not, why not?
- Is Policy TC5 sufficiently clear in advising when sequential and impact testing is required?
- Do you have any other comments on the policy?

## Housing Delivery

**Delivering Housing to meet Needs and Affordable Homes for Crawley and Reducing Homelessness: Housing Delivery**

*By 2035, about 4,800 new homes will have been built to support the needs of the growing population. A mix of new homes will be designed for residents in all stages of life. These will be built in locations which respect the town's unique development and design principles and preserve the most valued of the town's environmental features.*

## Housing

- 12.1 The population of Crawley has been rising significantly over the past three decades, increasing by about 22% from 88,750 in 1991 to 106,600 in 2011, it now stands at approximately 111,700 residents. In Crawley, population growth has been driven more strongly by natural change (i.e. births outnumbering deaths), due to the typically younger population structure reflecting its New Town history. Crawley also sees a notable level of international migration and net out-migration to other parts of the country. Crawley's population is expected to grow by 12% over the 20 year period to 2039.
- 12.2 Crawley provides a critical role in the Northern West Sussex Housing Market Area (comprising Crawley Borough, Horsham and Mid Sussex Districts and a small part of Reigate and Banstead Borough) offering a substantial stock of affordable, well-designed, family accommodation. In comparison to the other districts within the Housing Market Area, Crawley has a housing mix skewed towards smaller and cheaper housing, but with a high proportion of three-bedroom terrace properties built as a key component of the New Town housing stock. It also has higher levels of social tenure accommodating those unable to access private housing (rental or purchase), in contrast to other parts of the housing market.
- 12.3 The Northern West Sussex Housing Market Area overlaps strongly with the Crawley Travel to Work Area and is characterised by a high level of self-containment, reflecting the strength of Gatwick Airport and Manor Royal. However, whilst the labour market area extends to include Horley, Redhill, Leatherhead and Dorking (essentially extending north to the M25), there is a significant difference in house prices in the authorities north of the Housing Market Area.
- 12.4 Crawley is a compact borough, with developable land further constrained by the airport in the north of the borough. The town's recent history as a twentieth century new town means the area was comprehensively planned and built out on a neighbourhood basis. A further neighbourhood was added in the 1990s (Maidenbower), and the most recent neighbourhood, Forge Wood, located to the North East of the built-up area, is now under construction to provide around 1,900 dwellings supported by neighbourhood community facilities. In addition to these neighbourhood developments and limited intensification of the small areas of unconstrained land within the built-up area, a further new neighbourhood beyond the borough boundary to the west (Kilnwood Vale) in Horsham District is also under construction.

### Chapter Content

- 12.5 This chapter identifies policies that support appropriate residential development within the borough in line with the vision and priorities of this Local Plan Review. It sets the housing provision target for the projected Plan period and identifies key sites and policies to support the delivery of housing within the borough.

### The Key Issues

#### Existing Housing:

- 12.6 There are approximately 46,000 dwellings in Crawley. 60% of the town's housing is owner-occupied with 24% being affordable properties (social or affordable rent or part ownership). The number of people living in privately rented accommodation has increased significantly in the last 10 years, and accounts for over 15% of households

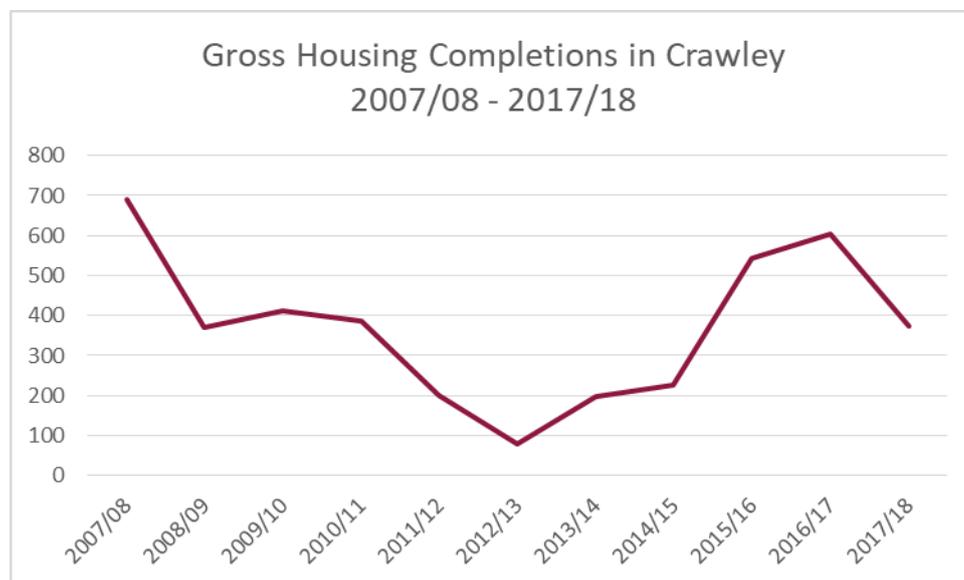
(in 2011) compared with 6% in 2001. Almost 97% of the affordable housing stock is rented, with the remainder being part-owned (shared-ownership). Terraced housing makes up the largest share of the stock (42%), with the rest comprising flats (23%), semi-detached (21%) and detached housing (14%).

- 12.7 Overall, the housing stock appears well suited to younger working people (single households and those with young families) seeking to enter the housing market, but the supply of larger housing and high-end market housing is more limited.

**Past House Building:**

- 12.8 The number of dwellings built each year has varied considerably in the last ten years. Following a peak in house building in 2007/08, there was a significant reduction in completions, despite a considerable number of planning permissions granted. This was largely due to the national economic downturn. Since the preparation and adoption of the current Crawley Borough Local Plan in 2015, delivery has been increasing, and completions have significantly exceeded the average annual requirement set out in the adopted Plan (340 dwellings per annum). Consequently, Crawley comfortably passed the government’s national Housing Delivery Test in 2018, at 181%.

- 12.9 Notwithstanding this, delivery fell short of the 2015 Local Plan Housing Trajectory. This predicted a peak in delivery in 2017/18, whereas delivery has fallen in comparison with the period 2016-17. This is primarily due to delays in the coming forward of a number of key site allocations. Of the 369 net completions in 2017/18 9% came from developments benefiting from permitted development rights for the conversion of offices to dwellings. This compares with 49% in 2016/17. Therefore, the lower delivery total in 2017/18 is largely associated with a decline in the number of units delivered within such schemes, whereas the number of units benefiting from planning permission actually rose slightly.



**Housing Need:**

- 12.10 The NPPF requires local authorities to demonstrate that they are meeting the full, objectively assessed needs for housing providing that this is consistent with the policies of the Framework. Key sites which are critical to housing delivery should be identified alongside an annual supply of ‘deliverable’ sites to provide a five-year supply of housing measured against the local authority’s housing requirement. Local authorities are also required to ensure choice and competition in the housing market. A supply of specific, ‘developable’ housing sites or broad locations for growth, for years 6-10, should also be identified and, where possible, for years 11-15.

## Housing Needs

- 12.11 The government's standard methodology for calculating housing needs provides a key piece of evidence for the Local Plan. This is based on the:
- Projected household growth over the 2018 over the 2019-29 period based on the 2014-based Household Projections; and
  - An affordability adjustment based on the median house price to workplace-based earnings ratio published by ONS for 2018.
- Crawley's total annual housing need requirement, based on the Standard Method, is 752 dwellings per year.

### **MHCLG Standard Method Housing Need Calculation**

	Crawley
Households 2019	47,386
Households 2029	53,083
Change in Households	5,697
Per Annum Change	570
Affordability Ratio (2018)	9.11
Affordability Uplift to Household Growth	32%
Total Need (dwellings per annum)	752

### Northern West Sussex Strategic Housing Market Assessment

- 12.12 The Northern West Sussex Strategic Housing Market Assessment (SHMA) is currently being updated. This will review and refresh the evidence of the existing SHMA studies including:

- Northern West Sussex Strategic Housing Market Assessment (GVA Grimley, 2009)
- Northern West Sussex SHMA Update (GVA Grimley, 2012)
- Affordable Housing Needs Model Update (Chilmark Consulting, 2014)
- Objective Assessment of Crawley's Housing & Employment Needs (Chilmark Consulting, 2015)
- Crawley Borough: OAN Update report (Chilmark Consulting, 2015)
- Market Housing Mix Study (Chilmark Consulting, 2016)
- Starter Homes Needs and Implications (Chilmark Consulting, 2016).

- 12.13 The updated study will take into account the latest data (including the Standard Method for calculating housing needs) and the latest national policy in relation to Crawley borough and Horsham district. In particular, it will assess local housing needs and identify the needs of particular groups within the population including:
- Those who require affordable housing (including the new widened definition of affordable housing, established by the NPPF glossary);
  - Families with children;
  - Older people;
  - Students;
  - People with disabilities;
  - Service families;
  - People who rent their homes; and
  - People wishing to commission or build their own homes.

### **Housing Land Supply:**

- 12.14 Local authorities are encouraged to deliver a wide range of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. In doing so, planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (i.e. families, elderly, people with disabilities).

- 12.15 Using a flexible approach, empty housing and buildings should be brought back into residential use and where appropriate, powers of compulsory purchase used more widely. Planning policies should avoid the long term protection of sites and land allocations should be regularly reviewed. Proposals for mixed tenure residential development should generally be approved where there is an identified need for additional housing provided there are no reasons why development would be inappropriate.
- 12.16 Crawley's development as a series of comprehensive neighbourhoods, many of which have also accommodated a significant amount of infill housing in the last decade, means that the capacity of the built up area to accommodate further housing is limited. The planned areas of open space (both formal and informal) within the neighbourhoods are clearly highly valued by local residents for their amenity and recreational value. The tight relationship between the Built-Up Area Boundary and the borough's administrative boundary further limits capacity. The need to safeguard land for a potential second runway at Gatwick Airport, together with the noise contours associated with both a single and potential two runway scenario, further limits the potential for additional housing in the northern parts of the borough. However, if any of this land is released from safeguarding and/or threat of future aircraft noise following a decision on the location of new runway capacity, then opportunities for housing in this area will be explored. Areas on the periphery of Crawley, both within and outside the borough boundary, will continue to be assessed in partnership with the adjoining authorities.
- 12.17 As the land within Crawley is constrained, it is anticipated that the adjoining authorities will be asked to meet 60% of Crawley's housing need. However, this is predominantly in the form of market housing, where the market has choice. Duty to Cooperate discussions will include reference to the need to address meeting Crawley's critical affordable housing need, and in particular where developments are close to Crawley's boundaries, although this is unlikely to meet Crawley's full unmet affordable need. This places a greater emphasis on the need to secure affordable housing from those schemes within the borough, whereby council's 40% affordable requirement achieves significantly less if also accounting for the out of borough housing provision. Therefore, the council intends to robustly defend its affordable housing policy on residential developments within the borough.

#### Crawley's Strategic Housing Land Availability Assessment

- 12.18 To determine a realistic assumption for the quantum of housing land supply within the borough, a Strategic Housing Land Availability Assessment (SHLAA) has been undertaken, and forms part of the evidence base for the Local Plan. The primary role of the SHLAA is:
- The identification of sites potentially suitable for housing development;
  - An assessment of the housing potential and the capacity of these sites;
  - An assessment of their suitability, availability and achievability; and
  - An assessment of the likely timeframe for development of these sites.
- The SHLAA does not determine whether a site should be progressed through the Local Plan process as a housing allocation, nor does it automatically mean that planning permission is certain. It merely carries out an assessment of sites that could be suitable for housing development, and whether and when such sites could be developed.
- 12.19 Taking into account the suitability, availability, achievability and deliverability of housing sites within the borough, the draft SHLAA has identified a current housing land supply which provides a total of 5,713 net dwellings including windfalls<sup>37</sup>; 4,806

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<sup>37</sup> Figure is based on the period as shown within the full Housing Trajectory (1 June 2019) to the end of the Plan period: 2035.

of which are anticipated to be delivered over the Plan period (i.e. excluding those built during the financial year 2019/20). As part of this consultation, a Call for Sites is being undertaken, during which landowners and developers are invited to promote their sites for consideration for housing development. These sites will be included in the updated SHLAA and assessed against the established criteria. Those sites which are considered to be suitable, and deliverable or developable will be included in the Housing Trajectory associated with the final draft Local Plan for its Submission Publication stage.

- 12.20 An economic viability assessment of SHLAA sites that form the supply-led housing figure over the Plan period will be undertaken following the close of this consultation period and the call for sites.

#### Crawley's Windfall Allowance

- 12.21 The NPPF states that local planning authorities can make an allowance for windfall sites in the housing land supply, if compelling evidence is put forward that such sites have and will consistently become available. This allowance should be realistic, having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates, and expected trends. It should not include residential gardens.
- 12.22 It is anticipated that a total of 825 dwellings (at a rate of 55 dwellings per annum) will come forward through windfall sites in the Plan period as detailed in the council's Housing Trajectory.

#### **Housing for Older People:**

- 12.23 Although Crawley has a greater proportion of younger people than the rest of the south east, with 60% of its population under 45 years of age, the need to provide housing for older people is an increasingly important issue for Crawley, with 13% of the population aged over 65<sup>38</sup>. The number of people aged 65 and over has been increasing more quickly than other age groups; with projected growth in this age group predicted to increase by 55%, over the 20 year period to 2039, and accounting for 61% of the total projected change.
- 12.24 Housing elderly people, and meeting their needs through either support or care, is a complex matter. Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. New dwellings, as set out in Policy CD10, should be designed to accessibility standards which allow for future adaptation as the circumstances of the occupiers change, allowing for longer supported independent living.
- 12.25 Providing suitable and alternative housing for older people to move to, can free up houses that are under occupied. New housing built to more modern standards of sustainability is also attractive to older people as this offers lower maintenance and running costs. While housing for older people may require special consideration with regards to design, proximity and security, it is usually considered to be the least intrusive form of new housing development, with a lower impact on traffic, often resulting in a reduced parking requirement, and is thereby more readily accepted by existing local communities. For this reason, provided the densities of any proposals ensure the capacity of the site is maximised, any site considered appropriate for housing development would be positively considered for older people's accommodation through the decision-making process, where this also offers to meet the required affordable housing and affordable care needs (for both C2 and C3 Use Class development).

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<sup>38</sup> 2016-based subnational population projections (May 2018) ONS

12.26 As Care Home stock forms a very specific part of the housing needs market, it is considered this falls within the definition set out in the CBLP for 'Infrastructure' which confirms that: "infrastructure includes a wide range of services and facilities such as"... "affordable housing"... "health, social infrastructure, community facilities"... Policy IN1: Infrastructure Provision, therefore, applies in relation to the protection of existing Care Home facilities. Under this Policy the loss of such provision through the redevelopment of sites for alternative uses would be prevented unless an equivalent replacement or improvement is provided, or there is sufficient alternative offer in the area.

### **Gypsy, Traveller and Travelling Showpeople:**

- 12.27 The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2013) identified a need to find a reserve site suitable for accommodating ten Gypsy and Traveller pitches to meet potential accommodation needs arising from the existing community currently living within Crawley over the whole Plan period.
- 12.28 The assessment identified approximately 30 Gypsy, Traveller and Travelling Showpeople households living within Crawley; with 77 individuals identifying themselves as a 'White Gypsy or Irish Traveller' within the 2011 Census.
- 12.29 The completed questionnaires identified a demand for pitches, particularly through:
- the aspiration for Gypsy and Traveller children to live on a pitch;
  - desire to move out of their current bricks and mortar accommodation owing to preference; and
  - the anticipation of new family formations expected to arise from the existing households within Crawley.
- 12.30 It is considered that none of the participants in bricks and mortar accommodation demonstrated an immediate 'need' in terms of having a proven psychological aversion to bricks and mortar accommodation. However, a growth rate of 3% has been applied to the number of households currently living within Crawley for the purposes of estimating the potential future need which may arise from the current population over the Plan period (beyond the first five years). This resulted in a Local Plan need for a reserve site suitable for accommodating up to ten Gypsy and Traveller pitches.
- 12.31 None of the surveyed Gypsy and Travellers indicated that they owned land which they wished to be considered for a Gypsy and Traveller site.
- 12.32 The borough is heavily constrained by its administrative boundaries, which in most parts of the borough do not extend significantly beyond the Built-Up Area. The presence of Gatwick Airport also renders a significant amount of land in the north of the borough unsuitable for residential development (particularly Gypsy and Traveller accommodation) due to noise constraints; and other areas of land are constrained by flood risk. These factors limit the opportunities for providing a suitable site for permanent caravan accommodation but a possible location for a reserve site has been identified.

### **Housing Chapter Consultation Questions:**

- What types of housing and accommodation would you like to see more of in Crawley?
- Which groups in particular are poorly catered for by the available housing supply in Crawley?
- What types of housing should be prioritised in new developments over the period 2020-35?
- Where do you think new housing should be built over the period 2020-35?

→ If a new neighbourhood is built just outside Crawley's boundaries, what should it include?

## Local Plan Policies

### Housing Provision

- 12.33 The Local Plan provides a supply of housing sites to support delivery towards meeting the needs of present and future generations, whilst reflecting the physical constraints of the borough and the other policy objectives within this Plan.
- 12.34 These constraints include Local Green Space, designated heritage assets (Listed Buildings, Conservation Areas and Scheduled Ancient Monuments), sites of nature conservation importance, ancient woodland, structural landscaping, airport safeguarding/aircraft noise, and open space and floodplains. These constraints, together with the tight relationship between the Built-Up Area Boundary and the borough's administrative boundary, significantly limit capacity. The exception to this are the potential opportunities which may be found for higher density schemes within a greater mixed use town centre.
- 12.35 It is, therefore, recognised that continued cross-boundary working to understand the nature of the wider housing market area is essential to ensure that housing needs are being met in an appropriate and functional manner. There is already a long-established means of working through numerous joint evidence base documents, a joint Development Plan Document for the West of Bewbush neighbourhood (with Horsham District Council), and the Gatwick Diamond Local Strategic Statement and Memorandum of Understanding.

### Strategic Policy H1: Housing Provision

The council will positively consider proposals for the provision of housing to meet local housing needs, taking a pro-active approach to identifying suitable sites for housing development and working to overcome constraints wherever possible, whilst ensuring against detrimental town-cramming or unacceptable impacts on the planned character of the existing neighbourhoods or on residential amenity.

All reasonable opportunities will be considered including: brownfield sites; surplus green space; town centre living; and opportunities on the edge of Crawley, where these are consistent with the other policies and proposals in this Local Plan and the principle of sustainable development.

The Local Plan makes provision for the development of a minimum of 4,806 net dwellings in the borough in the period 2020 to 2035<sup>39</sup>.

The Plan will deliver an average of 451 dwellings per annum (dpa) until 2024/25. Thereafter an average of 255dpa will be delivered between 2025/26 and 2034/35.

There will be a remaining unmet housing need, of approximately 6,475 dwellings, arising from Crawley over the Plan period. 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 extensions to Crawley.

<sup>39</sup> This includes the additional 5% buffer within Years 1-5 as required by paragraph 47 of the National Planning Policy Framework as detailed in the council's Housing Trajectory, 1 April 2015

### **Reasoned Justification**

- 12.36 *The housing figure identified in Policy H1 represents a ‘supply-led’ requirement, and reflects the compact nature of the borough, its limited land availability and significant environmental, airport noise and safeguarding constraints.*
- 12.37 *The majority of housing delivery (against the borough’s housing requirement) will take place in the Years 1–5 of the Plan period, beyond which capacity, and therefore identified delivery, is expected to be significantly lower (as illustrated in the Housing Trajectory and Housing Implementation Plan). This is primarily due to the development of Crawley’s new neighbourhood of at least 1,465 dwellings, Forge Wood, which forms a major part of housing delivery in the first ten years of the Plan period and is the last remaining large area of relatively unconstrained land in the borough. The varied nature of housing land supply (and associated housing delivery) over the Plan period makes it difficult to identify an annual housing delivery target within Policy H1. However, whilst an annualised average delivery of 320 dwellings per annum is anticipated, a stepped trajectory is reflected in the Policy to account for the higher delivery in the early Plan period and the lower anticipated levels towards the end. On this basis, monitoring of the housing delivery within the borough will reflect the planned approach taken, rather than suggesting “over delivery” followed by “under delivery”.*
- 12.38 *The council has endeavoured to ensure that every opportunity for residential development within the borough has been fully considered through the Local Plan process. Additional sites can be put forward as part of this consultation, through the council’s “Call for Sites”. The council’s Strategic Housing Land Availability Assessment will be updated following this consultation and will reassess all sites to consider those which are considered to be suitable for development and either ‘deliverable’ in Years 1–5 or ‘developable’ in Years 6–10 or 11–15. The SHLAA also identifies a number of sites which are considered suitable for residential development but unlikely to come forward due to factors such as ownership and viability, and these sites cannot reasonably be expected to count towards housing land supply. However, the council will continue to work proactively with landowners to address the key barriers to bringing these sites forward. The supply figure should therefore be considered as a minimum.*
- 12.39 *The constrained nature of Crawley’s land supply means that approximately 43% of the borough’s predicted demographic housing need over the 15 years 2020 – 2035 can be met within the borough boundaries. The remaining unmet housing need from Crawley, of 6,475<sup>40</sup>, will need to be considered through Duty to Cooperate discussions as part of the Local Plan Reviews for the other authorities within the Housing Market Area (Horsham, Mid Sussex and Reigate and Banstead). Currently, the adopted Local Plans for Horsham and Mid Sussex districts are anticipated to provide an additional 3,150 dwellings<sup>41</sup>, above their objectively assessed housing needs, in order to meet Crawley’s unmet need. However, through the Local Plan Reviews this figure is likely to change, particularly as the Standard Method increases their own housing requirements to above their current adopted Plan commitments (see paragraph 2.29).*
- 12.40 *Opportunities for urban extensions immediately adjoining Crawley’s borough boundaries will continue to be explored with Crawley’s neighbouring authorities. Also, if safeguarding is lifted and a decision made to locate additional runway capacity elsewhere in the country, opportunities to the north of Langley Green and Forge*

<sup>40</sup> 11,281 dwellings housing need (Standard Method 752 x 15 years) – 4,806 dwellings total supply 2020 – 2035 (CBC Housing Trajectory, June 2019) = 6,475 dwellings unmet need

<sup>41</sup> 1,500 dwellings to be provided in Mid Sussex district (between April 2024 and March 2031: Policies DP4 and DP5, Mid Sussex District Plan 2014 – 2031, 2018) and 1,650 dwellings to be provided in Horsham district (between April 2020 and March 2031, Horsham District Planning Framework, 2015)

*Wood will be fully assessed for additional housing provision. Efforts will be made to include affordable housing provision to meet Crawley's needs outside of the borough, wherever possible, particularly if these are close to the town or borough boundary.*

#### **Housing Monitoring and Delivery**

- 12.41 *Housing delivery will be continually monitored and reported at least annually through the Authority's Monitoring Report. Delivery will be assessed against the expectations of the Local Plan Housing Trajectory, and against the annually updated Housing Trajectory. The council will also be monitored through the government's national Housing Delivery Test. This will be based on the annualised average housing target set by the Local Plan (where the Plan remains up-to-date) over a rolling three-year period preceding. As the anticipated higher delivery in the first part of the Plan period would not be considered as part of the Housing Delivery Test towards the end of the Plan period, a stepped target is established in Policy H1, to ensure the borough is measured against the realistic position of a constrained and reducing land supply.*
- 12.42 *Whilst the scope for the council to deliver private development, once planning permission is granted, is limited, the council has a history of intervening and supporting delivery of stalled development. Should delivery rates fall below 95% of the housing requirement, through the Housing Delivery Test, the council will be required to prepare an Action Plan. This will assess the causes of under-delivery and identify actions to increase delivery in future years. However, even where delivery is exceeding or meeting the Housing Delivery Test, as part of the council's monitoring the implementation of policies, the progress of key development sites identified by the Plan will be assessed and, where these are not coming forward in line with the anticipated Housing Trajectory timescales or delivery rates, the council will seek to identify the causes and whether there is scope for support or intervention.*
- 12.43 *However, early delivery will not override the need for a scheme to be policy compliant and meet the expectations of the Local Plan as a whole for good design and high quality schemes. Furthermore, the limited land supply of the borough makes on-site affordable housing delivery imperative, and viability claims suggesting this is slowing delivery will not automatically result in a reduction of the council's expectations for this to be provided.*

#### **Policy H1: Housing Provision Consultation Questions:**

- Is the approach set out in Policy H1 consistent with the following national policy requirements, outlined in the National Planning Policy Framework, para. 11 (2019):
- a) plans should positively seek opportunities to meet the development needs of their areas, and be sufficiently flexible to adapt to rapid change;
  - b) strategic policies should, as a minimum, provide for objectively assessed need for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
    - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
    - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- Is this policy likely to support the objective of maintaining housing delivery?
- What other provisions would benefit the objective of maintaining housing delivery?

#### **Key Housing Sites**

- 12.44 New housing is considered integral to the creation of sustainable neighbourhoods in Crawley. The council will ensure that new housing opportunities are identified according to both land availability and the characteristics of individual

neighbourhoods. This approach will respect the town's unique neighbourhood development and design principles and preserve the most valued of the town's environmental features such as open space and strategic landscaping.

- 12.45 Although there is limited housing at present, the town centre represents a highly sustainable location for residential development with immediate access to facilities, services, and transport links. Residential development also adds vitality to the town centre, bringing life into the centre and supporting the evening economy. Housing development is, therefore, encouraged in the town centre, either as mixed use or wholly residential schemes or as conversions of the upper floors of existing retail premises.

## Strategic Policy H2: Key Housing Sites

The following sites are identified as key housing sites and allocated on the Local Plan Map. These are considered to be critical to the delivery of future housing in Crawley and are identified as being 'deliverable' within the first five years of the Plan (2015/16 – 2019/20) or 'developable' in years 6–10 (2020/21 – 2024/25)<sup>42</sup>. To ensure the delivery of the overall minimum housing figure set out in Policy H1, as supported by the Housing Trajectory, indicative capacity figures for each site are shown in brackets below.

### Deliverable

- Forge Wood, Pound Hill (1,465 dwellings outstanding)
- Land adjacent to Desmond Anderson, Tilgate (100 dwellings)
- 15 – 29 Broadway Upper Floors, Northgate (78 dwellings)
- Kilnmead Car Park, Northgate (37 dwellings)
- Zurich House, East Park, Southgate (56 dwellings)
- Goffs Park Depot, Southgate (44 dwellings)
- Former TSB site, Russell Way, Three Bridges (40 dwellings)
- Steers Lane (75 dwellings)
- Upper Floors, 7 – 13 The Broadway & 1 - 3 Queens Square, Northgate, Crawley (25 dwellings)
- Stoner House, Kilnmead, Northgate (111 dwellings)
- Sutherland House (Eastern Section), Russell Way, Three Bridges, Crawley (50 dwellings)
- EDF Building, Russell Way, Three Bridges (42 dwellings)
- Shaw House, Pegler Way, West Green (26 dwellings)
- Longley Building, Southgate (48 dwellings)

### Developable

- Land to the southeast of Heathy Farm, Balcombe Road Forge Wood (75 dwellings)

### Housing and Neighbourhood Facilities Site

- The Imperial, Broadfield Barton (deliverable), 19 dwellings. Development of this site must include a drinking establishment (A4 use) and two retail (A1 use) units.

### Town Centre Key Opportunity Sites (1,200 net dwellings); comprising:

- Telford Place, Three Bridges (deliverable)
- Crawley Station and Car Parks (deliverable)
- County Buildings (deliverable)
- Land North of the Boulevard (deliverable)
- Crawley College (developable)
- Cross Keys (deliverable)

<sup>42</sup> Crawley Borough Council Housing Trajectory, 1 April 2015

### Housing and Open Space Sites

- Tinsley Lane, Three Bridges (deliverable) 120 dwellings, mixed use recreation/residential. Development of this site must include:
  - i. the replacement of Oakwood Football Club;
  - ii. senior football pitch and facilities;
  - iii. a junior 3G football pitch;
  - iv. community use arrangements for the sports pitch facilities;
  - v. enhancement and management for public access of Summersvere Woods;
  - vi. on-site publicly accessible play space and amenity greenspace.
  - vii. Consideration should also be given to the provision of allotments.

Development must also be carefully planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent safeguarded minerals site.

Full details of the requirements relating to this site are set out in the Tinsley Lane Development Brief.

- Breezehurst Drive Playing Fields, Bewbush (deliverable) 65 dwellings, mixed use recreation/residential. Development of this site must include:
  - i. the retention of good quality pitch provision to the south of the pavilion; provision of enhanced pitch drainage off-site; and
  - ii. new or retained provision of changing facilities to be directed towards Skelmersdale Walk Playing Fields or other suitably located provision to meet future fluctuations in demand for pitch sports.
  - iii. Consideration should also be given to the provision of allotments off-site should demand from residents exist.

These requirements are set out in full in the Breezehurst Drive Playing Fields Development Brief.

- Henty Close, Bewbush (deliverable) 24 dwellings. Development of this site must:
  - i. provide a replacement play area of equivalent or better quantity and quality in a suitable location.

### Housing, Biodiversity and Heritage Site

- Land east of Balcombe Road/Street Hill, Pound Hill (deliverable) 15 dwellings. The design and layout of the development of this site must:
  - i. respect its setting outside the built up area and the rural character of the Worth Conservation Area;
  - ii. concentrate the residential element and associated infrastructure towards the least sensitive areas, where possible, and to be located within the southern section of the housing, biodiversity and heritage site;
  - iii. reflect, enhance and ensure no significant harm to the locally designated historic parkland;
  - iv. allow a suitable unbuilt margin around the archaeologically sensitive Moat;
  - v. limit harm to the species-rich meadow grassland which contributes to the Site of Nature Conservation Importance;
  - vi. maintain the woodland vegetation barrier between the development and the church, to retain the historic significance of the context of Worth Church; and
  - vii. be accompanied by a long-term commitment to the ecological enhancement and proper management of the remainder of the SNCI (excluding the ponds and woodland in the centre and north-east in separate ownership) for the benefit of biodiversity.

Detailed ecological and archaeological assessments must be carried out and adequate mitigation and compensation measures provided to offset any harm caused to the site's important assets.

These requirements will be set out in full in a Development Brief.

#### Housing for Older People

- Oakhurst Grange, Southgate (deliverable) 55 dwellings as residential Class C3 use or up to 120 residential rooms as Class C2 (Residential Home) use. Development of this site 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.

#### Broad Locations

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 120 and 215 net dwellings respectively.

### **Reasoned Justification**

- 12.46 *This Policy demonstrates how the Local Plan makes provision for the delivery of a minimum of 4,800 net additional dwellings in the borough between 2020 and 2035. This includes the 5% additional buffer required within the first five years of the Plan to ensure greater competition and choice in the supply of housing land. The council has undertaken a Strategic Housing Land Availability Assessment (SHLAA) which identifies land that has the potential for residential development in the borough. The results of the SHLAA are used to demonstrate an annual five-year housing land supply and to identify sites that are likely to come forward for residential development over the lifetime of the Local Plan.*
- 12.47 *Through the SHLAA process, the council has been able to identify a number of deliverable and developable sites to meet the housing target for the Local Plan period. In this regard, the council can demonstrate that it can satisfy the government's requirement to identify specific 'deliverable' sites to meet the first five years housing supply and specific 'developable' sites or broad locations for years 6–10 and 11-15. It is considered that the additional 5% buffer requirement is capable of being delivered in the period 2020/21 – 2025/26.*
- 12.48 *A number of sites within the Town Centre boundary have been identified as Key Opportunity Sites in Policy H2. These sites have the capacity to deliver a minimum of 1,200 net dwellings cumulatively through residential or mixed-use development. Proposals for mixed-use (including non-residential) development on these sites will be considered favourably providing they can demonstrate the delivery of wider vitality and viability benefits to the Town Centre, and that their development would not undermine the delivery of a minimum of 1,200 net dwellings in the period 2020/21 to 2030/31 (Years 1-10 of the Plan) and 4,800 net dwellings in the borough in the period 2020-2035 (as defined in Policy TC3). The council's delivery against these targets will be subject to ongoing monitoring and identified in the Authority's Monitoring Report. Residential proposals coming forward within the Town Centre boundary must also adhere to the location-specific requirements set out in Policies TC4: Active Frontages and H3d: Housing Typologies Town Centre Residential Sites, in addition to satisfying the other general policies in the Plan.*
- 12.49 *In determining how far Crawley can meet its own housing needs, detailed assessments have been carried out to ensure the town balances competing land uses in a sustainable manner. This includes landscape character assessments, open space and economic growth assessments alongside the Urban Capacity Study and Strategic Housing Land Availability Assessments. Two sites have been identified and allocated on the Local Plan Map for 'Housing and Open Space'. These are Tinsley Lane, Three Bridges (Deliverable) and Breezehurst Drive, Bewbush (Developable).*

*The layout of these sites has been considered in more detail to ensure they can deliver the quantum of housing within the constraints identified by the open space study for meeting recreational open space needs<sup>43</sup>. A development brief will be prepared for each of these sites to ensure their development adheres to the requirements of the Open Space, Sport and Recreation Study and Playing Pitch Study; critical elements of these are set out in the Policy. For Tinsley Lane this will involve consideration into the needs of the existing football club; whilst for Breezehurst Drive sports pitch improvements will be required both on-site and off-site. The balance between housing and on-site open space will be determined through the design and layout of a detailed scheme.*

- 12.50 *A third open space site (Bewbush West Playing Fields) has also been identified as having some potential for delivering a degree of housing. However, further analysis has indicated this should be in the form of a small housing site to the south of the playing fields (west of Henty Close) to enable improved linkages and enhanced urban design and principles of designing out crime, into the new Kilnwood Vale neighbourhood at the point of the proposed bus, pedestrian and cycle connection. This would result in the need to replace the loss of a small play area, but would include the retention of the two sports pitches and a pavilion associated with the playing fields.*
- 12.51 *Tinsley Lane is located in close proximity to Crawley Goods Yard which is a safeguarded minerals site. Development must be carefully planned, laid out and designed to minimise potential future conflicts and constraints on its important minerals function.*
- 12.52 *Land east of Balcombe Road/Street Hill has a number of heritage and environmental constraints which must be carefully considered and addressed through the design and layout of a development scheme. These include:*
- i. Forming part of the historic countryside setting of the Grade I listed Church;*
  - ii. Its allocation within the Worth Conservation Area;*
  - iii. Its Site of Nature Conservation Importance designation (with species-rich meadow grassland as its important ecological attribute);*
  - iv. Containing an archaeological sensitive asset: the Moat;*
  - v. Forming part of an Historic Park and Garden;*
  - vi. Being located outside the Built-Up Area Boundary of the town.*

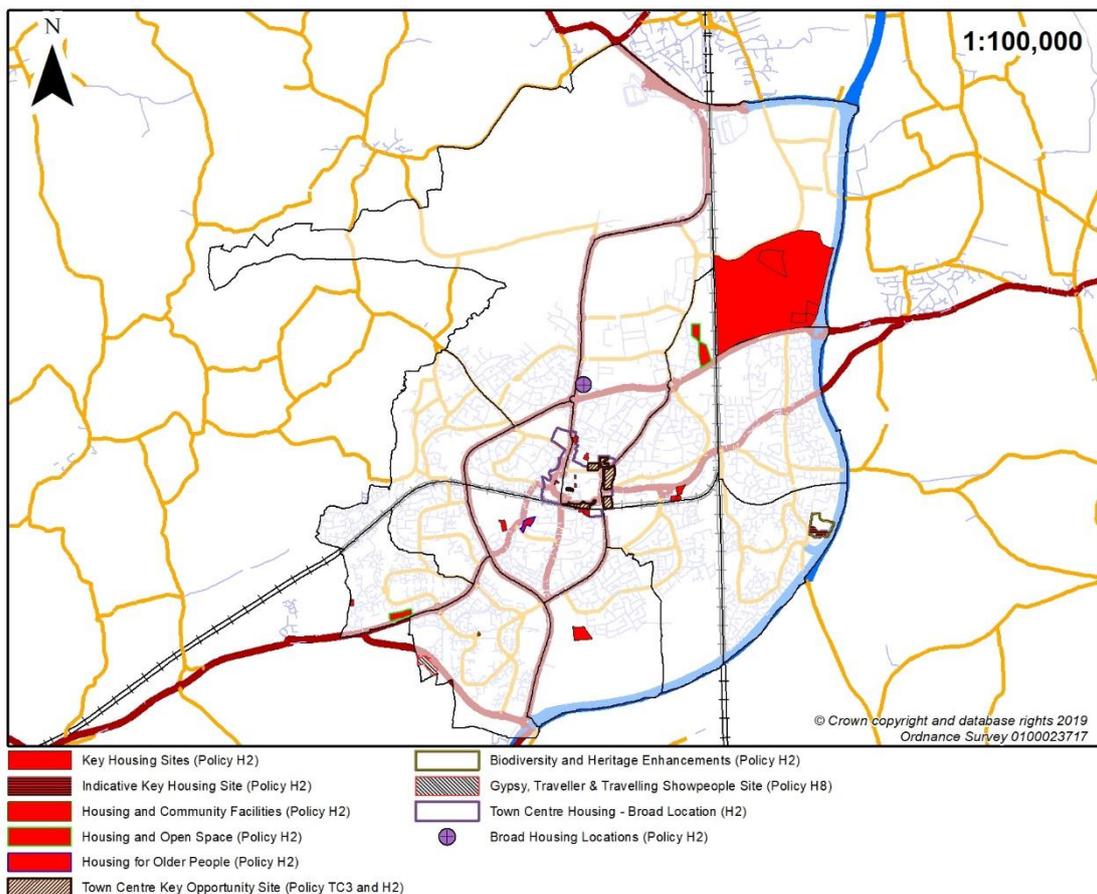
*To ensure an appropriate balance between the need for housing and the important heritage and environmental assets and characteristics of the site, a maximum capacity of 15 dwellings is considered likely to be appropriate. Harm to the character of the Worth Conservation Area must be minimised by a scale and design of development which respects the rural nature of the Conservation Area, as a loose-knit low density layout clearly distinct from the suburban character of Maidenbower. The potential impact of the development and long-term degradation of the valuable habitat on the site and the harm to the Moat can be mitigated against through the appropriate high quality enhancement of the remainder of the site. Therefore, an unbuilt margin around the archaeological asset and its appropriate management must be retained and an appropriate scheme for its future management, and that of the two-thirds of the SNCI not affected by development and controlled by the landowner, will be required as part of the development. To protect the valuable nature of the site, measures must be incorporated within the development, and management proposals, to control the pressures created from the development on the remaining ecological assets, including informal recreation, dog walking and fly tipping. Due to the complex character and assets associated with this site, it is shown*

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<sup>43</sup> In accordance with paragraphs 73 and 74 of National Planning Policy Framework (2012) DCLG

on the Local Plan Map as a housing, biodiversity and heritage site, with the area most likely to be suitable for housing indicated within the southern part of the site.

- 12.53 Oakhurst Grange is an existing residential care facility, which is currently vacant. As a secluded and discrete site, the particular characteristics of the site and its location in close proximity to Crawley Hospital support its continued contribution towards meeting the local housing needs of older people. Appropriate development of this site could be as an Extra-Care or Residential Care facility; or as a bespoke development which may incorporate mixed units designed to meet the needs of older people; or for housing designed to provide more general accommodation for older people, and to contribute to the overarching principle of places to live that assist older people to retain their independence for as long as possible. This may include: accessible mainstream housing such as bungalows and step-free apartments designed and built to wheelchair adaptable access standards; sheltered or extra care housing; and/or retirement housing.



- 12.54 Given that the council is required to identify 15 years housing supply, it is considered that there is additional housing potential in the Town Centre and Land East of London Road that will arise in the mid to latter part of the Plan period. These could contribute to housing land supply from Year 6 onwards (i.e. from 2026/27 to 2034/35) and are identified as broad locations for medium to long-term residential development. This is in accordance with the overall spatial approach as set out in the Local Plan Vision to 2035, by helping to minimise the impact on important biodiversity and landscape features and offers the greatest scope to reduce the need to travel by private vehicle because of the proximity to existing services, jobs and public transport.

## Policy H2: Key Housing Sites Consultation Questions:

- Are all of the sites identified in this Policy suitable for residential development?
- Are there some sites classed as 'deliverable' which should be counted as merely 'developable', and vice versa?
- Is the type and amount of development suggested for each of the identified sites appropriate?
- Are the allocations appropriate in respect of the non-housing development requirements which are detailed?

## Housing Typologies

12.55 In order to support Local Plan Policy H1 and seeking to maximise the delivery of new dwellings to meet as far as possible Crawley's emerging housing needs, the following land typologies have been identified for their potential suitability for housing development:

- Estate Regeneration;
- Town centre;
- Densification;
- Upward extensions;
- Small sites;
- Conversions from commercial/non-residential uses;
- Open spaces;
- Urban Extensions on/outside the borough boundaries.
- Infill opportunities;
- Garden sites;

## Strategic Policy H3: Housing Typologies

Housing development in Crawley will be supported where it meets the following criteria, along with the specific requirements set out associated with each of the housing typology sub-policies below (H3a-H3g inclusive), and where it is in conformity with the other policies and requirements of this Local Plan:

- i. The principles of Good Urban Design, set out in Policy CD2, are followed;
- ii. The principles in relation to Local Character and Design, set out in Policy CD3, are followed;
- iii. The presumption in favour of sustainable land use, with particular reference to Policies CD4(a) and (b) is followed;
- iv. Local Design Standards and wider borough standards in relation to landscape and urban form is followed (see Policy CD5);
- v. A good standard of amenity for all existing and future occupants of land and buildings is provided or retained, including maintaining privacy and preventing overlooking; and avoiding dominance or overshadowing.
- vi. The scheme would not result in an unacceptable impact on car parking for existing and new residents and occupiers.
- vii. The scheme meets the internal and external space standards expected by the Local Plan, including being accessible and adaptable, and proposals ensure that rooms within buildings receive adequate daylight.

## Reasoned Justification

12.56 *Proposed residential development outside of the Built-Up Area Boundary must address the general requirements set out in Policy LC5, as well as those which relate to the character area or edge in which the site is located.*

### Policy H3: Housing Typologies Consultation Questions:

- Is the list of housing typologies correct? Are there additional types of land which are not included which should be reflected in this policy approach?
- Are any of the housing typologies suggested incorrect and should be removed for any reason? What are these reasons?
- Are any types of sites preferable to pursue over others? Why?
- What problems do you think may be associated with the development of particular types of sites?
- What opportunities do you think may be associated with the development of particular types of sites?
- What are the key considerations which should be taken into account when assessing the suitability of a site for housing development which falls into any of these categories?
- Are any of these key considerations bespoke to particular types of sites, or are they relevant to all types of housing development on all types of sites within or adjacent to Crawley?
- Are there any types of sites which should be restricted to meeting a particular type of housing need only?

### Estate Regeneration

- 12.57 In Crawley, due to the planned Twentieth Century New Town history, a significant proportion of housing was provided at a similar time, between the 1950s and 1990s. This may mean that opportunities for estate regeneration could arise as part of the promotion of improvements to housing stock, particularly where the construction methods of certain types of properties are causing maintenance problems or have poor energy efficiency. It can be a successful way to improve the quality of housing and increase numbers in an area whilst at the same time improving the local environment, but is also potentially disruptive to existing residents. Therefore, this would need careful planning. Local Authorities are encouraged by the NPPF<sup>44</sup> to consider the social, economic and environmental benefits of estate regeneration.
- 12.58 At this stage, there are none planned in Crawley. Should this approach be progressed ahead of the next Local Plan Review, there are a number of specific planning policy considerations to be taken into account in early scoping and design.

### Strategic Policy H3a: Estate Regeneration

Estate Regeneration in Crawley will be supported where it meets the criteria set out in Policy H3 above, along with the specific requirements set out associated below, and where it is in conformity with the other policies and requirements of this Local Plan.

#### Estate Regeneration

Housing development as part of Estate Regeneration will be supported where this is in conformity with the other policies and requirements of this Local Plan, and where it can be shown that:

- i. The proposals are supported by, and in conformity with, an agreed comprehensive Masterplan for the new and remaining areas, including detailed phasing and relocation proposals;

<sup>44</sup> National Planning Policy Framework, Para. 93 (2019) MHCLG

- ii. The proposals will provide high quality new development in keeping with the character of the neighbourhood, maximising the efficient use of land whilst protecting residential amenity and providing appropriate open space;
- iii. Local communities and affected individuals have been engaged extensively, positively and with genuine opportunities to participate and are supportive of the proposals.

### **Reasoned Justification**

12.59 *The policy is consistent with the requirement in the National Planning Policy Framework that planning policies ‘should consider the social, economic and environmental benefits of estate regeneration’ and that ‘Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard’<sup>45</sup>.*

### **Policy H3a: Estate Regeneration Consultation Questions:**

- Is it sufficiently clear what this policy means by ‘Estate Regeneration’?
- Do you consider Estate Regeneration in certain parts of our neighbourhoods may be an appropriate approach to housing delivery in Crawley?
- Are there any areas which you think may benefit from this approach?

### **Densification, Infill Opportunities and Small Sites**

12.60 Within the urban neighbourhoods, opportunities for densification through infill and small sites may arise as part of the windfall housing delivery anticipated through the Housing Trajectory. The Policy below sets some general principles which should be considered alongside Policy CD2 and any Area-Wide Character and Design Assessments and local design standards related to Policy CD5 associated with the location of any proposals.

### **Strategic Policy H3b: Densification, Infill Opportunities and Small Sites**

Densification and development on infill and small sites in Crawley will be supported where it meets the criteria set out in Policy H3, along with the specific requirements set out below, and where it is in conformity with the other policies and requirements of this Local Plan.

#### **Densification**

Housing development through densification schemes will be supported where this is in conformity with the other policies and requirements of this Local Plan, and where it can be shown that:

- i. The site is located in a sustainable location which would be appropriate for higher densities, such as close to transport interchanges, town centre and neighbourhood centres.

#### **Small Sites**

Housing development on small urban sites will be supported where this is in conformity with the other policies and requirements of this Local Plan, and where it can be shown that:

- ii. It would not unduly restrict the development potential of adjoining land, nor prejudice the proper planning and phasing of development over a wider area;

<sup>45</sup> National Planning Policy Framework, Para. 93 (2019) MHCLG.

- iii. It maximises the potential capacity of the site, taking on board the character of the site and its context, and uses the land efficiently, through a careful and high quality design-led approach appropriate to the character of the neighbourhood;
- iv. Ancient woodland or aged trees would not be damaged or lost and an appropriate buffer 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;
- v. It is based on a thorough understanding of the immediate and wider context and is designed to respond to and enhance the existing character.

### **Infill Opportunities**

Housing development through infill opportunities will be supported where this is in conformity with the other policies and requirements of this Local Plan, and where it can be shown that:

- vi. It maximises the potential capacity of the site, taking on board the character of the site and its context, and uses the land efficiently, through a careful and high quality design-led approach;
- vii. It is based on a thorough understanding of the immediate and wider context and is designed to respond to and enhance the existing character.

### **Reasoned Justification**

12.61 *National planning guidance requires Local Planning Authorities to support development that makes efficient use of land. However, impacts on character and the importance of securing well-designed, attractive and healthy places must be considered<sup>46</sup>.*

### **Policy H3b: Densification, Infill Opportunities and Small Sites Consultation Questions:**

- Is it sufficiently clear what this policy means by 'Densification, Infill Opportunities and Small Sites'?
- Are the requirements identified in this Policy appropriate for the types of development identified above?
- Are there any further requirements which should be applied to the types of development identified above?

### **Open Spaces**

12.62 Where open space can be shown to be surplus to open space requirements or sufficient alternative new provision is to be provided, in accordance with Policy OS1, the following specific criteria must be satisfied in considering new housing development on existing open space sites (including residential garden sites).

<sup>46</sup> National Planning Policy Framework, Para. 122 d) and e) (2019) MHCLG

## Strategic Policy H3c: Open Spaces

Housing development on surplus open spaces within the Built-Up Area Boundary in Crawley will be supported where it meets the criteria in Policy H3, along with the specific requirements set out below, and where it is in conformity with the other policies and requirements of this Local Plan.

### Open Spaces

Housing development on open spaces will be supported where this is in conformity with the other policies and requirements of this Local Plan, and where it can be shown that:

- i. The site has been shown to be surplus to requirements for open space needs through the Open Space, Sport and Recreation Study or otherwise clearly meets the requirements established by Policy OS1;
- ii. Replacement and/or enhancement of open space is provided elsewhere in a suitable location to mitigate against the loss of the open space and to address the increased demand arising from the associated new population;
- iii. The urban and landscape character and environmental values of the site are outweighed by the benefits of the development and any harm mitigated and addressed, with an enhancement, through design and layout;
- iv. Mitigation measures would ensure that the scheme would not block or harm the strategic Green Infrastructure network and would be designed to provide new links to Green Infrastructure where possible and clearly result in Net Gain for biodiversity (based on up-to-date and professional ecological and arboricultural surveys);
- v. Ancient woodland or aged trees would not be damaged or lost and an appropriate buffer 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;
- vi. Flood risk will not be exacerbated elsewhere as a result of the development, and surface water drainage is maintained at greenfield runoff rate levels.

### Garden Sites

Housing development on garden sites will be supported where this is in conformity with the other policies and requirements of this Local Plan, and where it can be shown that:

- vii. It is based on a thorough understanding of the immediate and wider context and is designed to respond to and enhance the existing character;
- viii. Ancient woodland or aged trees would not be damaged or lost and an appropriate buffer 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.

### Reasoned Justification

12.63 *Policies set out in the Landscape Character and Landscaping; Open Space, Recreation and Sports; and Green Infrastructure Chapters are particularly relevant when considering applications in relation to housing on existing open space sites.*

#### Policy H3c: Open Spaces Consultation Questions:

- Is it sufficiently clear what this policy means by 'Open Spaces' and 'Garden Sites'?
- Are the requirements identified in this Policy appropriate for the types of development identified above?

→ Are there any further requirements which should be applied to the types of development identified above?

## Town Centre Residential Sites

12.64 The town centre is recognised as being a sustainable location for housing. However, this must be balanced with the need to maintain sufficient floorspace for retail, commercial and social facilities and services which should be provided in a central location. In addition, the needs of the residential population must be adequately catered for, through sufficient infrastructure provision.

### Strategic Policy H3d: Town Centre Sites

Housing development in Crawley Town Centre will be supported where it meets the criteria set out in H3, along with the specific requirements set out below, and where it is in conformity with the other policies and requirements of this Local Plan:

- i. It would not result in a net loss of employment or retail land or floorspace unless it otherwise clearly meets the full requirements of Policy EC2;
- ii. The scheme should provide active frontages on the ground floor level in accordance with Policy TC4;
- iii. The scheme should achieve the correct housing mix for the town centre, as set out in Policy H4, particularly preventing an over-supply of small dwellings, and should create a balance in tenure, including through encouraging owner-occupation, encouraging affordable tenures, and monitoring the ratio of private rented accommodation;
- iv. The development will be designed to be integrated effectively with existing businesses and community facilities and adequately addresses existing and potential noise and nuisance arising from the mix of town centre uses through suitable mitigation before the development is occupied;
- v. Cumulative infrastructure needs of the increasing residential population in the town centre are clearly identified and met, and the proposal has been justified and is adequately supported by sufficient social facilities and infrastructure located within the town centre or accessible from the development;
- vi. Where a lower car parking provision is anticipated, alternative transport proposals must be justified, agreed and implemented;
- vii. It maximises the potential capacity of the site and uses the land efficiently, through a careful and high quality design-led approach;
- viii. Cycle parking and waste/recycling storage must be adequately designed into the scheme from the start and the site will meet the requirements necessary for access, circulation and manoeuvring, loading and unloading and the collection of waste/recycling, including the servicing requirements of existing and new commercial and retail floorspace.

### Reasoned Justification

12.65 *Policies contained within the Town Centre chapter are particularly relevant when considering residential opportunities within the town centre boundary. In addition, Policies CD4a and CD4b set out policy expectations in relation to the effective use of land. The Urban Design and Town Centre SPDs also provide additional supporting guidance which should be considered when preparing schemes.*

12.66 *Policy H4 sets out the expected future housing mix from developments across the borough. However, it is recognised that the town centre provides a different offer to*

the overall requirements. Notwithstanding this, evidence<sup>47</sup> has identified concerns regarding the over-provision of smaller bedsit, one and two bed units coming forward in town centre schemes leading to a distorted market. As the town centre residential population grows, it is essential to cater for a better mix of communities. On this basis, schemes within the town centre boundary which meet the following housing mix will be considered more favourably than those which promote only the small units:

	<b>60% Market Housing Element</b>		<b>40% Affordable Housing Element</b>
	<i>Owner Occupier Market Housing</i>	<i>Private Rental Market Housing</i>	
<i>1 Bed</i>	15%	20%	25%
<i>2 Bed</i>	45%	40%	50%
<i>3 Bed</i>	35%	35%	20%
<i>4+ Bed</i>	5%	5%	5%

#### **Policy H3d: Town Centre Sites Consultation Questions:**

- Are the requirements identified in this Policy appropriate for the types of development identified above?
- Are there any further requirements which should be applied to the types of development identified above?

### **Upward Extensions**

12.67 National policy encourages Local Planning Authorities to support opportunities to use the airspace above existing residential and commercial premises for new homes, where these would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed, and can maintain safe access and egress for occupiers.

#### **Strategic Policy H3e: Upward Extensions**

Housing development through upward extensions will be supported where it meets the criteria set out in Policy H3 and is in conformity with the other policies and requirements of this Local Plan, and where it can be shown that:

- i. The proposal height, including construction cranes, has been agreed with Gatwick Airport Ltd and NATS in relation to aviation aerodrome safeguarding;
- ii. It is based on a thorough understanding of the immediate and wider context and is designed to respond to and enhance the existing character, and take into consideration the expectations set out in Policy CD4b;
- iii. It would not unduly restrict the development potential of adjoining land, nor prejudice the proper planning and phasing of development over a wider area;
- iv. It would not cause unreasonable harm to the amenity of the surrounding area by way of overshadowing, dominance or overlooking;
- v. Where a lower car parking provision is anticipated, alternative transport proposals must be justified, agreed and implemented;
- vi. The development will be designed to be integrated effectively with existing businesses and community facilities and adequately address existing and potential

<sup>47</sup> Market Housing Mix, paras 5.17-5.19, page 47 (November 2016) Chilmark Consulting: [Market Housing Mix \(November 2016\) Chilmark Consulting](#)

noise and nuisance arising from the adjoining uses through suitable mitigation before the development is occupied;

- vii. Cycle parking and waste/recycling storage must be adequately designed into the scheme from the start and the site will meet the requirements necessary for access, circulation and manoeuvring, loading and unloading and the collection of waste/recycling.

### **Reasoned Justification**

12.68 *Crawley neighbourhoods are predominantly characterised by low-rise, domestic scale developments, of two and sometimes three-storeys. In such cases, clear guidance will be provided by the Area-Wide Design Assessments. For Crawley town centre there may be more scope for upward extensions, where this is well-designed.*

12.69 *For any developments proposing an increase in height, liaison with Gatwick Airport Limited, with respect to Aerodrome Safeguarding will be essential at an early stage. This will include consideration of height of cranes and construction.*

### **Policy H3e: Upward Extensions Consultation Questions:**

- Is it sufficiently clear what this policy means by 'Upward Extensions'?
- Are the requirements identified in this Policy appropriate for the type of development identified above?
- Are there any further requirements which should be applied to the type of development identified above?

### **Conversions from Commercial/Non-Residential Uses**

12.70 National planning policy encourages the conversion of commercial properties, especially vacant or underused buildings, to residential. Commercial properties within Crawley's Main Employment Areas are not considered suitable for residential, due to the need for employment floorspace and the impacts of residential developments on commercial operations in such locations. However, the town centre may provide opportunities for some conversions to residential where this has been considered against the Policy requirements of EC1 and EC2.

### **Strategic Policy H3f: Conversions from Commercial/Non-Residential Uses**

Housing development through conversion of existing buildings from non-residential uses will be supported where it meets the criteria set out in Policy H3 and is in conformity with the other policies and requirements of this Local Plan, and where it can be shown that:

- i. It would not result in a net loss of employment or retail land or floorspace, unless it clearly meets the requirements of Policy EC2;
- ii. Where this is located within or adjacent to one of the borough's Main Employment Areas, the scheme would not result in an adverse impact on the economic role or function of the Main Employment Area, and the wider economic function of Crawley;
- iii. Where this is located within one of the borough's Neighbourhood Parades, the scheme would not adversely affect the ability of the Neighbourhood Parade to cater for the day-to-day needs of local residents;
- iv. The scheme provides active frontages at ground floor level, where the site is within the town centre or appropriate other locations;

- v. The development will be designed to be integrated effectively with existing businesses and community facilities and adequately address existing and potential noise and nuisance arising from the mix of town centre uses through suitable mitigation before the development is occupied;
- vi. Cycle parking and waste/recycling storage must be adequately designed into the scheme from the start and the site will meet the requirements necessary for access, circulation and manoeuvring, loading and unloading and the collection of waste/recycling. Where a lower car parking provision is anticipated, alternative proposals must be justified, agreed and implemented;
- vii. It maximises the potential capacity of the site and uses the land efficiently, through a careful and high quality design-led approach;
- viii. It is based on a thorough understanding of the immediate and wider context and is designed to respond to and enhance the existing character.

### **Reasoned Justification**

12.71 *Policies in the Economic Growth and Crawley Town Centre chapters apply.*

#### **Policy H3f: Conversions from Commercial/Non-Residential Uses Consultation Questions:**

- Is it sufficiently clear what this policy means by 'Conversions from Commercial/Non-residential Uses'?
- Are the requirements identified in this Policy appropriate for the types of development identified above?
- Are there any further requirements which should be applied to the types of development identified above?

### **Urban Extensions: 'At Crawley'**

12.72 In order to support Local Plan Policy H1 and seeking to maximise the delivery of new dwellings in order to meet as far as possible Crawley's emerging housing needs, the following land typologies have been identified for their potential suitability for housing development.

12.73 Over recent years, increasing numbers of houses are being built on the peripheries of Crawley's urban and administrative boundaries. Whilst, in some cases, this has been promoted through joint planning between Crawley and neighbouring authorities to come forward as comprehensive new neighbourhoods, such as Kilnwood Vale (2,650 new dwellings<sup>48</sup>), in most other cases this has come forward in piecemeal individual developments of between 30 and 600 new dwellings at a time, tacked on to the existing urban infrastructure.

12.74 The Local Plan acknowledges that other potential urban extensions to Crawley that are outside its administrative area could be explored in the future in order to meet the arising housing need of the borough. This work will need to test whether this approach is agreed as a sustainable location in the context of the wider housing market area and travel to work area and where the existing infrastructure and environmental constraints can be resolved<sup>49</sup>. In these cases, developments should be laid out and designed to be reflective of their location as part of Crawley and should not result in harm to the setting of the Masterplanned New Town or result in

<sup>48</sup> The Joint Area Action Plan allocated this neighbourhood for 2,500 new dwellings. The additional 150 dwellings is due to planning permissions granted to change the initial use of the land within the allocation boundary.

<sup>49</sup> Consultation Draft Crawley Borough Local Plan Review, paragraph 2.29, Policy H1 and paragraph 12.15 (2019) CBC

urban sprawl or unplanned merging of settlements. They should protect the setting of Crawley's existing neighbourhoods at the edge of the countryside. The shared evidence base including the Strategic Housing Market Assessment and Economic Growth Assessment should be referred to, and all infrastructure impacts should be considered cumulatively.

### Strategic Policy H3g: Urban Extensions

Housing development through urban extensions on or close to Crawley's administrative borough boundaries will be supported by Crawley Borough Council where it can be shown that:

- i. Development is to come forward through a Plan-Led process, supported by clear cross-boundary and site-specific Local Plan policies, including scoping the potential for the preparation, development and adoption of Joint Area Action Plans in partnership with the relevant neighbouring authority;
- ii. The proposals are supported by a comprehensive Masterplan agreed by the relevant authorities (including the county council), see Policy CD5;
- iii. Cumulative infrastructure needs are clearly identified and met, and the proposal would not result in severe cumulative impacts of the development for existing residents in Crawley, including in terms of traffic and transport, flooding and drainage, air quality, town centre and social facilities;
- iv. If development is proposed to the western side of Crawley, the scoping, design and delivery of the comprehensive Western Relief Road (connecting from A264 to A23) should be agreed and provided prior to the completion of properties unless otherwise agreed by the three local authorities: Horsham District, Crawley Borough and West Sussex County Councils;
- v. Crawley's character as a compact town within a countryside setting, developed on a neighbourhood principle which maximises the use of sustainable transport is maintained – other relevant policy in this regard includes Policy CD4a;
- vi. The design of the urban form and infrastructure is of high quality design which is not unnecessarily prominent in the existing landscape setting;
- vii. Developments are designed and progressed as comprehensive neighbourhoods rather than incremental ad hoc development;
- viii. Neighbourhood centres containing local facilities and services are provided in order to meet the day-to-day needs of residents;
- ix. The development is provided to help address unmet development needs arising from Crawley, including in relation to housing mix, type, tenure and affordability; complementary employment and economic growth needs; social, education and health needs; and strategic recreation and leisure requirements;
- x. Linkages are maintained from Crawley's neighbourhoods through new development to the countryside beyond (both in terms of active transport and visual links) as well as prioritising sustainable modes of transport links into existing Crawley neighbourhoods and the town centre, making car journeys a longer, more circuitous option;
- xi. A landscape character, setting and heritage appraisal has been undertaken which 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;

- xii. Assessment of the impact of the development on the landscape character, setting and heritage of the area, and the setting of Crawley's neighbourhoods, has been undertaken 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;
- xiii. Development is designed and planned to carefully address both its connections to existing Crawley neighbourhoods as well as the wider countryside beyond, see Policy CD4(a) and (b), providing defensible boundaries which both prevents inappropriate merging of settlements or the effects of urban sprawl and ensures the careful stitching together of existing and new built form where appropriate;
- xiv. Ancient woodland or veteran trees would not be damaged or lost and an appropriate buffer 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 provided;
- xv. Development must incorporate strategic Green Infrastructure throughout, providing ecological linkages, in particular to support pollination, and result in a Net Gain to biodiversity;
- xvi. 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.

### **Reasoned Justification**

- 12.75 *Well planned urban extensions which provide comprehensive, sustainable new neighbourhoods with local facilities and services, relate well to their rural landscape character and protect the setting of Crawley's neighbourhoods could form an important way to meet Crawley's housing needs. Whilst these developments will be outside Crawley's boundary, the criteria set out in the Policy will be used to inform discussions with neighbouring authorities and potential developers, and responses to emerging policies and planning applications. Where appropriate, Joint Area Action Plans would provide the most robust way to ensure Crawley's needs and concerns are fully addressed.*
- 12.76 *Urban extensions should meet their own infrastructure needs on site to serve their new residents. It is inevitable that these residents will also access larger scale existing facilities in Crawley, including the town centre, leisure facilities and transport networks. These will also be affected by development within Crawley and it is important that cumulative impacts are assessed and developments fund improvements to ensure there is no adverse impact on Crawley's residents.*
- 12.77 *The need for a Western Relief Road for Crawley has been recognised but it has not yet come forward despite the development of Kilnwood Vale. If further urban extensions are proposed to the west of Crawley the route, design and delivery options for this road will need to be addressed. Policy ST4 provides more details.*
- 12.78 *In order to encourage the use of sustainable forms of transport whilst maintain access into the countryside from Crawley, road linkages into Crawley should be more circuitous, with more direct public transport, cycling and walking routes linking into Crawley's neighbourhoods.*
- 12.79 *Whilst located within Mid Sussex or Horsham Districts, any urban extension on the edge of Crawley should be meeting the unmet housing needs arising from Crawley, and should therefore meet Crawley's specific needs for affordable housing, housing mix, type, and tenure. The scale of urban extensions could also provide the*

*opportunity to meet unmet employment needs, or infrastructure requirements such as education and health, and could provide strategic leisure facilities serving the wider area.*

- 12.80 *New development, by its very nature, will always have a significant impact on the sense of place, space and open setting of an area, both perceived and tangible. Careful analysis is therefore required to assess whether certain elements of landscape structure, form, or character are a major component of or contributor to an established, recognised and enjoyed rural landscape setting. Not all areas have the same capacity to accommodate change without harm to the landscape setting. For example, where wide tracts of non-enclosed open fields or grassland exist, there is very limited capacity for change to the rural setting without impacting on the character of the area, and the setting of the areas adjacent to it. The proportion, scale and extent of these areas provides a sense of space and far reaching and expansive vistas. They provide a perceived and real sense of tranquillity due to the extensive absence of buildings and human presence and are important close to Crawley where such areas are very limited. In contrast, areas where the setting is characterised by woodlands or enclosed country lanes or hedgerow corridors provide contained views and a sense of enclosure.*
- 12.81 *Within the new development, important trees and ancient woodland should be appropriately protected and biodiversity should be enhanced through the provision of linked on site green infrastructure.*

#### **Policy H3g: Urban Extensions Consultation Questions:**

- Is it sufficiently clear what this policy means by 'Urban Extensions'
- Should consideration be given to sites beyond the borough's boundary for meeting some of Crawley's housing needs?
- What are the key concerns and matters the council should seek to be taken into account when engaging in developments outside the existing urban area?
- What are the opportunities which should be taken if considering further expansion of Crawley?
- Should this housing be sought for emerging Crawley households needs or should it incorporate elements of other needs from across the housing market area or wider?
- Should further neighbourhood scale developments be preferred or smaller incremental developments of just housing schemes?
- Are there any locations to which development should be directed or avoided?
- Are any facilities Crawley requires that could be provided on any such site?
- Are the requirements identified in this Policy appropriate for this type of development?
- Are there any further requirements which should be applied to this type of development?
- These developments are considered by the Local Planning Authority in which they are located, i.e. outside of Crawley Borough Council's remit. How best should the council engage in the process of planning for such development?

#### **Future Housing Mix**

- 12.82 Different households require different types and sizes of housing. It is important that an appropriate choice and mix of housing is provided across the borough in order to create balanced and sustainable communities. Widening housing choice broadens the appeal of an area and assists in meeting the needs of existing residents as well as attracting new residents to the borough. The council's Strategic Housing Market Assessment and its updates, identifies that Crawley has the highest proportional requirements for smaller properties.

## Strategic Policy H4: Future Housing Mix

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.

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. These should include smaller dwellings designed to meet the needs of families.

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 and provide strong justification for schemes which fail to provide a reasonable balance of property types and sizes, to promote mixed communities.

### Housing Mix Test:

In order to avoid an excessively distorted dwelling mix, major residential developments will be required to meet the following test:

- Step 1: where applicable, divide the scheme into separate tenures.
- Step 2: for each tenure, identify the 'median' size of unit on a notional, fully SHMA-compliant, development of equivalent scale and location.
- Step 3: compare the notional median to the proposed scheme and ensure that neither the proportion of units smaller, nor the proportion of units larger than the notional median, exceeds 90%.

### Reasoned Justification

12.83 *Ensuring that new housing takes account of local need to create neighbourhoods where there is genuine choice of the right housing in terms of size, type, tenure, and affordability, both at neighbourhood and borough wide level, is essential. The council will therefore encourage a mix of housing that will be appropriate to the needs of the community taking account of the information within the SHMA and its updates, to provide a range of types, sizes, tenures and affordability including housing for the elderly, lifetime homes and other specialist housing needs.*

12.84 *The recommended mix across all priority bandings and affordable tenures, and private ownership and private rent is set out below:*

	<b>60% Market Housing Element</b>		<b>40% Affordable Housing Element</b>
	<i>Owner Occupier Market Housing</i>	<i>Private Rental Market Housing</i>	
<i>1 Bed</i>	10%	5%	25%
<i>2 Bed</i>	30%	30%	50%
<i>3 Bed</i>	35%	40%	20%
<i>4+ Bed</i>	25%	25%	5%

12.85 *The council will expect new residential schemes to reflect the latest evidence of need, subject to density and character considerations. Town Centre mixed use developments will be expected to be built at higher densities while including family accommodation, in accordance with Policy H3d (see paragraph 12.66). However, this*

may not necessarily be suitable for all sites. Policy CD10 establishes the need for all new development to be designed inclusively, including for residential units to demonstrate they are able to meet Building Regulations Part M Category 2 requirements and Policy CD11 identifies the required internal space standards for all new dwellings. Further guidance, including for external space, is provided in the Urban Design SPD.

- 12.86 The council will particularly seek to achieve a mix of dwelling sizes to meet local housing need. The Affordable Housing Needs Model (2014 SHMA Update) has found that the demand for new homes for those in local housing need falls predominantly towards the smaller one-bedroom and two-bedroom units.

#### Policy H4: Future Housing Mix Consultation Questions:

- Is this policy likely to help ensure that the type of housing delivered in Crawley meets local needs?
- Is the “housing mix test” referred to in this policy appropriate and justified?
- If the test is appropriate and justified in principle, is 90% an appropriate threshold to use? If not, what would be?

### Affordable Housing

- 12.87 All Local Plans are required by the NPPF to make provision for meeting affordable housing needs in their area. Failure to address affordable housing needs would have detrimental implications on the economic and social health of the town. Therefore, it is important to secure an appropriate mix of housing types and tenures within developments that come forward over the Plan period.

#### Strategic Policy H5: Affordable Housing

##### Affordable Housing

40% affordable housing will be required from all residential developments.

The council will expect a minimum of 70% of the affordable housing to be Affordable Rent, or Social Rent where other forms of subsidy exist, and up to 30% Intermediate and/or Affordable Home Ownership tenure. This equates to 28% of the total scheme for Affordable/Social Rent and 12% of the total scheme as Intermediate Tenures.

For sites of 10 dwellings or less, a commuted sum towards off-site affordable housing provision will be sought, unless on-site provision is preferred, with the on-site tenure mix to be agreed.

##### Exceptions

Except for sites of 10 dwellings or less, payments in lieu will only be accepted in exceptional circumstances where it can be demonstrated that there are robust planning reasons for doing so and provided that the contribution is of equivalent financial value.

Only in exceptional circumstances of robustly assessed viability will the council consider relaxing this affordable housing requirement, in part or in full, if the scheme can also evidence that it addresses a demonstrative need. In such situations the scheme is expected to appraise various permutations of affordable housing provisions, and where concessions are agreed by the council then claw-back mechanisms will be expected to be put in place and the scheme independently assessed on an open-book basis.

### Reasoned Justification

- 12.88 Since 2001, house prices have grown significantly, increasing by over 7% in the period to March 2013. At the same time, average household earnings in the borough

are relatively low when compared with those in the adjoining districts of Mid Sussex and Horsham. The Strategic Housing Market Assessment (2014 SHMA update) concluded that about 56% of emerging households are now unable to afford Affordable Rent at 80% of market rent values without further assistance, and that 31% of households would require assistance to be in a position to afford rentals set at Social Rent levels, which is based on the differential of local rent relative to local incomes, and 62% of households are unable to purchase, based on the differential of local house prices and local rent levels relative to local incomes.

- 12.89 Affordable housing refers to properties that are offered by the local authority or Registered Providers for rent or part-ownership at affordable levels to eligible households whose needs are not met by the housing open market. The council expects rentals to be offered below market rent levels that shall not exceed 80% of open market rent values and shall not exceed Local Housing Allowance rent levels or its equivalent, inclusive of service charges, and provided that there are provisions in place for those homes to remain affordable for future eligible households. Council will always pursue perpetuity in affordable housing provision to ensure the ability to serve future households over the long-term.
- 12.90 The council requires 70% of the affordable housing to be rental tenure, and while Social Rent at target rent levels is preferred as being more affordable to those in housing need, the council accepts that this form of tenure requires significant levels of subsidy. In the absence of sufficient subsidy, Affordable Rent tenure, as defined by the NPPF, will be acceptable and will be the minimum expectation in every instance.
- 12.91 The intermediate housing market is identified as an emerging housing market; made available to households with incomes that do not qualify for Social Rent or Affordable Rent and who are unable to buy a home on the open market. Intermediate housing includes Shared Ownership, Shared Equity, Discounted Market Sale and Rent to Buy products which offers an element of perpetuity to address affordable housing needs into the long-term.
- 12.92 While Crawley's predominant requirement is for affordable rented accommodation, Crawley also has a need for "intermediate" affordable housing. The Strategic Housing Market Assessment (2014) identifies Crawley as having a relatively high demand for intermediate housing, with 64% of those interested already living within the borough and 53% of those interested presently working within the borough. The SHMA also identifies that at least 20% and up to 30% of affordable housing across the housing market area should be provided as intermediate housing. The SHMA is currently in the process of being updated. The emerging up-to-date evidence will feed into the Local Plan Review as it progresses.
- 12.93 Reflecting the diversity of needs, the council will expect up to 30% of the affordable housing element to be as "intermediate" tenure. The council recognises that for the smaller sites, this tenure split may sometimes be impractical in management terms. In such cases the composition of affordable housing will be agreed having regard to site specific circumstances and the particular needs of the locality, with rental accommodation remaining the first choice of tenure. The split between affordable housing for rent and other intermediate affordable housing will be kept under review through Supplementary Planning Documents, as appropriate, reflecting changes in local needs and development viability.
- 12.94 The NPPF establishes an expectation that major development involving the provision of housing should include at least 10% of the homes to be available for affordable home ownership<sup>50</sup>. However, exceptions to this element is allowed for where this would "exceed the level of affordable housing required in the area or significantly

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<sup>50</sup> As defined in the NPPF Glossary, National Planning Policy Framework, page 64 (2019) MHCLG

*prejudice the ability to meet the identified affordable housing needs of specific groups<sup>51</sup>. Emerging evidence suggests that Crawley does have an affordable home ownership need, but recommends the intermediate tenures (such as shared ownership) are a more appropriate form of affordable home ownership for Crawley and, because there is a clear and acute need for rented affordable housing from lower income households, it is important that a supply of rented housing is maintained to meet the needs of this group. Where affordable home ownership is agreed, securing perpetuity to ensure housing remains at a discount for future eligible households will be the council's priority. More detail will be provided in the updated Affordable Housing Supplementary Planning Document in due course.*

- 12.95 *Private Market Rent falls outside of the definition of affordable housing. However, this form of tenure is emerging through the Build to Rent programme. Together with other forms of rental housing, this tenure may play a part in meeting affordable housing need if rent levels are contained within Local Housing Allowance rates with nominations offered to the council. This can help to meet local housing need as it is aimed at people otherwise unable to rent on the open market. The council's policy approach to affordable housing provision in Build to Rent schemes is detailed further below.*
- 12.96 *Section 106 Planning Agreements (or Unilateral Undertakings) will be required to secure delivery of the affordable housing. The council will expect affordable housing to receive free serviced land as a starting point, whereby the Registered Provider receives transfer of the built-out units at a price commensurate with the affordable tenure or under special circumstances receives free transfer of serviced land at an equivalent aggregate value. The S106 Agreement will require applicants to provide an Affordable Housing Scheme setting out the provisions of affordable housing in keeping with this policy requirement.*
- 12.97 *In exceptional circumstances, the council may be required to consider viability, where schemes may be faced with abnormal costs, and in such instances a detailed viability assessment will need to be submitted, modelling various affordable housing options, which shall be independently assessed at the developer's expense, and where any concessions are agreed for viability reasons the S106 Agreement will be expected to include claw-back provisions, and an independent assessor appointed at the developers expense to monitor the scheme on an open-book basis against the claw-back provisions.*

#### **Policy H5: Affordable Housing Consultation Questions:**

- Do you agree with the requirement for 40% affordable housing on all residential developments? If not, what would be a better percentage and why?
- Do you agree with the proposed breakdown of affordable housing provision between different types of affordable provision? If not, what would be a better breakdown and why?

### **Build to Rent**

- 12.98 Build to Rent is considered to be a distinct asset class within the private rented sector in Planning Practice Guidance, and has been defined in the NPPF glossary in order to simplify its treatment within the planning system. According to the NPPF, Build to Rent means 'purpose built housing that is typically 100% rented out'<sup>52</sup>.

<sup>51</sup> National Planning Policy Framework, para. 65 (2019) MHCLG

<sup>52</sup> National Planning Policy Framework, Glossary (2019) MHCLG

## Strategic Policy H6: Build to Rent

A proposal including Build to Rent housing will be supported where it is in conformity with the other policies and requirements of this Local Plan.

Build to rent schemes can comply with Policy H4, whereby the council's affordable policy to secure a quota of affordable rented units is retained while the intermediate tenure requirement is deferred for as long as the scheme remains all-rental, which shall be provided in the following way:

- i. 28% of the scheme to be provided as affordable private rent, with rentals not exceeding either 80% of market rent values, or Local Housing Allowance rates;
- ii. 12% of units are to be identified as intermediate tenure for future provision, and to be deferred for as long as the scheme remains all-rental;
- iii. In the event that the scheme ceases to be all-rental, the affordable units are to be made available to Registered Providers at their best consideration, as 28% affordable rent and 12% intermediate tenures respectively in order to achieve policy compliance of 40% affordable housing on a 70/30 tenure split.

In order to qualify as Build to Rent for the purposes of this Policy, schemes must adhere to the Build to Rent definition in the Glossary to the NPPF and will be required to enter into a S106 Agreement which will include provision regarding the following issues:

- a) Securing the status of the units as Build to Rent for at least 15 years;
- b) Securing the unified ownership and unified management across the Build to Rent scheme, embracing both Market Rent and Affordable Private Rent units;
- c) Affordable housing requirements (including review mechanisms where appropriate) and regular provision of evidence of compliance by the scheme operator;
- d) Securing to the council nomination rights in respect of the affordable units through an agreed lettings plan;
- e) Clawback mechanisms to secure compensation in the case of the loss of Market Rent homes before the expiry of the covenant period, or in the event that the affordable housing does not fully meet the policy requirement;
- f) Site management arrangements.

### **Reasoned Justification**

12.99 *Planning Practice Guidance states: 'As part of their plan making process, local planning authorities should use a local housing need assessment to take into account the need for a range of housing types and tenures in their area including provisions for those who wish to rent.' It further states that 'If a need is identified, authorities should include a plan policy setting out their approach to promoting and accommodating build to rent.'*

12.100 *To accommodate this particular investment model, and where ongoing management is to be provided in a fully rented scheme, the council will not require a Registered Provider to take on the affordable units, and council is prepared to defer the intermediate tenure requirement of the policy for as long as the scheme remains all-rental.*

12.101 *In such circumstances council will require the rentals to be made available at affordable rent levels, not exceeding 80% of the equivalent open market values and not exceeding Local Housing Allowance rates, and the council will enter into a Lettings Agreement to allow for nominations to be made into the affordable private rented units.*

12.102 *The scheme will be expected to enter into a S106 Agreement that will remain with the land, and in the event that the scheme ceases to be all-rental the S106 Agreement will require the affordable units, including the deferred intermediate tenure properties, to be made available to Registered Providers in line with councils affordable housing policy, which shall include any claw-back provisions in the event that council allows any concessions to the affordable housing policy requirements.*

#### **Policy H6: Build to Rent Consultation Questions:**

- Is it sufficiently clear what this Policy means by 'Build to Rent' developments?
- Are the requirements identified in this Policy appropriate for Build to Rent developments?
- Are there any further requirements which should be applied to Build to Rent developments?
- Generally, does the policy reflect the potential role which Build to Rent could play as part of Crawley's housing supply?

### **Self and Custom Build**

12.103 Self-built and custom-build housing is defined in the NPPF as 'housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing'<sup>53</sup>. Planning Practice Guidance states that 'in considering whether a home is a self-build or custom build home, relevant authorities must be satisfied that the initial owner of the home will have primary input into its final design and layout.'

#### **Strategic Policy H7: Self and Custom Build**

A proposal including self-build and/or custom-build housing to be provided on a serviced plot of land will be supported where it is in conformity with the other policies and requirements of this Local Plan.

Subject to the exceptions listed below a residential (Use Class C3) development including 50 or more units will be required to provide 6% of the total area occupied by residential plots in the form of serviced plots for self-build and custom housebuilding.

The exceptions are:

- i. Developments providing a proportion of affordable housing over and above the requirement detailed in Policy H4, which may offset this additional proportion against the self-/custom-build requirement by reducing the requirement by one percentage point for each additional percentage of units delivered as affordable housing;
- ii. Developments containing only flatted development;
- iii. Developments on sites whose total area is at least 50% brownfield;
- iv. Developments where the residential element consists solely of converted floorspace.

Self- and custom-build plots must have access to the public highway and connections to electricity, water, wastewater and telecommunications services, or be capable of being provided with them before the expiry of any planning permission or permission in principle granted in relation to them.

Self- and custom-build plots provided in accordance with the 6% requirement detailed above will be subject to a legal agreement requiring that they be marketed for 12 months,

<sup>53</sup> National Planning Policy Framework, Glossary (2019) MHCLG

after which they may be developed as speculative housing in accordance with the other policies and requirements of this Local Plan.

Any proposal (either in the form of an outline or full application) for more than one dwelling which includes an element of self- or custom-build housing must be identified as a phased development and supported by a phasing plan.

### **Reasoned Justification**

12.104 *The Self-build and Custom Housebuilding Act 2015 requires Local Authorities to maintain a register of individuals and associations who are seeking to acquire serviced plots of land for the purpose of building homes for their own occupation. The same Act requires councils to have regard to the demand demonstrated by their Register when carrying out their functions with regard to planning, housing, the disposal of council land, and regeneration.*

12.105 *As of 1 April 2019, there were 71 individuals and no associations entered on Crawley Borough Council's Self-build and Custom Housebuilding Register. The Register is divided into Part 1 and Part 2, with only applicants who pass a Local Connection Test being included in Part 1. As of 1 April 2019 there were 59 individuals on Part 1 of the Register and 12 on Part 2.*

12.106 *The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) further introduces a 'Duty to Grant Planning Permission'. This requires the council to grant 'suitable development consent' in respect of a sufficient number of serviced plots of land to match the number of entries on Part 1 of the Register. Entries are divided into annual 'base periods', according to their date, with the corresponding suitable development consents being required to be granted within three years after the end of each base period.*

### **Policy H7: Self and Custom Build Consultation Questions:**

- Is this Policy likely to support the objective of satisfying demand within Crawley for self-build and custom-housebuilding? If not, why?
- How else can the Local Plan support this objective?
- Are the requirements detailed above appropriate for developments including self-build and custom-housebuilding?
- What other requirements should be applied to developments including self-build and custom-housebuilding?

### **Gypsy, Traveller and Travelling Showpeople**

12.107 The Housing Act 2004 requires all local authorities to assess the accommodation needs of Gypsies, Travellers and Travelling Showpeople, take account of their needs in accommodation assessments, and outline how identified needs will be met. Furthermore, the National Planning Policy for Traveller Sites requires that local planning authorities make an assessment of their accommodation needs for the purposes of planning and to develop fair and effective strategies to meet this need through the identification of land for sites.

### **Strategic Policy H8: Gypsy, Traveller and Travelling Showpeople Sites**

#### Site Provision

The following site is allocated on the Local Plan Map as a reserve Gypsy and Traveller site for up to ten pitches to meet the future needs of the existing population within Crawley. This site is considered to be critical to the delivery of future Gypsy and Traveller

pitches in Crawley and is identified as being 'developable' in years 6-10 or 11-15 (2020/2021 – 2029/2030) of the Plan, dependent on when the 'need' arises.

- Broadfield Kennels, southwest of the A264

Acceptable development of this site will include adequate highway and pedestrian and cycle access being achieved, along with appropriate design, layout and landscaping to ensure the requirements of the AONB Management Plan are satisfied and the impacts of development adjacent to the country park are mitigated. Both the landscape character and ecological value of the Broadfield Kennels site will be assessed, and any harmful impacts will be adequately mitigated if required.

Ongoing monitoring of Gypsy, Traveller and Travelling Showpeople accommodation needs within Crawley will ensure that any identified 'need' for a Gypsy and Traveller pitch is accommodated on the reserve site.

#### Criteria for Assessing other Proposals

Proposals for a new permanent or transit Gypsy, Traveller and Travelling Showpeople site will only be considered suitable if the proposed site:

- a) is not subject to existing or predicted air, road and/or rail noise in excess of 57 decibels for permanent sites, 60 decibels for long term temporary sites of up to one month, and 66 decibels for temporary sites;
- b) does not create a design and amenity impact that is incompatible with the surrounding area, particularly when located within residential areas or on land beyond the Built-up Area Boundary;
- c) is not located in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans;
- d) is in a sustainable location that reduces the need for long distance travelling, and to reflect traditional lifestyles, whereby some travellers live and work in the same location;
- e) avoids placing undue pressure on infrastructure and community services; and
- f) meets an identified local need for Gypsy, Traveller and Travelling Showpeople accommodation.

Where proposals are located in areas predicted to be noise affected at some point in the future, temporary planning permission may be appropriate.

#### **Reasoned Justification**

12.108 *Crawley is a constrained urban environment and is in a position where difficult prioritisation of new development is required as the last undeveloped or underdeveloped sites are allocated for future uses. This situation results in high land values and limited opportunities for Gypsies, Travellers and Travelling Showpeople to bring forward site provision themselves. There are currently two authorised Gypsy and Traveller sites in Crawley, for four pitches in total, and one authorised site for Travelling Showpeople with three plots, but there is a more substantial local population living within bricks and mortar accommodation.*

12.109 *The current Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2014) for Crawley indicates a potential future need of up to ten pitches for Gypsies and Travellers arising from the existing population within Crawley. Whilst the survey work completed for those in bricks and mortar accommodation has not identified any immediate need for additional sites, it is inherently improbable that within the next 15 year period there will be no new households formed requiring additional site provision.*

12.110 *This need will be met by the provision of a site at the former Broadfield Kennels, southwest of the A264. This site is located within the High Weald AONB and outside the current Built-Up Area Boundary (BUAB). Therefore, the site will need to be well*

*planned and soft landscaped to ensure that the visual impact on the AONB is negligible and that the natural landscape is, where possible, positively enhanced. Mitigation measures for the potential impact on the natural environment will be sought where appropriate. The council will continue to search for and analyse the potential for alternative sites as factors change over the Local Plan period, most critically in relation to the future expansion of Gatwick Airport. The council will continue to work cooperatively with its neighbouring authorities to maintain constructive joint working across the Gatwick Diamond.*

12.111 *In addition, this Policy also outlines the criteria upon which any other Gypsy, Traveller and Travelling Showpeople proposals will be assessed to ensure site provision occurs in locations that offer a suitable living environment for future inhabitants and protects existing neighbours from inappropriate development.*

12.112 *To deal with sites brought forward privately on unallocated land, land ordinarily considered suitable for housing development will be considered suitable for traveller accommodation subject to the proposal being compatible in design and amenity terms with the surrounding area, especially where proposals include employment based activities within their proposals. However, caravans offer a much lower level of acoustic attenuation than bricks and mortar accommodation and the long term exposure to noise would affect the residents' health. Exposure to noise in excess of 57 decibels on a permanent basis, 60 decibels for long term temporary sites of up to one month and of 66 decibels for temporary sites would not be in the long term interest of future inhabitants. Because Crawley has uncertainty surrounding the potential expansion of Gatwick Airport to a two runway operation, areas of the borough currently falling inside acceptable limits may become unsuitable in the future as noise contours migrate south into the built up area. For these areas, temporary permission may be an appropriate decision until certainty is achieved.*

#### **Policy H8: Gypsy, Traveller and Travelling Showpeople Sites Consultation Questions:**

→ Do you have any new evidence which should be considered in determining whether there is a need for additional Gypsy, Traveller and Travelling Showpeople pitches and plots?

### **Houses in Multiple Occupation**

12.113 A house in multiple occupation (HMO) is a property that is occupied by a number of individuals who share facilities, or do not have exclusive occupation of the whole property. HMO's generally comprise accommodation where two or more individuals share basic amenities (bath/shower, WC or kitchen). HMO's can commonly be occupied by a group of individuals (e.g. students, young professionals, etc.) sharing a house or flat, individuals living in sub-divided bed-sit accommodation, and some properties converted into several flats. Bed and breakfast and hostel accommodation occupied by individuals as their permanent address are also considered to be HMO's.

#### **Strategic Policy H9: Houses in Multiple Occupation**

Proposals for the development and change of use of an existing property to a House in Multiple Occupation will normally be permitted provided that:

- i) The location, design and layout of the development is appropriate for the proposed occupiers;
- ii) The proposal, by virtue of its intensity of occupation and activity or due to its cumulative impact in the area, would have no adverse impact upon the character of the area and the amenity and privacy of neighbouring properties;

- iii) Development can meet its operational needs (e.g. parking, servicing) including Crawley Borough Council's adopted HMO Standards.

### **Reasoned Justification**

- 12.114 *Houses in Multiple Occupation provide a much-needed source of housing supply in Crawley, particularly for people employed in the service sector. However, a large number of HMOs in one area can change the physical character of that area and this can lead to conflict with the existing community. Tenants equally can suffer from poor conditions and mismanagement of the properties by landlords.*
- 12.115 *There continues to be a need for this type of accommodation in Crawley since it provides affordable and convenient accommodation for a wide range of groups, including young single people and those requiring care in the community. Whilst shared accommodation is normally appropriate within residential areas close to shops and services, it can also cause problems due to the intensity of occupation and activity. Accordingly, regard must be had to the standard of this accommodation, traffic, and parking implications together with its impact upon the amenity and privacy of neighbouring properties and the general character of the area. Appropriate measures may be required to minimise the transmission of noise and generally to avoid causing a nuisance to neighbouring properties.*
- 12.116 *Policy H4 (Future Housing Mix) recognises that the planning system can assist in achieving a mix of households within the town's neighbourhoods by meeting different housing needs whilst protecting the interests of other residents, landlords and businesses. This can best be delivered by preventing the development of excessive concentrations of HMOs and encouraging a more even distribution across the town. Some neighbourhoods, including Furnace Green, Southgate, West Green and Langley Green have significant concentrations of HMOs, particularly in areas with larger semi-detached and detached dwellings.*
- 12.117 *The main concern with HMOs is that a large number of individuals can occupy one property, all living independently and creating more disruption to surrounding areas than a group of people living together, in terms of noise, parking and general disturbance associated with daily routines.*
- 12.118 *Inadequate parking leading to unauthorised parking is a significant issue in many neighbourhoods in Crawley, with the early New Town neighbourhoods planned with one car parking space per nine houses, and it is therefore important to have policies which can control issues such as this. It is also important to ensure that permission is only granted for those properties that have adequately sized rooms and suitable communal facilities for its occupants as well as being in appropriate locations, in terms of proximity to public transport routes.*
- 12.119 *Given that councils no longer have control over the loss of dwellinghouses to small HMOs, there is a high risk of concentrations of HMOs. It is therefore considered that, where possible, new HMOs should be monitored by location and concentration. Consideration may need to be given to the need to introduce Article 4 Directions in certain locations removing Permitted Development Rights for the conversion of dwellings to small HMOs.*

### **Policy H9: Houses in Multiple Occupation Consultation Questions:**

- Is this policy justified and necessary?
- Are the requirements detailed in this Policy appropriate for developments including the establishment or creation of a House in Multiple Occupation?
- What other requirements are suitable for this kind of development?

## Environmental Sustainability

### **Protecting the Environment: Sustainability**

*By 2035, significant progress will have been made towards Crawley becoming a carbon neutral town. Active travel and public transport will be significantly improved and supported by a strategic road network. Electric Vehicles will be promoted along with, and through, e-car clubs. A strong road network will be complemented by a good public transport system, giving people choice about how they travel. As a modern town, the technological and communication infrastructure will be in place to ensure residents and businesses have the support needed to develop and grow.*

*Conserving natural resources to support future growth will be vital to the longevity of the town. Air, noise and water pollution will be reduced. The borough will prepare for the increasing effects of climate change, through adaptation measures including lower water usage standards and delivering a net gain in biodiversity, including through pollination and connectivity measures, to address and mitigate against losses.*



## Green Infrastructure & Biodiversity

- 13.1 Crawley's natural environment is of great importance to the health and wellbeing of the people who live, work and visit Crawley. Its role includes a setting for recreation, relaxation, wildlife conservation and adapting to and mitigating the effects of climate change.
- 13.2 Throughout the urban area and on the fringes of the town there are many sites that are important for nature conservation and recreation from the wooded and open areas of grass in between houses to large local nature reserves and public parks. These areas make up a network of green space that support natural processes and are integral to the health and quality of life of the population. Most of Crawley's waterways flow underneath the urban area but also have an important leisure, visual and economic role in places such as Ifield Mill Pond and Tilgate Lake.

### Chapter Content

- 13.3 This chapter sets out policies to guide the relationship between development proposals and local, national and global environmental protection and enhancement of the borough's green infrastructure.

### The Key Issues

- 13.4 With an increasing population and the consequent need for development, the impact on the natural environment is a key issue. The planning policies in this chapter will ensure that Crawley's natural and semi-natural environment is enhanced as Crawley grows and changes over the next 15 years.
- 13.5 As a New Town, Crawley was originally designed with many green spaces and landscaping integrated within the developed area. These serve to separate and give identity to the neighbourhoods. Increasing levels of development present a potential threat to the amenity value of green infrastructure in Crawley. There is a risk that this becomes further fragmented and that the quantity and quality of green space is reduced.
- 13.6 The Natural Environment White Paper (DEFRA, 2011) highlighted that nature in England is highly fragmented and unable to respond effectively to pressures such as climate and demographic change. Crawley has an extensive network of green spaces, many of which have or are capable of increased biodiversity value to help the town adapt to climate change and create an overall net gain in biodiversity. It is important that the Local Plan ensures that development does not compromise the ability of the town to achieve the above aims and where possible that enhancement is encouraged.

#### Green Infrastructure Chapter Consultation Questions:

- Do you think biodiversity net gain should be a priority on new development sites?
- How do you think this could be done?
- What would encourage you and your community to support habitat creation
- What resources could be needed to promote pollination plans within local communities?
- Green Spaces of particular value to the local community can be given similar protection to Green Belt. Are there any sites in Crawley you believe should be considered for this designation?

### Green Infrastructure

- 13.7 Green infrastructure is the network of multi-functional green space and waterways both new and existing, and both rural and urban which supports the natural and ecological processes and is integral to the health and quality of life of the population.
- 13.8 It consists of useable spaces for both people and wildlife and ranges from large-scale areas of public open space and recreational space, including accessible countryside to smaller scale provision in the form of street trees, private gardens and allotments. The term 'multi-functional' refers to the various functions for example, local character, functional linkages, recreation, meeting community needs, visual amenity, biodiversity and/or local food or energy crop production.
- 13.9 Green Infrastructure can also offer benefits as a "Nature Recovery Network". This is a joined-up system of places important for wild plants and animals. It allows plants, seeds, nutrients and water to move from place to place and enables the natural world to adapt to change. It provides plants and animals with places to live, feed and breed. It can only do so effectively if, like our road network, it is treated as a joined-up whole.
- 13.10 The provision of safe and accessible green infrastructure is acknowledged as being one of the key ways to achieve healthy, inclusive and safe places which enable and support healthy lifestyles<sup>54</sup>. In particular for Crawley, as a Dementia-Friendly town, it is vital that people with dementia stay as active as they can – physically, mentally and socially. People with dementia need meaningful activities they enjoy, which can maintain their confidence. Access to green space and nature has particular benefits for people with dementia, including better mood, memory and communication and improved concentration<sup>55</sup>.

### Strategic Policy GI1: Green Infrastructure

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

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

<sup>54</sup> National Planning Policy Framework, para. 91c (2019) MHCLG

<sup>55</sup> Dementia and Town Planning RTPI Practice Advice 2017, page 4 (2017) RTPI

### **Reasoned Justification**

- 13.11 *Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries<sup>56</sup>.*
- 13.12 *Proposals for development will increase pressures on the borough's landscapes and green spaces, presenting opportunities for enhancing and extending Crawley's green infrastructure. For the town to develop and grow in a sustainable manner, it is important to ensure that green infrastructure is embedded in the planning process at the earliest stage.*
- 13.13 *Green infrastructure should not just be considered as an adjunct to new development. Connected networks of green spaces around new development should be treated as integral to the planning and design process conscious of its place within wider green infrastructure networks. This is assisted by an integrated review of existing green infrastructure functions (biodiversity, flood management, rights of way, open space, etc.). The Green Infrastructure Study identifies deficiencies and need in relation to future growth and the desires of the town's residents to determine where improvement should be focused.*
- 13.14 *The NPPF requires local authorities to plan strategic development considering the impacts on existing infrastructure and the need for new infrastructure to service that development and also to contribute to and enhance the natural and local environment. The Local Plan evidence base, including consultation responses, provides a clear message that Crawley's green infrastructure is fundamental to residents' quality of life and the wider environment. The green infrastructure policy and supporting development management policies seek to reflect that importance.*
- 13.15 *Through a range of Local Plan policies, the borough council will also seek to achieve the provision, retention and/or enhancement of the specific functions of green infrastructure:*
- a. Publicly accessible open space including formal sports facilities and informal amenity space;*
  - b. The High Weald Area of Outstanding Natural Beauty;*
  - c. Beyond the built up area where landscape character areas have been defined;*
  - d. Value of existing soft landscaping – character and appearance, structure, screening or softening;*
  - e. Requirements of development – amenity spaces including private gardens, landscape schemes, street trees, green roofs and walls and links to and between areas of public open space and accessible countryside;*
  - f. Areas of biodiversity value such as Sites of Nature Conservation Interest, Local Nature Reserves, adjacent SSSIs, Biodiversity Opportunity Areas and Ancient Woodland;*
  - g. Heritage Assets;*
  - h. Opportunities to meet open space, sport and recreation needs;*
  - i. Green spaces for flood storage, conveyance, and SUDS.*
- 13.16 *The council's Green Infrastructure SPD and Planning and Climate Change SPD provide further guidance to help applicants make successful applications and to aid the delivery of green infrastructure where required.*

#### **Policy GI1: Green Infrastructure Consultation Questions:**

- Is this policy still valid?
- Is the policy sufficiently clear?

<sup>56</sup> National Planning Policy Framework, para. 171 (2019) MHCLG

→ Are there other criteria the policy should include?

## **Biodiversity Net Gain**

- 13.17 Crawley Borough Council is committed to halting the overall decline in biodiversity by ensuring that development minimises impacts on biodiversity and provides net gains where possible including establishing coherent ecological networks that are more resilient to current and future pressures.
- 13.18 Through the 25 Year Environment Plan, the government is introducing a “net gain” principle into statutory policy. In assessing progress, a baseline needs to be set, and metrics and natural capital accounts developed to record progress so that accountability is embedded into the planning system. Natural capital is recognised to be at least as important as physical and human capital in producing economic outputs and hence economic well-being. In 2011, the government committed to working with the Office for National Statistics (ONS) and Defra to incorporate natural capital into the UK Environmental Accounts by 2020.

### **Strategic Policy GI2: Biodiversity and Net Gain**

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. Development will be required to demonstrate how it will meet the government’s requirement for securing a ‘net gain’ in biodiversity.

In the first instance, net gain for biodiversity will be expected to be achieved on site. Only where it is clearly justified this is not practicable to achieve, and where it is shown to have been considered and sought from the early stages of the design and layout of the development, will off-site provision, in the form of equivalent financial contributions, be agreed.

Applications should include consideration to securing benefits for the purposes of pollination and biodiversity as part of their on-site landscaping schemes. This can include consideration for green roofs and green walls, where soft landscaping at ground level is limited. Discussions with Gatwick Airport Limited in relation to planting and management to minimise the risk of bird strike should be held at an early stage of landscape design, in accordance with Policy CD7.

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

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

Compensation should consider losses of all the benefits provided by the natural environment.

Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

### **Reasoned Justification**

- 13.19 *Much biodiversity is outside designated areas. It is important that planning decisions take into account biodiversity by ensuring that decisions are based on sufficient information. The Sussex Biodiversity Record Centre data will be used to determine whether habitats or species of principal importance may be present, for which an Ecological Survey will be required. Where planning applications are considered to*

*have an impact on wildlife, advice will be sought from relevant national and local organisations.*

13.20 *The government's proposal within the 25 Year Environment Plan to introduce a net environmental gain requirement for new development offers a potential source of long-term investment in the delivery of an improved natural environment. Planning policies and decisions should encourage multiple benefits from both urban and rural land, including through mixed-use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside.*

13.21 *The government's National Pollinator Strategy for England (2014) sets out a 10 year plan to help pollinating insects survive and thrive across England. There are at least 1500 species of insect pollinators in the UK. Pollinators face many pressures that with good management can be mitigated against including:*

- Habitat loss*
- Pests and diseases*
- Extreme weather*
- Competition from invasive species*
- Climate change, and*
- Use of some pesticides*

*At a local level, advice and recommendations may include future West Sussex level action plans or strategies, those produced by or on behalf of the Sussex Biodiversity Record Centre and those prepared by Crawley Borough Council. Furthermore, the Local Nature Partnerships (LNPs) introduced through the Natural Environment White Paper aim to bring together local people and organisations to get the most out of the natural environment. LNPs are partnerships of a broad range of local organisations, businesses and people who aim to help bring about improvements in their local natural environment. The council will work closely with the LNP covering Crawley to prioritise resources towards the improvements and habitat creation which offers the most benefits for Crawley and the Sussex High Weald.*

13.22 *Simple definitions of environmental loss as being just the impact upon wild species or biodiversity are inadequate. Development can generate multiple impacts either directly on environmental assets or mediated through environmental impacts: wild species, recreation and related physical and mental health benefits; water quality and flooding; air pollution emissions and GHG, etc. it is the loss of benefit value generated by development which should be compensated for. Those whose activities give rise to the environmental damage should pay the associated costs of compensation.*

13.23 *In order to calculate the net gain in biodiversity required by new development, it will be necessary to quantify the financial resources needed for the maintenance, restoration and enhancement of ecosystems and natural capital in order to deliver multiple objectives for biodiversity, landscape, the historic environment, water, soil, climate, air quality, flood management and other ecosystem services. For example, restoration refers to the restoring of a site to the topographic shape, hydrologic function and plant communities that existed in historical times before disturbance by man. This practice can be expensive and generally requires detailed knowledge and regular management.*

13.24 *Habitat planting would require partnership with wider organisations. Habitats can be created through Local Nature Partnerships and through Nature Improvement Areas. Many NGOs and other organisations stand ready to offer practical advice and expertise on pollinator-friendly management and planting to land managers and others. These groups include Buglife, The Wildlife Trusts, Plantlife, the Bumblebee*

*Conservation Trust, Butterfly Conservation, Garden Organic, Sustain, the British Beekeepers Association, the Royal Horticultural Society and the Royal Botanical Gardens Kew Native Seed Hub.*

- 13.25 *The National Pollinator Strategy lists simple adjustments that land managers, including gardeners, window-box owners, councils, amenity managers and businesses can make to existing planting and management to improve the quality and extent of habitats suitable for pollinators.*
- 1. Grow more flowers, shrubs and trees that provide nectar and pollen as food for bees and other pollinators throughout the year. For example, pussy willow, primroses and crocuses in spring, lavenders, meadow cranesbill and ox-eye daisies in summer, ivy and hebes in autumn, and mahonia shrubs and cyclamen in winter.*
  - 2. Leave patches of land to grow wild with plants like stinging nettles and dandelions to provide other food sources (such as leaves for caterpillars) and breeding places for butterflies and moths.*
  - 3. Cut grass less often and ideally remove the cuttings to allow plants to flower.*
  - 4. Avoid disturbing or destroying nesting or hibernating insects, in places like grass margins, bare soil, hedgerows, trees, dead wood or walls.*
- 13.26 *Other simple opportunities to support the pollination agenda can include careful thought about whether to use pesticides especially where pollinators are active or nesting or where plants are in flower. Consider control methods appropriate to the situation and only use pesticides if absolutely necessary. Many people choose to avoid chemicals and adopt methods like physically removing pests or using barriers to deter them. If pesticides are used, always follow the label instructions.*

#### **Policy GI2: Biodiversity and Net Gain Consultation Questions:**

- The previous ENV2 policy has been split into two in order to clarify the approach between seeking net gain (GI2) and protection of biodiversity and habitat sites (GI3)? What are the benefits of this? What are the possible concerns?
- Should pollination be included as part of Net Gain or is it a distinct Policy theme in its own right?
- What specific goals should be priorities in terms of achieving net biodiversity gains?
- What approaches to achieving net biodiversity gains are available given the limited available supply of land in Crawley, and close proximity of the airport, and what are their relative merits?
- Is there a general understanding on measures to enhance biodiversity?
- How can local communities become better involved in supporting a local pollination agenda?
- Is there sufficient information to encourage and ensure a net gain in biodiversity in Crawley through individual development schemes' planning applications on a site-by-site basis?

### **Biodiversity Sites**

13.27 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; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

- b) Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

### Strategic Policy GI3: Biodiversity Sites

Habitat and species surveys and associated reports will be required to accompany planning applications which may affect the areas listed below or sites showing likely ecological value based on past ecological surveys.

#### Hierarchy of Biodiversity Sites

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

1. Nationally designated sites:

- Sites of Special Scientific Interest (SSSI)

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

2. National Planning Policy Framework Sites

- Ancient Woodland, and aged or veteran trees

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. A buffer zone between development and ancient woodland will be required in line with Natural England Standing Advice.

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

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

#### **Reasoned Justification**

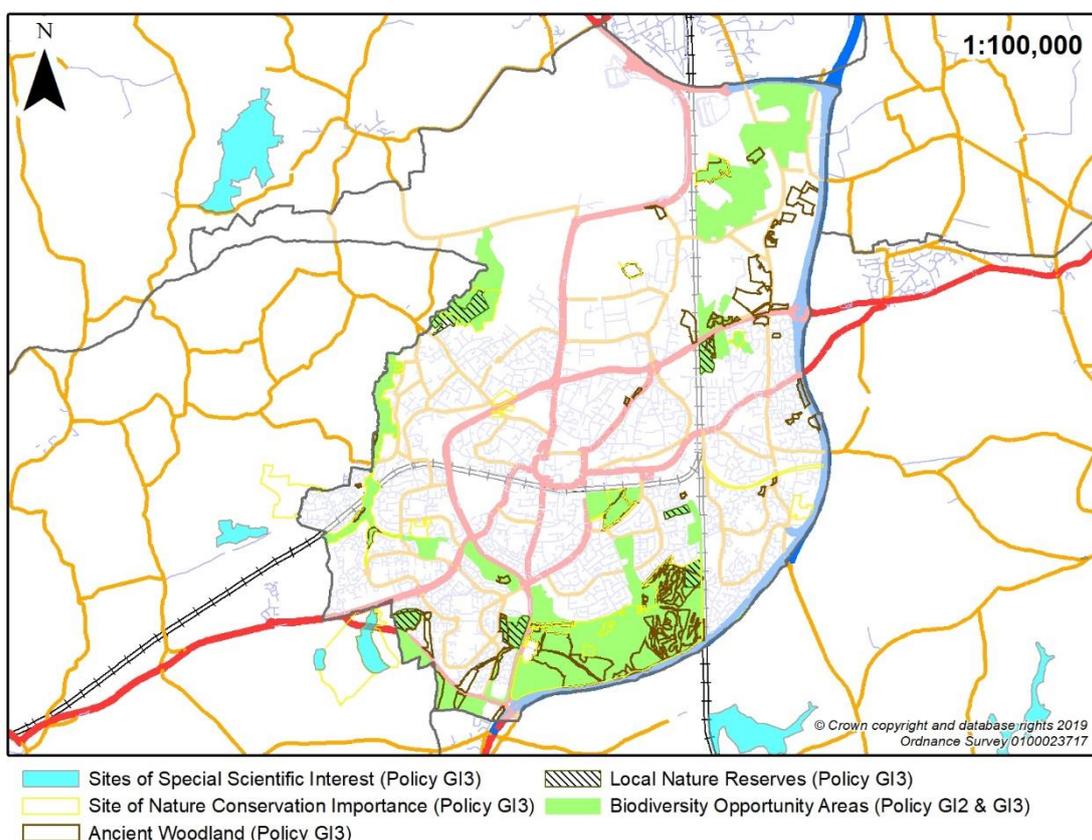
13.28 *As a public body, Crawley Borough Council has a duty to have regard to the conservation of biodiversity through the proper exercising of all its functions. This is a statutory function set out in Section 40 of the Natural Environment and Rural Communities Act, 2006.*

13.29 *This means that the consideration of biodiversity must be embedded in planning policy which should be making a contribution to the commitments set out in Biodiversity 2020: A Strategy for England's Wildlife and Ecosystems Services. The ambition is to halt overall loss of England's biodiversity by 2020 and in the longer term, move from a position of net biodiversity loss to net gain.*

13.30 *To support this ambition the Local Plan Map identifies the components of Crawley's ecological network. This ensures that biodiversity is considered, from protection of habitats and species to identifying opportunities to enhance biodiversity.*

13.31 *The council will continue to work collaboratively with partners including Local Nature Partnerships to protect and improve the natural environment based on locally identified priorities and evidence. The Sussex Biodiversity Partnership works together towards achieving biodiversity targets. Biodiversity Opportunity Areas have been identified throughout the south east and are the regional priority areas of opportunity for restoration and creation of Biodiversity Action Plan (BAP) habitats. Within the borough, this includes the Urban Habitat Action Plan (HAP) which highlights the rich biodiversity in Sussex’s urban areas as well as the Deciduous Woodland, Lowland Heathland, and Lowland Meadows HAPs.*

13.32 *Ancient Woodlands are valuable as a biodiversity resource for its diversity of species and longevity as woodland. Areas of ancient woodland are identified on the Local Plan Map and protected by national policy. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat site<sup>57</sup>.*



**Policy G13: Biodiversity Sites Consultation Questions:**

- Are the Strategies and priorities covered by this policy up-to-date?
- Are there additional sites and habitats which need to be covered?

<sup>57</sup> National Planning Policy Framework, para. 177 (2019) MHCLG

## Local Green Space

13.33 The NPPF empowers local communities to promote the designation of green areas of particular importance for special protection as a Local Green Space.

### Strategic Policy GI4: Local Green Space

The following area is designated as Local Green Space:

#### Ifield Brook Meadows and Rusper Road Playing Fields

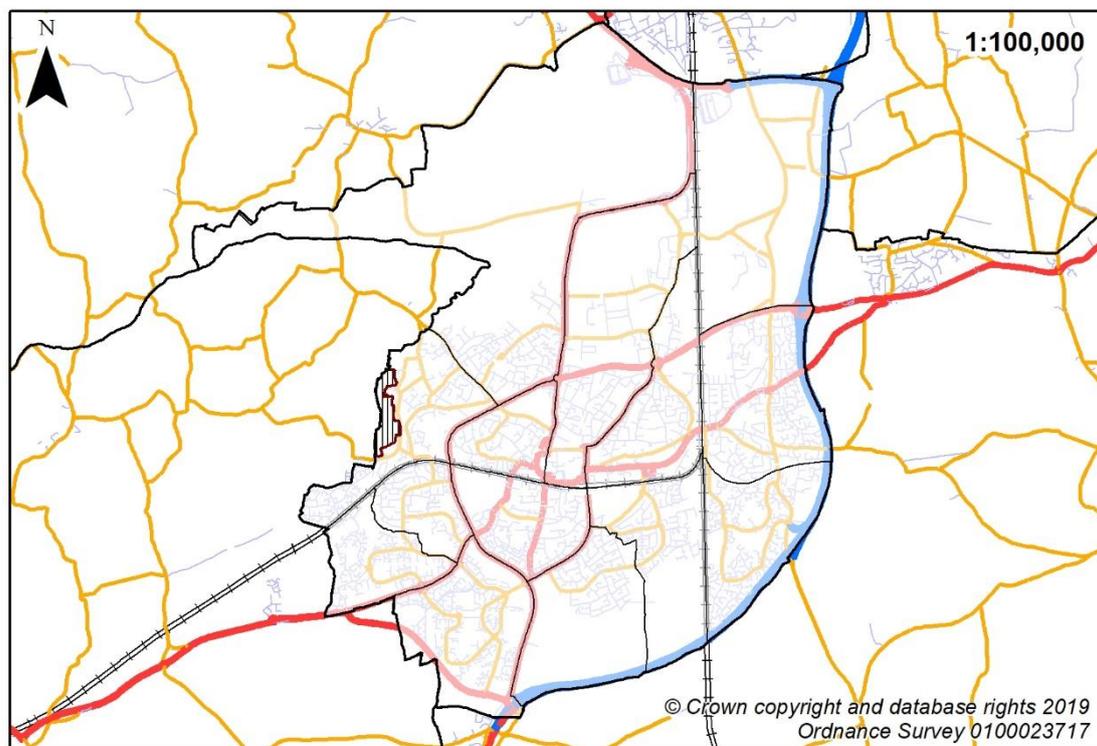
This area is designated due to its value to the local community and local significance in its function as an area for enjoyment of recreation, tranquillity, wildlife, heritage, and highly accessible countryside close to the urban area.

The above area will be safeguarded from development other than in very special circumstances or where the development is to enhance Local Green Space functions for example through improvements to access, recreation and wildlife.

### **Reasoned Justification**

13.34 *Public consultations have consistently shown that Ifield Brook Meadows and Rusper Road Playing Fields should be protected because of their special value to the local community. The Meadows are an important site of nature conservation with distinctive vegetation and wildlife. The northern part of the Meadows is of historic importance, forming part of the Ifield Village Conservation Area, contributing to the setting of the village and church. These elements make this area unique and local in character.*

13.35 *The presumption in favour of sustainable development does not apply to Local Green Spaces. Proposals affecting the designated Local Green Space should be consistent with national Green Belt Policy.*



 Local Green Space (Policy GI4)

**Policy GI4: Local Green Space Consultation Questions:**

- The Local Green Space designation should only be used where the green space is:
  - a. In reasonably close proximity to the community it serves;
  - b. Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
  - c. Local in character and is not an extensive tract of land
- Are there any other sites which you consider would meet the above criteria and should be designated as a Local Green Space in Crawley?

## Sustainable Design & Construction

- 14.1 Crawley is committed to supporting our legally binding national carbon reduction targets and being carbon neutral by 2050; this is to be achieved by aligning with the national zero carbon agenda in planning policies and by engaging with local businesses and communities.

### Chapter Content

- 14.2 This chapter sets out policies to guide the relationship between development proposals and local, national and global environmental protection.

### The Key Issues

- 14.3 With an increasing population and the consequent need for development, the impact on the natural environment is a key issue. The planning policies in this chapter will ensure that Crawley's environment is enhanced as Crawley grows and changes over the next 15 years. A number of challenges to address the sustainable future of the borough exist.
- 14.4 **A Compact Urban Borough:** The town was developed as a new town in the 1950s, and all development followed the neighbourhood principle which provides a sustainable pattern. This ethos is still central to the way the town is planned today and provides an increased opportunity for local energy production on a network basis. However the compact nature of the borough and changing climate patterns are expected to increase the frequency and severity of heatwave events. Such events are likely to be of increased severity in Crawley due to the relatively high levels of radiant energy the area receives, combined with the urban heat island effect typical of compact urban areas.
- 14.5 **Water Stress:** The South East, including Crawley, is an area of extreme water stress. It is among the worst areas in the UK. Therefore, more stringent water efficiency measures should be required from housing and commercial property development.
- 14.6 **Gatwick Diamond:** Crawley and its surrounds have been identified as an area of significant change and growth. Given its geographical location at the heart of the Gatwick Diamond and the significant amount of both commercial and residential growth expected throughout the life of the Local Plan, there is a need to consider the impact on the local environment and to plan for sustainable growth. This is exacerbated by the resultant in-commuting to the area and regional focus of growth that would otherwise be experienced across a number of authorities. This is also supported by the fact that the main commercial area, Manor Royal is currently responsible for 28% of the town's carbon emissions. This will increase if growth for the Gatwick Diamond area is focused there.
- 14.7 **Gatwick Airport:** Given the proximity of the international airport, there are a number of local impacts that would affect how climate change is dealt with. From the increase in traffic movements in the local area, to the restrictions in terms of building heights and safeguarding, the operation of the airport requires the Local Authority to act differently than it would otherwise. For example, Crawley has a reduced opportunity of using wind turbines in the countryside adjacent to the airport and other renewable technologies must be considered. Gatwick Airport's published Scope 1 and 2 emissions contribute 24% of the business and commercial emissions in Crawley

borough and 13% of total emissions (excluding aircraft movement, as these are considered on a national level).

#### **Sustainable Design and Construction Chapter Consultation Questions:**

- How do you think new developments can be designed in order to reduce their emissions and mitigate climate change?
- What types of new developments offer opportunities to improve the environmental performance of buildings in Crawley?
- What types of low- and zero-carbon energy sources are most appropriate in Crawley?
- Would you like to see these introduced?
- What steps does Crawley need to be taking now in order to achieve carbon neutrality by 2050?
- What measures would you prioritise?

### **Local Plan Policies**

#### **Sustainable Design and Construction**

- 14.8 The government has pursued progressive improvements to the environmental sustainability and energy efficiency of dwellings through changes to the building regulations and the development of national technical standards. The council has a long term aspiration to be carbon neutral by 2050 and, therefore, supports the introduction of national standards through building regulations. In line with the March 2015 Ministerial Statement, the council recognises Crawley as having the spatial characteristics in place that warrant the stipulation of specific policies in regard to energy and water efficiency and, in regard to water targets, to be able to trigger the use of the tighter operational standards<sup>58</sup>. The need to address climate change at a local level has also been supported throughout consultations for the Local Plan and in its evidence base.
- 14.9 Crawley's compact urban nature combined with the significant levels of development expected over the coming years present an opportunity for Crawley to minimise its carbon emissions in an efficient manner. Currently energy use in buildings makes up a significant portion of the carbon emissions generated within Crawley. Domestic buildings accounted for 24.1% of Crawley's overall emissions in 2016, and industrial and commercial buildings for 37.9%, with transport accounting for the remaining 40%<sup>59</sup>. Even before this energy has reached the consumer, energy wasted in the form of transfer and distribution losses has resulted in additional emissions. However, due to the borough's characteristics this wasted energy can be captured for the benefit of others, and this will result in Crawley's overall emissions being reduced.
- 14.10 Crawley was mainly constructed between 1950 and 1990, when sustainable development was not a priority, and many of the town's buildings consequently perform poorly in terms of their energy efficiency. Added to this fuel poverty has affected between one in twenty and one in twelve Crawley households between 2011-16. The improvement of existing buildings to ensure everyone has access to affordable warmth is, therefore, a high priority.
- 14.11 Actions to reduce emissions from energy use in buildings are most cost effective when undertaken during construction or renovation works. As such, development

<sup>58</sup> Planning Update March 2015: Written Ministerial Statement (March 2015)

<sup>59</sup> 2005 to 2016 UK local and regional CO2 emissions (2018) Department for Business, Energy & Industrial Strategy (hereafter BEIS).

projects present the most appropriate and effective opportunity to mitigate the climate change impact of the borough. Therefore, the following hierarchy should be adopted by all development within the borough:

Be Lean – *use less energy*

Be Clean – *use low carbon energy sources*

Be Green – *use renewable energy*

14.12 A number of objectives have been established that all developments are expected to achieve to ensure the borough remains a sustainable place in the coming years.

### Strategic Policy SDC1: Sustainable Design and Construction

New-build homes will be required to meet whichever of the following standards is more efficient in respect of carbon dioxide emissions:

- a) a reduction of at least 19% against the Target Emission Rate (TER) set by the 2013 Edition of the 2010 Building Regulations (Part L);
- b) a new mandatory national emissions standard, introduced via Building Regulations or otherwise.

New non-domestic buildings will be required to undergo BREEAM certification and achieve the ‘minimum standards’ for BREEAM Excellent within the Energy and Water categories, except where it is demonstrated that this is not technically feasible.

All development, including the alteration and extension of existing buildings, should respond to the issue of climate change in accordance with the objectives set out in the following table:

		SDC1 Sustainability Objective Number
Mitigate climate change using the following Energy Hierarchy:		
Be Lean	Take an active approach to reducing the development’s need to consume energy.	I.
	Look at ways to improve the existing building when adding improvements or extensions.	II.
	Minimise the amount of carbon emitted throughout the implementation and construction process and ensure any existing embedded carbon onsite is retained.	III.
Be Clean	Consider the establishment of district energy networks within heat priority areas or near potential sources of waste energy and consider connection or futureproofing developments for connection (see Policy SDC2).	IV.
Be Green	Utilise renewable and low carbon energy technologies, including solar energy, where appropriate.	V.
Adapt to climate change impact affecting Crawley as follows:		
Tackle the serious water stress in the borough (see Policy SDC3).		VI.
Cope with future temperature extremes, and mitigate the potential of the development to increase the impact of heatwave events, in accordance with the cooling hierarchy: <ul style="list-style-type: none"> <li>• Minimise internal heat gain through passive design;</li> <li>• Design to enable passive ventilation (e.g. cross ventilation);</li> <li>• Provide mechanical ventilation;</li> <li>• Provide active cooling (with priority given to lowest carbon systems).</li> </ul>		VII

All proposals involving the types of development listed below must be supported by a Sustainability Statement detailing the performance of the development against these objectives, including proposed approaches to achieving compliance with parts G and L of the Building Regulations:

- Creation of a dwelling (including by conversion);
- Creation of 100sqm or more of new-build floorspace;
- Extension of a building which already comprises 1000sqm or more;
- The following changes of use, where cumulatively affecting 100sqm or more:
  - Non-A-class to A-class;
  - Non-C-class to C-class;
  - Non-D-class to D-class.

Residential developments including 10 or more new homes or incorporating a site area of 0.5 hectares or more will be required to implement a recognised quality regime to ensure that 'as built' environmental performance matches the calculated design performance.

Further details on how these objectives can be addressed can be found in the Planning and Climate Change SPD.

### **Reasoned Justification**

- 14.13 *The NPPF states that planning should: 'support the transition to a low carbon future in a changing climate', and help to 'shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience'. It should 'encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure'. New development 'should be planned for in ways that:*
- a) avoid increased vulnerability to the range of impacts arising from climate change...*
  - b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the government's policy for national technical standards'.*
- 14.14 *The NPPF further states that 'to help increase the use and supply of renewable and low carbon energy and heat, plans should:*
- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);*
  - b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and*
  - c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems...'<sup>60</sup>.*
- 14.15 *The NPPF<sup>61</sup> also requires local plans to pursue 'opportunities for net gains' across the economic, social and environmental objectives which define sustainable development.*
- 14.16 *A number of borough-wide issues and opportunities have been identified in the evidence base and these form the objectives that all development is expected to address in this Policy.*
- 14.17 *Development should take an active approach to reducing a development's need to consume energy. This is paramount to tackling climate change and intrinsically linked with the NPPF.*
- 14.18 *New-build dwellings will be required to achieve standards for CO<sub>2</sub> emissions equivalent to Level 4 of the discontinued Code for Sustainable Homes, pending the introduction of a more stringent Future Homes Standard, which is to be introduced by 2025 as part of the government's 'mission to at least halve the energy use of new*

<sup>60</sup> National Planning Policy Framework, paragraphs 148-151 (2019) MHCLG

<sup>61</sup> National Planning Policy Framework, paragraphs 8 and 32 (2019) MHCLG

*buildings by 2030<sup>62</sup>. The Code Level 4 equivalent represents a recognised standard which is consistent with the Ministerial Statement of 25 March 2015, and with the government's policy for national technical standards<sup>63</sup>.*

- 14.19 *Existing buildings within the borough are responsible for a large proportion of our carbon emissions so improvements to all of these buildings are essential to curb our emissions over the Plan period. Therefore, this Policy relates to all development including alterations and extensions to existing buildings, as well as new developments. This will also help to tackle the high level of local fuel poverty by ensuring affordable warmth within the borough.*
- 14.20 *Existing buildings contain embedded carbon; this is carbon that was emitted to construct it. It is vital that this already emitted carbon is not wasted through the needless demolition of structures so applications will be required to demonstrate how onsite embedded carbon has been retained.*
- 14.21 *Due to Crawley's compact urban nature, the use of district energy networks can ensure a low carbon future for the borough as required by the NPPF. Ensuring development utilises these networks is of particular importance to ensure they are a success.*
- 14.22 *Crawley Borough Council has assessed<sup>64</sup> the likely opportunities and constraints of a number of technologies across the borough. High radiant energy, a plentiful supply of a biomass fuel, and district energy networks have been identified as the most suitable renewable energy resources available. It is therefore appropriate to utilise renewable and low carbon energy technologies where appropriate.*
- 14.23 *The borough is identified as falling within an area of serious water stress and as such development is expected to address this issue by achieving a better than standard level<sup>65</sup>.*
- 14.24 *Crawley is expected to experience increased frequency and severity of heatwave events. Therefore, ensuring that new buildings will be fit for purpose under greater temperature extremes and minimising the contribution that new developments have towards the urban heat island effect will help manage this impact.*
- 14.25 *In order to address the recognised 'performance gap' between the modelled performance of buildings and their actual performance, the policy requires major residential developments to demonstrate that they have acted to ensure that sustainability and construction standards specified at the design stage are carried through in the implementation of the development.*
- 14.26 *This Policy will make a substantial contribution to addressing the requirements set out in the NPPF in respect of climate change, thereby contributing towards the social and environmental objectives defining sustainable development. It will also positively contribute towards the economic objective, as buildings with better environmental performance will have lower energy costs, reduced requirements for retrofitting arising from tighter regulations in the future, and increased marketability<sup>66</sup>. They will also promote investment and employment opportunities in green industries.*

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<sup>62</sup> Spring Statement 2019: Written Ministerial Statement, 13 March 2019

<sup>63</sup> Planning Update March 2015: Written Ministerial Statement, March 2015; Government Response to the draft Revised National Planning Policy Framework consultation, p.48 (2018) MHCLG

<sup>64</sup> Decentralised Energy Study (2011) HurleyPalmerFlatt

<sup>65</sup> Water Stressed Areas – Final Classification (July 2013) Environment Agency

<sup>66</sup> The Business Case for Green Building: A Review of the Costs and Benefits for Developers, Investors and Occupants (2013) World Green Building Council; Capturing the value of sustainability: Identifying the links between sustainability and business value (2018) UK Green Building Council

### Policy SDC1: Sustainable Design and Construction Consultation Questions:

- Is this Policy consistent with national policy requirements for addressing the challenge of climate change in Local Plans?
- Is the introduction of a mandatory requirement for CO2 emission reductions in new dwellings in excess of Building Regulations requirements justified and appropriate?
- Would a requirement setting a proportion of energy in new dwellings to be provided by renewable/ low carbon sources (sometimes referred to as a 'Merton Rule') represent either a better alternative or an appropriate addition to the requirement for CO2 emissions reductions?
- Do the minimum Energy and Water requirements for BREEAM 'Excellent' represent an appropriate standard for new non-domestic buildings? If not, what (if any) benchmark or requirement should be used?
- Is the approach to climate change mitigation and adaptation detailed in the table appropriate? If not, how could it be improved?
- Are the thresholds for requiring a Sustainability Statement appropriate? If not, how could they be improved?

### District Energy Supply

- 14.27 A large proportion of Crawley's energy is currently supplied from the National Grid as a centralised system. Power stations generate and distribute this energy across long distances to homes and businesses. This is an inefficient and carbon intensive process due to waste heat and distribution losses. Thus only 45 per cent of the energy used to generate electricity in the UK in 2017 reached end users in the form of electricity<sup>67</sup>. At the same time, nearly half of the energy used in the UK is for heating<sup>68</sup>. Therefore, the use of waste heat from electricity production can help shift energy supply to more affordable lower carbon sustainable sources.
- 14.28 District Energy Networks are designed to distribute energy, such as heating, cooling and electricity across a local area. Networks typically consist of underground pipes and/or cables connecting local energy sources to buildings. Energy sources can include plant that generates electricity and uses the waste heat from this process to supply the network. This is known as Combined Heat and Power (CHP) and is a form of efficient "decentralised" energy production. District Energy Networks can be supplied with many fuel sources, including renewables or waste heat. Energy supplies to District Energy Networks can, therefore, be flexible in regard to using different sources and different technologies both now and in the future.
- 14.29 Crawley, due to its relatively dense and compact urban character, its neighbourhood-based layout, and the quantity of new development expected over the coming years has a significant opportunity to develop District Energy Networks. Such networks could provide affordable warmth to residential and commercial buildings, tackling fuel poverty and improving our energy security. Studies commissioned by Crawley Borough Council have identified a number of Priority Areas within the borough where District Energy Networks are likely to be most viable in the short term.

### Strategic Policy SDC2: District Energy Networks

The development of district energy networks and associated infrastructure is encouraged and should be approved unless it results in significant adverse impacts on the environs.

<sup>67</sup> Digest of UK Energy Statistics (DUKES) 2018, p.112 (2018) BEIS

<sup>68</sup> Energy Consumption in the UK (ECUK) 2018, Data Table 1.04 (2018) BEIS

Priority areas for the delivery of District Energy Networks are identified on the Local Plan Map.

Any major development within the borough, and all development proposals within a priority area for District Energy Networks that would involve the creation of a new dwelling or the creation of over 1000sqm of internal floorspace, must incorporate an energy strategy developed in accordance with the following hierarchy:

- i. where a network is in place in the immediate area: connect to an existing District Energy Network;
- ii. where a network is not yet in place:
  - a) incorporate within the development a system for supplying energy to any surrounding existing or planned buildings. Any system installed should be compatible with a wider district energy network and developments should ensure that connection to a wider network is facilitated in the future through good design and site layout; or
  - b) include site-wide communal energy systems; or
  - c) demonstrate 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.
- iii. where a development has demonstrated that the preceding options cannot be achieved, due to technical feasibility, or due to site or development specifics, an alternative approach to incorporating low- or zero-carbon technology energy may be justified, on a case-by-case basis. These developments will be required to supply a proportion of their energy needs from low- or zero-carbon sources located on or near the site as follows:
  - a) For major developments within a DEN priority area: at least 20%;
  - b) For major developments outside a DEN priority area, or minor developments within a DEN priority area including the creation of a new dwelling: at least 10%.

Where a connection to an existing District Energy Network is proposed, the council may secure the implementation of this by means of a planning obligation.

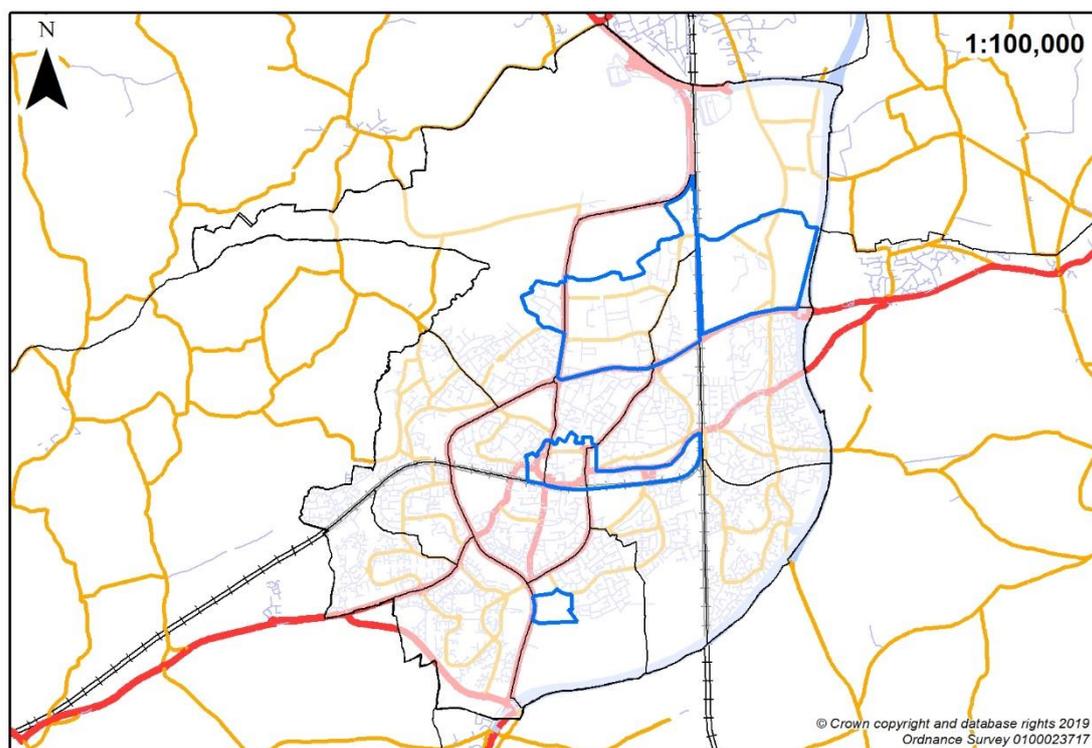
All development within the categories identified above must be supported through the submission of a Sustainability Statement in compliance with the Planning and Climate Change SPD.

### **Reasoned Justification**

14.30 *Crawley Borough Council has conducted a thorough assessment of the potential use of decentralised energy networks across the borough. This has included work by West Sussex County Council, the Energy Centre for Sustainable Communities, and HurleyPalmerFlatt consultancy.*

14.31 *When considering the opportunities for reducing CO2 emissions through the supply of low carbon heat, District Heating (DH) was identified as an alternative method of supplying heat to buildings, using a network of super insulated pipes to deliver heat to multiple buildings from a central heat source, such as a Combined Heat and Power (CHP) plant. A CHP plant is essentially a local, smaller version of a traditional power station but by being combined with heat extract, the overall efficiency is much higher (typically 80% - 85%). Whilst the electrical efficiency of smaller CHP systems is lower than large scale power generation, the overall efficiencies with heat use are much higher resulting in significant CO2 reductions.*

- 14.32 A 'heat map' for Crawley has been created that identifies density of heat demand across the borough, the assessment identified a number of areas where the development of district heating schemes should be actively encouraged. These are identified as Priority Areas on the Local Plan Map. However, District Energy Networks are encouraged throughout the borough, including outside of the identified areas.
- 14.33 The NPPF directs local plans 'to identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy systems'. This further applies to the goal of 'co-locating potential heat customers and suppliers'. Further, local planning authorities should 'expect new developments to comply with any development plan policies on local requirements for decentralised energy supply, unless it can be demonstrated by the applicant, having regard to the type of development involved, that this is not feasible or viable'<sup>69</sup>. Given the complexity of decentralised energy, the council encourages early pre-application discussions.
- 14.34 The approach of seeking to make new dwellings capable of connecting to future DENs is consistent with the approach outlined in the government's Clean Growth Strategy of April 2018, which announces the intention 'to consult on strengthening energy performance standards for new and existing homes under building regulations, including futureproofing new homes for low carbon heating systems'.



 Priority Areas for District Energy Networks (Policy SDC2)

#### Policy SDC2: District Energy Networks Consultation Questions:

- Is it justified and appropriate for this Policy to promote the development of District Energy Networks in Crawley?
- Are the District Energy Network priority areas identified in the policy justified and appropriate? If not, how should they be amended?

<sup>69</sup> National Planning Policy Framework, paragraphs 151 and 153 (2019) MHCLG

- Are the thresholds for applying this policy to new developments appropriate? If not, how could they be improved?
- Is the hierarchy of approaches to using decentralised/ communal energy detailed in the policy appropriate? If not, how could it be improved?
- Are the requirements for use of alternative renewable/ low carbon energy sources where decentralised energy is not feasible appropriate and justified?
- Is there any wording in this policy which requires further explanation, either within the policy or elsewhere?

## Tackling Water Stress

- 14.35 The South East, including Crawley, is an area of serious water stress<sup>70</sup>. It is, therefore, important that more stringent water conservation measures need to be required from housing and commercial property development in Crawley.
- 14.36 In addition, changing climate conditions are expected to further aggravate water stress in Crawley. Drought is expected in increased frequency and severity and will put additional strain on reservoir and groundwater levels. Extreme rainfall events are also expected to become more frequent and to be more severe. Although seemingly counter-intuitive: increased risk of extreme rainfall can actually further aggravate water stress as most of this water does not soak through to recharge groundwater reserves but instead becomes surface water run-off – increasing the risk of flooding.
- 14.37 One method of helping to manage flood risk is to reduce stock levels in reservoirs (at the cost of increasing water stress). This is so that there is spare capacity that can be used to store excess surface water, during extreme rainfall events, that would otherwise cause flooding. Water efficiency is, therefore, a key consideration for development in Crawley.

### Strategic Policy SDC3: Tackling Water Stress

Crawley is situated within an area of serious water stress, and development should, therefore, plan positively to minimise its impact on water resources and promote water efficiency.

Proposals involving the creation of dwellings will be required to at least meet the Building Regulations optional requirement for tighter water efficiency, and should, where feasible, achieve a more advanced target of 100 litres/person/day. A tighter target of 80 litres/person/day should be met for significant, strategic scale developments.

The existing Building Regulations ‘optional’ requirement (of 110 litres/person/day) will be superseded by any tighter national standard applicable in an area of serious water stress introduced during the Local Plan period.

New non-residential buildings will be required to meet the minimum standards for BREEAM ‘Excellent’ within the Water category.

Non-residential extensions and changes of use which are required to submit a Sustainability Statement in accordance with Policy SDC1 will be required to achieve water efficiencies equivalent to the minimum Water standards for BREEAM ‘Excellent’, unless this is shown to be unfeasible.

Applicants must demonstrate how they have achieved the requirements of this Policy within their Sustainability Statement as required by Policy SDC1.

<sup>70</sup> Water Stressed Areas – Final Classification (July 2013) Environment Agency

### **Reasoned Justification**

- 14.38 *The NPPF requires local planning authorities to take ‘a pro-active approach to mitigating and adapting to climate change, taking into account the long term implications for... water supply’<sup>71</sup>. Ensuring that new development is highly water efficient and that, where appropriate, it makes use of rainwater harvesting and/or grey water recycling for uses which do not require water to be potable (such as WC flushing), will help to minimise the impact of development on water stress in the region.*
- 14.39 *Crawley’s planning policy on water efficiency requires all new dwellings, including the subdivision of existing buildings into multiple dwellings, to achieve the most stringent water efficiency requirements given that it is identified as an area of serious water stress. The current optional requirement set out in Building Regulations<sup>72</sup> is 110 l/p/d (105 l/p/d with an additional 5 l/p/d for external use). Given the robust nature of evidence supporting the Crawley Borough Local Plan, including the Gatwick Water Cycle Study, and support from the Environment Agency, a tighter water efficiency standard, of 100 l/p/d, is considered the necessary level for Crawley. For significant scale developments, such as urban extensions to Crawley an even tighter water efficiency standard, of 80 l/p/d, is expected to be met, reflecting the greater opportunities to take a more holistic approach to sustainable water and energy provision at this scale.*
- 14.40 *For non-domestic development there is currently no nationally applied standard for water efficiency of buildings (only minimum performance requirements for individual water using fixtures). However, BREEAM sets out standards for minimum water performance of such buildings. This is done using the BREEAM water calculation method to assess the percentage reduction in internal potable water usage of the proposed building performance as compared to that of a notional building, using standardised assumptions for occupant behaviour.*
- 14.41 *Given the findings of the council’s Water Cycle Studies and the work undertaken in partnership with the Environment Agency as an area of serious water stress, non-domestic developments are required to install water meters and to meet the highest water efficiency requirements. The Policy requires non-residential development to equal or exceed BREEAM Excellent requirements, which require that there is a 25% reduction in potable water use.*
- 14.42 *The EU Water Framework Directive<sup>73</sup> establishes a framework for the protection of inland surface waters (rivers and lakes), transitional waters (estuaries), coastal waters and groundwater. The government has stated that the environmental protections arising from this and other EU legal instruments will remain in place after the UK leaves the European Union, and the 2018 ‘25 year Environment Plan’ has announced the intention to improve ‘at least three quarters of our waters to be close to their natural state as soon as practicable’<sup>74</sup>. The council supports this work through the proper and sensible management of water in all new development.*
- 14.43 *The council will continue to work alongside developers, key stakeholders and the Environment Agency with regard to water supply and demand considerations, as well as any infrastructure requirements, and will assist in ensuring that the highest standards for water efficiency are considered for all development within the borough. Further information will be provided in the Planning and Climate Change SPD.*

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<sup>71</sup> National Planning Policy Framework, paragraph 149 (2019) MHCLG

<sup>72</sup> Building Regulations Approved Document G (Sanitation, Hot Water Safety and Water Efficient)

<sup>73</sup> The Water Framework Directive, European Union (Directive 2000/60/EC of the European Parliament and of the European Council of 23 October 2000)

<sup>74</sup> A Green Future: Our 25 Year Plan to Improve the Environment, p.25 (2018) Department of the Environment, Food and Rural Affairs

**Policy SDC3: Tackling Water Stress Consultation Questions:**

- Is the 'optional' building regulations standard for water efficiency in new dwellings still appropriate and justified in Crawley?
- Is it reasonable and appropriate to set a more advanced aspirational target of 100 or 80 litres/person/day?
- Is it appropriate and reasonable for the Policy to anticipate any future tightening of water efficiency standards by the government in relation to new dwellings?
- Are the BREEAM requirements in respect of new non-residential buildings and extensions/ changes of use appropriate and justified?

## Environmental Protection

- 15.1 Crawley is unique in comparison to other towns in the region. It is mainly urban in character, is well linked to the motorway network, contains a major international airport at Gatwick, and is home to one of the largest employment areas in the south east at Manor Royal and County Oak. These aspects have combined to make Crawley a leading economic driver in the sub-region, but can also result in pollution impacts which need to be mitigated and managed.

### Chapter Content

- 15.2 This chapter sets out policies to guide the relationship between development proposals and local, national and global environmental protection.

### The Key Issues

- 15.3 With an increasing population and the consequent need for development, the impact on the natural environment is a key issue. The planning policies in this chapter will ensure that Crawley's environment is protected as Crawley grows and changes over the next 15 years.
- 15.4 The borough's water environment provides an important leisure and visual role in a predominantly urban area, but several high profile flood events have highlighted the need to manage flood risk. For these reasons it is important that development is planned with flood risk in mind, both in terms of protecting Crawley residents, and through ensuring that flood risk is not increased elsewhere. Crawley falls entirely within the upper reaches of the River Mole catchment, which is situated on clay and so responds very rapidly to rainfall, and localised surface water flooding is also an issue. There are several boroughs within the River Mole catchment downstream of Crawley, and it is important to ensure that development within Crawley is carefully managed.
- 15.5 Crawley and its surrounds have been identified as an area of significant change and growth. Given its geographical location at the heart of the Gatwick Diamond and the significant amount of both commercial and residential growth expected throughout the life of the Local Plan, there is a need to consider the impact on the local environment and to plan for sustainable growth. This is exacerbated by the resultant in-commuting to the area and regional focus of growth that would otherwise be experienced across a number of authorities. This is also supported by the fact that the main commercial area, Manor Royal is currently responsible for 28% of the town's carbon emissions. This will increase if growth for the Gatwick Diamond area is focused there.
- 15.6 Given the proximity of the international airport, there are a number of local impacts that would affect how climate change is dealt with. From the increase in traffic movements in the local area, to the restrictions in terms of building heights and safeguarding, the operation of the airport requires the Local Authority to act differently than it would otherwise. For example, Crawley has a reduced opportunity of using wind turbines in the countryside adjacent to the airport and other renewable technologies must be considered. Gatwick Airport's published Scope 1 and 2 emissions contribute 24% of the business and commercial emissions in Crawley borough and 13% of total emissions (excluding aircraft movement, as these are considered on a national level).

- 15.7 The relationship between noise sources and noise sensitive development is a key issue in the town, in particular due to the location of Gatwick Airport, the M23 motorway and large industrial areas.

#### Environmental Protection Chapter Consultation Questions:

- Do you know of any areas of Crawley particularly affected by certain types of pollution?
- Are there any types of pollution which you would like to see better controlled? How do you think this could be achieved?
- More stringent criteria are proposed to reduce the number of people exposed to unacceptable noise from aircraft. What are your thoughts on this approach?

### Local Plan Policies

#### Development and Flooding

- 15.8 Crawley's water environment has long been an important planning consideration, particularly from a perspective of managing flood risk, and will continue to remain so in planning for Crawley's future. The borough falls entirely within the upper reaches of the River Mole catchment, and the town's close proximity to the catchment has meant that several areas are identified by the Environment Agency as being at risk of flooding. The northward flow of the Upper Mole towards the Thames also has flood implications for Gatwick Airport and neighbouring authorities, in particular Reigate and Banstead. River flooding is not the only source of flooding; Crawley is at the highest risk of surface water flooding in West Sussex. Sewer and groundwater flooding are also important planning considerations.
- 15.9 It is, therefore, vital that development is planned sustainably with flood risk from all sources in mind, particularly in terms of protecting current and future users of development, and ensuring that proposals do not increase flood risk elsewhere. The NPPF and supporting PPG: *Flood Risk and Coastal Change* categorises different development types according to their susceptibility to flood risk. Through applying the sequential test, the most vulnerable development types should be directed to the areas of lowest flood risk.

#### Strategic 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:

- i. be directed to areas of lowest flood risk, as identified on the Environment Agency Flood Map for Planning, having regard to its compatibility with the proposed location in flood risk terms, and, where required, demonstrating that the sequential and exceptions tests are satisfied;
- ii. where located in Flood Zones 2 or 3, and for all major development in Flood Zone 1, demonstrate through a Flood Risk Assessment how appropriate mitigation measures will be implemented as part of the development to ensure flood risk is made acceptable on site, and is not increased elsewhere as a result of the development. Householder applications should refer to Policy EP2;
- iii. reduce peak surface water run-off rates and annual volumes of run-off for development through the effective implementation, use and maintenance of SuDS, unless it can be demonstrated that these are not technically feasible or financially viable. Applicants should refer to the West Sussex Lead Local Flood Authority Policy

for the Management of Surface Water and the Climate Change SPD for further guidance.

### **Reasoned Justification**

- 15.10 *Flooding is a natural process that can happen at any time in a wide variety of locations, posing a risk to life, property and livelihoods. The risk of flooding posed to properties within Crawley arises from a number of sources including river flooding, localised runoff and sewer flooding.*
- 15.11 *Development in Crawley has the potential to increase the likelihood of flood risk if it is not carefully managed. Development on floodplains can play a significant role in increasing flood risk, particularly through placing people and properties in areas that are at a heightened risk of flooding. Climate change impacts are also expected to increase the risk of flooding over the coming decades, with an increase in the frequency of wet, mild winters anticipated. Therefore, it is essential that planning decisions are informed by, and take due consideration of, the flood risk posed to (and by) future development.*
- 15.12 *Flash flooding from surface water run-off and/or sewer overload has also been an issue across the borough following heavy localised rainfall events. It is a specific issue across Crawley as the underlying clay soil and density of urban development reduces permeability and increases the levels and speed of surface water run-off. This can result in localised surfaces flooding, and can lead to rivers exceeding their storage capacity more quickly, often resulting in 'flash flooding'.*
- 15.13 *The NPPF requires local planning authorities to take a pro-active approach to managing impacts associated with climate change, including flood risk. The risk of a flood event is a function of both the probability that the flood will occur and the consequence to the community as a direct result of the flood. To minimise risks to property, inappropriate development should be avoided in areas which are at greatest risk of flooding, and directed to sequentially preferable areas of lowest risk. Where development is necessary in areas of flood risk, care should be taken to ensure it can be made safe without increasing flood risk elsewhere.*
- 15.14 *To guide the location of development, Planning Practice Guidance: Flood Risk and Coastal Change (DCLG, 2014) identifies the different levels of flood risk, ranging from Flood Zone 3b (functional floodplain), the land at greatest probability of flooding to Flood Zone 1, the lowest probability. Table 2 of the Planning Practice Guidance categorises different development types according to their vulnerability to flood risk, with Table 3 outlining which development types are suitable within each flood zone.*
- 15.15 *To identify the extent to which land is at risk of flooding, applicants will be required to refer to the Environment Agency Flood Map for Planning. Based on this mapping, Crawley is delineated into the following Flood Zones:*
- **Flood Zone 3b Functional Floodplain:** *land where water has to flow or be stored in times of flood*
  - **Flood Zone 3a High Probability:** *Land assessed as having a 1% AEP (1 in 100 chance in any year) or greater of flooding*
  - **Flood Zone 2 Medium Probability:** *Land assessed as having between a 1% AEP (1 in 100 chance in any year) and 0.1% AEP (1 in 1000 chance in any year) of river flooding.*
  - **Flood Zone 1 Low Probability:** *Land assessed as having a less than 0.1% AEP (1 in 1000 chance in any year) of river flooding in any year (i.e. 0.1% AEP).*
- 15.16 *The Environment Agency Flood Map for Planning does not delineate Flood Zone 3 into its sub-designation of Zones 3b and 3a. Therefore as agreed with the*

*Environment Agency, within Flood Zone 3 all undeveloped areas and areas of open space will be treated as Flood Zone 3b (Functional Floodplain).*

- 15.17 *The NPPF recognises residential development as a ‘more vulnerable’ use which should be directed to Flood Zone 1 or Flood Zone 2, subject to demonstrating compliance with the sequential test and the acceptability of development through a Flood Risk Assessment. Residential development on land falling within Flood Zone 3a will only be acceptable where it can be demonstrated that the NPPF exceptions test is satisfied.*
- 15.18 *All housing sites identified in Local Plan Policy H2 are considered to be appropriate locations in terms of flood risk. This assessment follows early engagement on the Local Plan with the Environment Agency and West Sussex County Council (WSCC) which provided information on flood risk levels across the Crawley area from rivers, surface water and groundwater. Of the sites allocated by the Local Plan for residential development, three sites are situated in areas partially affected by Flood Zone 2 and/or Flood Zone 3a; these being: Breezehurst Drive, Bewbush; Bewbush West Playing Fields (Henty Close), Bewbush; and Land adjacent Desmond Anderson, Tilgate. The principle of development at each of these sites has been agreed by the Environment Agency, subject to applicants demonstrating, through a Flood Risk Assessment, that proposals are acceptable in terms of flood risk.*
- 15.19 *West Sussex County Council (WSCC) is the Lead Local Flood Authority (LLFA), meaning it is a statutory consultee on planning applications where flood risk is a consideration. In its capacity as LLFA, WSCC has published West Sussex Lead Local Flood Authority Policy for the Management of Surface Water (updated November 2018), which sets out the requirements for drainage strategies and surface water management provisions associated with applications for development. In responding to flood risk as part of the planning application process, applicants should meet the requirements set out by WSCC in this document.*

#### **Policy EP1: Development and Flood Risk Consultation Questions:**

- Is the policy sufficiently clear in setting out when a Flood Risk Assessment or Flood Risk and Resilience Statement is required, and the differences between these?
- Do you have any other comments on the draft policy?

#### **Flood Risk Development Guidance**

- 15.20 Some existing residential dwellings in Crawley are situated in areas of Medium or High flood risk. It is recognised that the occupiers of these properties may wish to apply for planning permission to undertake small-scale householder applications, for example ground floor residential extensions. This type of development, though of a relatively small-scale, still has potential to take up flood storage, and will itself likely be vulnerable to flooding. Policy EP1 (part iii) recognises that in these situations, a full Flood Risk Assessment will not be required. Rather, householder applications should be accompanied by a proportionate Flood Risk and Resilience Statement, which demonstrates how any lost flood storage will be mitigated, and how the proposed development will be made resilient in flood risk terms.

#### **Non-Strategic Policy EP2: Flood Risk Development Guidance**

For householder applications in Flood Zones 2 or 3, a full Flood Risk Assessment is not required. Instead, a Flood Risk and Resilience Statement must be provided. This will be required to, on a proportionate basis, demonstrate that:

- i.) Any loss of flood storage resulting from the development will be mitigated; and
- ii.) The development has been designed to ensure that it is resilient to the level of flood risk posed.

### **Reasoned Justification**

15.21 *It is considered that a specific approach for householder applications will simplify the planning process for such small-scale applications, whilst still ensuring that matters of flood storage and resilience, where required, is adequately addressed.*

### **Policy EP2: Flood Risk Development Guidance Consultation Questions:**

- Is a separate policy for householder applications in relation to flood risk justified?
- Is it sufficiently clear from the policy when this policy applies and what is required from planning applications?

### **Managing Pollution**

15.22 Although Crawley is fortunate in having few areas that are subject to serious pollution, managing the impacts of environmental pollution remains an important objective. Although the principal mechanisms for achieving this are through the regulatory functions of Environmental Health, taking steps to facilitate a reduction of pollution and ensure that proposals are safe for future site users is still a legitimate matter for planning control.

### **Strategic Policy EP3: Pollution Management and Land Contamination**

To prevent unacceptable risks from environmental pollution and land contamination, development, including extensions and intensification of existing uses, will be permitted where the proposed use:

- a) would not lead to a material increase (including cumulative increase) in levels of pollution or hazards, or where impacts can be appropriately mitigated to ensure impacts are controlled, and as far as possible reduced; and
- b) is appropriate to its location in that it would not result in unacceptable disturbance or nuisance to the amenity of adjacent land uses and occupiers.

Where a site is known or suspected to be at risk from contaminants or materials that present a hazard to health, information must be provided detailing the methodology through which risks will be addressed, and ensuring the treatment and/or removal of all such contaminants and materials prior to the commencement of development.

### **Reasoned Justification**

15.23 *Conservation and enhancement of the natural environment and the reduction of pollution is one of 17 key planning principles set out in the NPPF. The government requires the planning system to prevent new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution, or land instability. The NPPF also requires that Local Plans aim to minimise pollution and other adverse effects on the natural environment and should encourage re-use of despoiled, degraded, or contaminated brownfield land, where appropriate, through remediation and mitigation.*

15.24 *The NPPF recognises that to prevent unacceptable risks from pollution and land instability, planning policies should ensure that new development is appropriate for its*

*location, taking into account the effects (including cumulative effects) of pollution from development, or that arising as a result of development.*

#### **Policy EP3: Pollution Management and Land Contamination Consultation Questions:**

- Is this policy sufficiently clear and justified?
- Is there anything else this policy should include?
- Should the policy seek a financial contribution to offset the cumulative air quality impacts of development? To what type of development should this apply?

### **Development and Noise**

15.25 Due to the urban nature of Crawley noise levels vary from relatively quiet areas within Crawley's large parks to much noisier areas close to the M23 and Gatwick Airport. Unacceptable levels of noise can be a cause of health and stress related problems, amenity issues, and can result in negative impacts on productivity and learning. For these reasons it is fundamental that the relationship between noise sources and noise sensitive development is effectively and appropriately managed through the Local Plan. Key to this approach will be a methodology for separating noise sensitive developments from noise generating sources.

#### **Strategic Policy EP4: Development and Noise**

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 EP4 should be read in conjunction with the Local Plan Noise Annex.

##### A. Noise Sensitive Development

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.

Noise sensitive uses proposed in areas that are exposed to significant noise (SAOEL) from existing or future industrial, commercial or transport (air, road, rail and mixed) sources will be permitted where it can be demonstrated 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. Proposals that would expose future users of the development to unacceptable noise levels will not be permitted.

For transport sources other than aviation, the Unacceptable Adverse Effect is considered to occur where noise exposure is above 66dB  $L_{Aeq,16hr}$  (57dB  $L_{Aeq,8hr}$  at night).

For aviation transport sources the Unacceptable Adverse Effect is considered to occur where noise exposure is above 60dB  $L_{Aeq,16hr}$ .

##### B. Noise Generating Development

Noise generating development will only be permitted where it can be demonstrated that nearby noise sensitive uses (as existing or planned) will not be exposed to noise impact that will adversely affect the amenity of existing and future users. Proposals will adhere to standards identified in the Local Plan Noise Annex to establish if the proposal is acceptable in noise impact terms, and will be required to appropriately mitigate noise impacts through careful planning, layout and design. Development that would expose users of noise sensitive uses to unacceptable noise levels will not be permitted.

### C. Noise Impact Assessment

A Noise Impact Assessment will be required to support applications where noise sensitive uses are likely to be exposed to significant or unacceptable noise exposure. The Noise Impact Assessment will:

- i. assess the impact of the proposal as a noise receptor or generator as appropriate; and
- ii. demonstrate in full how the development will be designed, located, and controlled to mitigate the impact of noise on health and quality of life, neighbouring properties, and the surrounding area.

In preparing a Noise Impact Assessment, applicants will adhere to Planning Noise Advice Document: Sussex (2015 or latest revision) for further guidance.

### D. Mitigating Noise Impact

Where proposals are identified as being subject to significant or unacceptable noise impact, either through noise exposure or generation, the best practical means must be employed to mitigate noise impact to an acceptable level.

### **Reasoned Justification**

- 15.26 *To assist in the interpretation of Local Plan Policy, guidance is set out in the Local Plan Noise Annex to inform the use of Policy EP4 in planning applications and decisions. Reference should also be made to the Local Plan Noise Annex, which delineates the estimated noise contours associated with a possible second wide-spaced runway at Gatwick Airport. The noise contours shown in the Local Plan Noise Annex reflect the latest published by Gatwick Airport and approved by the Civil Aviation Authority (CAA).*
- 15.27 *Crawley is one of 65 large urban areas in England to which the Environmental Noise Directive applies, and the Local Plan approach to managing noise has regard to Noise Action Plans produced by DEFRA to promote good health and good quality of life. Given Crawley's unique noise environment, it is considered that locally-specific guidance is needed to ensure that national objectives are met, whilst ensuring that an approach that is consistent with adjoining local planning authorities is progressed.*
- 15.28 *The NPPF requires that Local Plan policies and development management decisions aim to avoid noise giving rise to significant adverse impacts on health and quality of life as a result of new development, ensuring that, where conflict does arise, impacts are, as far as possible, mitigated against and reduced to a minimum. To ensure that the Local Plan appropriately manages and mitigates against issues of noise on a consistent basis, the policy approach draws on evidence base work.*
- 15.29 *Although Planning Practice Guidance: Noise provides broad policy guidelines, it is recognised that the revoking of PPG24 (Planning and Noise) has resulted in an absence of technical guidance relating to noise. Whilst PPG24 provided guidance in relation to situations in which the onset of noise impact becomes significant, Noise Planning Policy Statement for England (2010) – identified under the noise policy of the NPPF – outlines that the Significant Observed Adverse Effect Level (SOAEL), the noise level above which significant adverse effects on health and quality of life occur, will vary depending on the situation and source of noise. For this reason, there is currently not a recognised value for SOAEL. However, given the diverse range of noise sources in Crawley (including the airport, motorway, and Manor Royal) it is considered that detailed technical guidance will be required to facilitate the interpretation of Local Plan Policy EP4.*
- 15.30 *ProPG: Planning & Noise – New Residential Development (May 2017) sets out principles of good acoustic design. It recognises the importance of designing out the*

*adverse effects of noise at an early stage, using a holistic design process that creates places that are both comfortable and attractive to live in, where acoustics is considered integral to the living environment.*

- 15.31 *Detailed technical guidance is required to fill the policy gap left by the revocation of PPG24 to provide locally specific clarity in interpreting an appropriate noise response according to source. The recently published Planning Practice Guidance: Noise<sup>75</sup> recommends that local planning authorities may produce locally specific noise guidance.*
- 15.32 *Technical guidance on noise impact is set out in the Local Plan Noise Annex. This draws upon evidence and the PPG24 Noise Exposure Categories as a technical starting point, to provide guidance in assessing the acceptability of development proposals in noise terms. As part of the Local Plan, the Noise Annex will form a material planning consideration until such a time as its content is superseded by updated technical guidance from the government.*
- 15.33 *Where a Noise Impact Assessment is required, consideration should be given to Planning Noise Advice Document, Sussex (2015 or latest revision) which has been produced on a joint basis by East and West Sussex local authorities. This has been produced to provide clear and consistent guidance as to the level of information that should be submitted with planning applications for noise generating developments or noise sensitive developments, including guidance on when it is appropriate to submit a noise report and the required contents of such a report.*

#### **Policy EP4: Development and Noise Consultation Questions:**

- Does the policy correctly define the threshold at which the Significant Observed Adverse Effect Level (SOAEL) and Unacceptable Adverse Effect Level (UAEL) occur?
- How best can the Local Plan ensure that an acceptable noise climate is achieved?

### **Air Quality**

- 15.34 Crawley is a clean, urban borough, and is fortunate in having no seriously polluted areas. However, air quality across the town can be affected by pollution from different sources including local and major road traffic, airport related activities, and industry.
- 15.35 To ensure that quality of life is protected for the people who live in and visit the town, European Legislation requires the council to monitor and assess air quality within its administrative area. Where monitoring shows that statutory air quality objectives are not being met an Air Quality Management Area (AQMA) will be declared and an Air Quality Action Plan prepared.
- 15.36 In 2013, Crawley identified its first AQMA along the A2011, Crawley Avenue, and surrounding areas. An Air Quality Management Plan is required to help address the pollution issues that have been identified. It is possible that other AQMAs may be identified over the Local Plan period, and it is important that the Local Plan is proactive in promoting good air quality. Therefore, the Local Plan seeks to ensure that so far as possible the need to designate new AQMAs is avoided, and that development does not worsen, and where possible improves, air quality.
- 15.37 To help achieve this, the Local Plan draws upon 'Air Quality & Emissions Mitigation for Sussex Authorities' (2013), produced by Sussex Air Quality Partnership and signed up to by East and West Sussex local authorities. The document seeks to improve air quality across Sussex by providing cross-authority guidance to identify

<sup>75</sup> Planning Practice Guidance: Noise (2014) DCLG

situations in which planning applications should be supported by an Air Quality Assessment to ensure any air quality impacts are appropriately mitigated.

### Strategic Policy EP5: Air Quality

Development proposals that do not result in a material negative impact on air quality will normally be permitted. In determining whether or not a development will have a material negative air quality impact, the local planning authority will refer to the criteria set out in *Air Quality and Emissions Mitigation Guidance for Sussex*.

To ensure that development is appropriate in air quality terms:

- a) Where identified in *Air Quality and Emissions Mitigation Guidance for Sussex*, development will be required to be supported by evidence detailing the air quality impact of the proposed development, and outlining an appropriate mitigation strategy that will be implemented to ensure that air quality is not materially worsened, and is where possible improved. This may be in the form of an Emissions Statement, Mitigation Statement, and/or Air Quality Statement, as appropriate.
- b) Development proposals within a declared Air Quality Management Area, will demonstrate how mitigation measures will be incorporated that help address objectives identified in the relevant Air Quality Action Plan.
- c) Development that may reasonably be considered to impact upon air quality beyond the borough boundary, will be expected to contribute towards achieving a reduction in levels of air pollution, and should demonstrate how this will be achieved through an Air Quality Assessment.

In all relevant cases, development that cannot demonstrate how material negative air quality impacts will be mitigated may be refused.

#### **Reasoned Justification**

- 15.38 *Air quality in Crawley is generally good, with most of the borough meeting air quality objectives. However, some areas are close to exceeding recommended European Union limits, and it is possible that additional AQMAs may need to be designated over the plan period. The council has responsibility to ensure that air quality does not negatively affect the residents' health or the environment, both within and beyond the borough boundary, and for this reason it is important that the Local Plan is able to contribute to the improvement of air quality.*
- 15.39 *Emerging government proposals will make local authorities directly accountable for air quality breaches if it cannot be demonstrated that steps are being taken to prevent or reduce exceedence. Therefore, the Local Plan must take into account both the presence of AQMAs and cumulative impact from individual sites when planning for development. Reflecting the NPPF emphasis on early engagement, the identification of AQMAs by the council, and requiring an Air Quality Assessment where necessary in a planning application will ensure that issues are looked into at an early stage.*
- 15.40 *Policy EP5 will prevent unacceptable risks by allowing development where it is appropriate for its location, and ensure the effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, are taken into account. By taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas, the Local Plan will ensure that any development in Air Quality Management Areas is consistent with the local Air Quality Action Plan.*

**Policy EP5: Air Quality Consultation Questions:**

- Is this policy sufficiently clear?
- Is this policy justified?
- Is there anything else this policy should include?

## Sustainable Transport

- 16.1 The retention of existing essential transport infrastructure and the provision of additional facilities and services to support new development is a key objective of the planning system. It is important to retain, and where possible enhance, opportunities for increasing active travel and public transport use, as an alternative to the car, in the borough taking into account new innovations and the need to respond to climate change.
- 16.3 It is important that the council continues to work closely with West Sussex County Council and Highways England to ensure that the necessary physical transport infrastructure is in place for the lifetime of the Plan.

### Chapter Content

- 16.4 This chapter sets out the Local Plan policies and approach to ensure sufficient transport infrastructure to meet the needs of the existing and future population. General, social and green infrastructure are covered in separate chapters earlier in this Local Plan.

### The Key Issues

- 16.5 Crawley's population is still growing, two new neighbourhoods are being added to the town and additional housing sites are proposed in this Local Plan. Growth in employment numbers and at Gatwick Airport is also anticipated. Therefore, it is important to ensure that the key transport are improved and if necessary expanded to meet the needs of the town.

#### Sustainable Transport Chapter Consultation Questions:

- What aspects of the transport system in and around Crawley work well?
- What aspects of the transport system in and around Crawley work less well? How could these be improved?
- In what ways does the design and layout of Crawley create opportunities for improvements in provision for different transport modes (cars, public transport, walking and cycling)?
- In what key ways would you like transport in Crawley to be different in 2035?
- Do you think a Western Relief Road from the A264 at Kilnwood Vale to the A23 at County Oak would be a benefit to the town?

### Local Plan Policies

#### Sustainable Transport

- 16.6 Developments normally generate additional traffic and create new access requirements. The location of development and the intensity of the usage are the two crucial variables that will ultimately determine whether developments are sustainable in terms of the local or regional transport network. Therefore, developments, if positioned in sustainable locations, can provide tangible opportunities to improve the wider transport network.
- 16.7 Furthermore, the NPPF states that plans should endeavour to minimise the need to travel and maximise the use of sustainable transport modes. In Crawley, the public

transport system is accessible and extensive, and moreover, the distances needed to travel are relatively short, owing to the compact nature of the town. This provides an opportunity for cycling and walking to be an attractive form of transport.

### Strategic Policy ST1: Development and Requirements for Sustainable Transport

Development should be located and designed so as to encourage travel via the walking and cycling network and public transport routes, while reducing dependency on travel by private motor vehicle (also see Policy CD4a and CD4b). This should include:

- i. Designing developments to prioritise the needs of pedestrians, cyclists and users of public transport over ease of access by the motorist;
- ii. Providing an appropriate amount and type of parking in accordance with Policy ST2;
- iii. For development which generates a significant demand for travel, and/or is likely to have other transport implications: contributing to improved sustainable transport infrastructure, including, where appropriate, routes identified in the council's Local Cycling and Walking Infrastructure Plan;

Developments should meet the access needs they generate and not cause an unacceptable impact in terms of increased traffic congestion or highway safety. Developments 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.

In order to consider such impacts, developments that generate a significant amount of movements (thresholds as outlined in the Local List) should be supported by a:

- a) Transport Statement, which assesses the impact of a development with relatively small transport implications; or a
- b) Transport Assessment, which assesses the impact of a development when there are significant transport implications, and a Travel Plan, which identifies how the development will maximise the usage of sustainable modes of transport as opposed to the private motor vehicle.

The applicant should view the Local List of Planning Requirements (or any subsequent document) to ensure that they submit an appropriate Transport Statement or Transport Assessment with their planning application.

#### **Reasoned Justification**

16.8 *In line with the current NPPF, this Policy reflects the approach that developments which generate a significant amount of movement should be situated in sustainable locations. Sustainable locations are defined as sites which minimise the need to travel, such as the town centre, and also takes advantage of the opportunities to utilise public transport and both the cycling and walking network. As a consequence, it is considered appropriate that large retail, commercial, employment or leisure developments should be concentrated in locations where an existing transport infrastructure can sustain such developments for the long-term. It is envisaged that such a policy will encourage modal change, particularly to public transport, cycling and walking which will subsequently reduce greenhouse gas emissions and the use of private motor vehicles.*

16.9 *Importantly, developers play a key role as part of this overall approach since developments should meet the access needs of the developments. This should either be through the direct improvement of transport infrastructure associated with it, or through wider transport infrastructure enhancements and/or improvements to public*

*transport, cycling and walking facilities. Indeed, it is for the developer to meet such needs either through a Section 106 Agreement (to mitigate specific site matters relating to the development in question) and/or, in the future, through CIL as set out in Policy IN1. This can include improvements to the public transport, cycling and the walking networks. In meeting the transport need that the development generates reference should be made to any existing strategies and priorities that have been identified, e.g. cycle schemes.*

#### **Policy ST1: Development and Requirements for Sustainable Transport Consultation Questions:**

- Is this policy consistent with national planning policy requirements relating to the promotion of sustainable transport?
- Are there requirements or terms within the policy which should be explained more fully, either in the policy or elsewhere?
- Are the requirements of the policy justified and appropriate?
- Are there additional ways in which the policy can reasonably support sustainable transport?

### **Parking**

16.10 Parking standards are essential in terms of ensuring that developments have a satisfactory provision of car parking spaces and cycle parking spaces, but also to ensure that other more sustainable uses of transport are still utilised.

16.11 In addition, the older residential neighbourhoods, where modern parking needs of residents were not foreseen when the neighbourhoods were first developed, have limited on-street car parking spaces available. However, owing to the limitations of the highway network and the ever increasing need to retain environmental assets and open space, it is believed that policies contained within the Local Plan should still concentrate on more sustainable modes of transport in order for the town to accommodate a growing travel demand.

### **Strategic Policy ST2: Car and Cycle Parking Standards**

Development will be permitted where the proposals provide the appropriate amount and type of car and cycle parking to meet its needs when assessed against the borough council's car and cycle parking standards. These standards are contained within the Parking Standards Annex to the Urban Design Supplementary Planning Document (SPD) or any subsequent similar document.

Car parking standards for residential development are based on the accessibility of the area, the levels of car ownership, and the size of any new dwellings.

Parking standards for other types of developments will be based on the particular usage of the premises, which will take account of the intensity and requirements of each employment usage and the accessibility of an area by public transport and other sustainable modes.

A level of car parking provision which falls below the requirement detailed in the standards may be acceptable in central, highly accessible locations, where comprehensive car parking controls are in place and travel plan measures targeted at reducing car ownership are provided.

Provision of new car parking spaces should include a proportion of spaces with electrical charging facilities installed and operational, in accordance with the most recently published West Sussex County Council Guidance on Parking at New Developments. The

remaining spaces should include 'passive' provision, i.e. ducting to allow facilities to be installed at a later stage. These requirements in respect of EV charging points should be understood to form part of Crawley's Parking Standards.

### **Reasoned Justification**

16.12 *In accordance with the NPPF, it is contended that the Local Authority should seek to enhance the quality of parking, particularly in the Town Centre, to ensure that it is convenient, safe and secure. This Policy will seek to improve parking throughout the town via the assessment of parking standards for developments (or existing developments that increase floor space and/or intensify the permitted usage), which ensures that the appropriate level of cycle and car parking will accompany all planning applications that are permitted.*

16.13 *Parking standards for both residential and non-residential development are currently established in the Planning Obligations and s106 Agreements Supplementary Planning Document (SPD) adopted in 2008. It is anticipated these will be subject to review, for inclusion in the new Urban Design SPD. In line with the NPPF, the parking standards take into account the accessibility of the extended or development through the use of zones and reflect the ability of certain areas to accommodate further parking spaces. In addition, the particular type, mix and usage of the site will have a bearing on the number of parking spaces that any planning application will require. With these parking standards, an appropriate number of both cycle and car parking spaces will be provided, alleviating congestion.*

### **Policy ST2: Car and Cycle Parking Standards Consultation Questions:**

- Are the parking standards for the borough clear?
- Should the parking standards these be located in the policy, or supporting text within the Local Plan or is it sufficient that they are available through the supplementary planning documents (including the West Sussex Guidance in respect of Electric Vehicle charging), allowing them to be more easily updated? What are the downsides to this?

### **Rail Stations**

16.14 The main rail stations provide highly sustainable opportunities for major development and are fundamental to ensuring that sustainable modes of transport are utilised. However, it is important that such development opportunities should reflect the function and operation of the particular stations concerned. The key stakeholder operating the rail stations, Network Rail, is also committed to improving all four rail stations over the Plan period, with major improvements already underway at Three Bridges rail station.

### **Policy ST3: Improving Rail Stations**

Any improvements or developments at or within the vicinity of railway stations will be expected to enhance the specific roles of the individual stations, the sustainable access to individual stations, and:

- a) at Gatwick Station, support its function as an airport-related interchange and provide opportunities for broadening the function of the station as an interchange for surface travellers using rail, coach, Fastway and other buses;
- b) at Three Bridges Station, support its role as a potential parkway station and as a major interchange between the rail, bus and highway network;
- c) at Crawley Station, support its role as a major gateway to the Town Centre and improve its integration with the main shopping area and bus station;

d) at Ifield Station, strengthen its role as a local suburban station meeting the needs of residents in the west of the town;

For further policy guidance relating to land close to the borough's rail stations, please see Policy CD4a.

### **Reasoned Justification**

16.15 *This policy endeavours to ensure that the specific function of each rail station within the borough is enhanced:*

- *Gatwick rail station is in a highly strategic location for transport, not only within the borough, but for the wider South East region. It is important to seize opportunities for any possible improvements for broadening the function of the station to include further surface travellers, particularly those who use sustainable modes of transport, such as rail or buses.*
- *Three Bridges rail station is a major rail junction for both the Brighton main line and the Bognor Regis/Southampton rail line. As a major transport interchange for commuters, it is envisaged that the station can better serve those using buses, cycles and the highway network.*
- *Crawley rail station acts as a major gateway into the Town Centre, and thus, it is important to support the station's integration into the main shopping area through environmental improvements and high-quality urban design.*
- *At Ifield rail station, the development of the Kilnwood Vale neighbourhood (in Horsham district) to the west of the town means it is important to strengthen the role of this suburban rail station in order to meet the needs of any increases in rail patronage.*

16.16 *The NPPF states that it is important to support strategies that are necessary for the sustainable growth of airports, and subsequently, it is considered that improvements to Gatwick rail station's concourse and access will help ensure the sustainable growth of the airport in the future. In addition, the NPPF states that Local Plans should allow authorities to identify priority areas for infrastructure provision and/or environmental enhancements to build sustainable economic growth. It is integral for both Crawley and Three Bridges rail stations to have improvements or developments within the locality, in order to ensure that opportunities are exploited for the use of sustainable transport, which coincides with Policy IN3.*

### **Policy ST3: Improving Rail Stations Consultation Questions:**

- Is this policy justified and necessary?
- Are there elements of the policy requirements which could be further clarified, either in the policy or elsewhere?
- Does the policy accurately describe the roles which each station can and should play within the borough and the wider transport network?

### **Alignment for New Relief Road**

16.17 The Transport Modelling undertaken for the Crawley Borough Local Plan 2030 identified a number of junctions within the borough which were already at capacity or required mitigation following new development. This was based on less than the quantum of development already coming forward in Crawley, and that being delivered through the Mid Sussex District Plan, Horsham District Planning Framework and Reigate and Banstead Core Strategy. Further major development is being promoted to the west of Crawley, and Gatwick Airport's draft Master Plan anticipates significant growth in passenger numbers at the airport, even just on a

single runway. The cumulative impact of these developments will exacerbate existing capacity issues on roads within Crawley. Therefore, it is considered necessary to undertake further strategic transport assessment considering the cumulative impacts of development across the area. Due to the potential levels of development it is considered that the council's identify and safeguard the potential corridor of land within Crawley for a potential full Western Relief Road. This will need to link to a route corridor within Horsham District to the west.

#### **Strategic Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Relief Road**

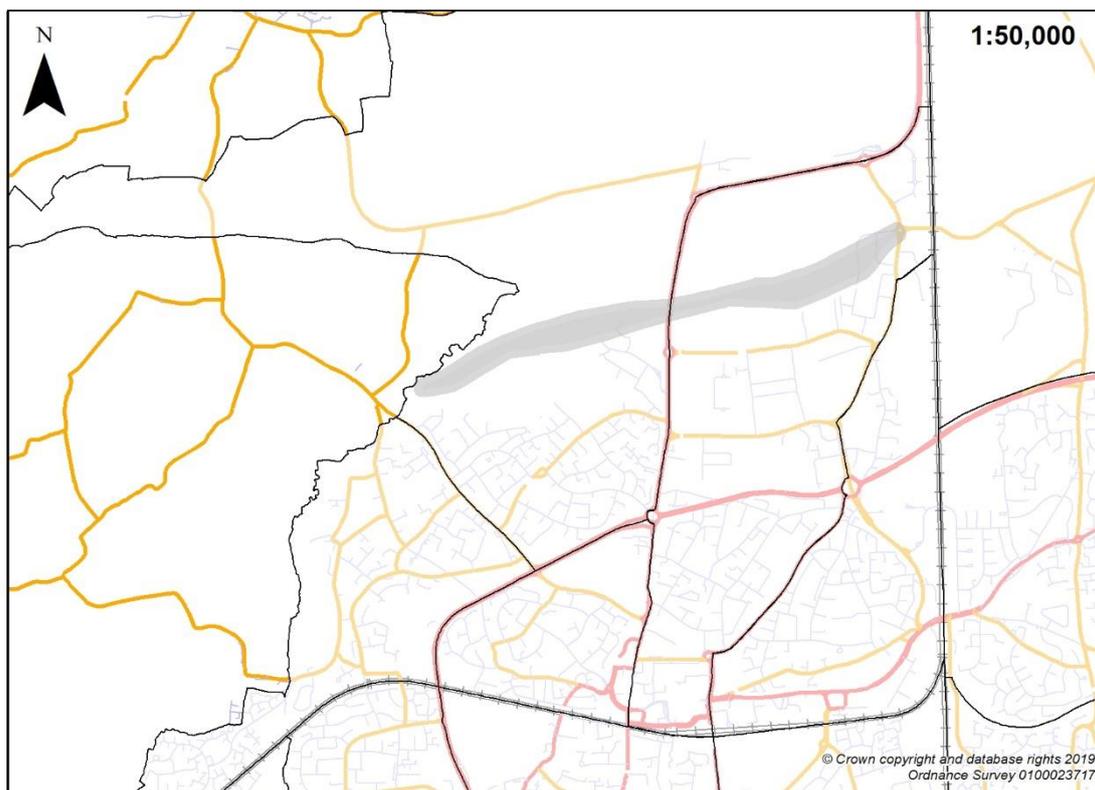
The consultation draft Local Plan Map identifies a Search Corridor for a Crawley Western Relief Road linking the A264 with the A23. This Search Corridor which will be safeguarded from development which would be incompatible with the future delivery of a full Crawley Western Relief Road.

The design and route of the Western Relief Road must take account of its impact on residential properties close to the route, the flood plain, the rural landscape, local biodiversity, heritage and heritage landscape assets and visual intrusion. Connectivity by non-vehicular modes of transport between Crawley's urban neighbourhoods and the wider Sussex countryside should be maintained and enhanced.

#### **Reasoned Justification**

- 16.18 *The Western Relief Road should provide a new strategic road link for traffic from the west, and from Kilnwood Vale and any new development west of Crawley to link directly with the A23 at County Oak serving Manor Royal and Gatwick. This will remove the need for this traffic to come further east into Crawley, travel around all the Bewbush/Broadfield roundabouts to link with the A23, a route which is known to be increasingly congested at peak times.*
- 16.19 *The provision of a full Western Relief Road between the A264, west of Kilnwood Vale, and the A23 (North of County Oak) is necessary to reduce existing congestion on the A2220 and A23, remove through traffic from the neighbourhood junctions and residential roads, reduce traffic rat-running on rural routes to Gatwick Airport, and reduce pressure on the M23 Junctions 10 and 11. It will also help mitigate the surface access impacts of growth at the Airport, provide alternatives to help address the impacts from permitted new developments (Kilnwood Vale, Pease Pottage and North Horsham) and from potential future developments on the western side of Crawley. It is anticipated that detailed impacts of further development onto the Crawley road network would be modelled through the Horsham District Local Plan Review process, and will also be included in the Crawley Transport Model Update as part of the Crawley Local Plan Review.*
- 16.20 *Without commitment to the construction of a full Western Relief Road between the A264 and A23 (North), all the traffic from any development to the west of Crawley, from permitted schemes and any future proposals which could emerge through the Horsham District Plan Review and/or through planning applications permissions granted as windfalls, is likely to feed into residential roads in Ifield and/or Langley Green and onto the already congested A23 junctions, particularly the Ifield Avenue/A23 junction in the long term. 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, the biodiversity in the SNCI, the character of Ifield Village Conservation Area, the flood plain and the recreational use of the Local Greenspace.*

- 16.21 A Western Relief Road would enable the prioritisation of connectivity by more direct routes for public transport, cycling and walking into Crawley from any new development to the west, with vehicular traffic having to take a longer routes along the Relief Road. Existing public rights of way should be designed into the road, with safe, accessible and convenient road crossing opportunities provided. New opportunities for walking, cycling and horse riding links should be explored.
- 16.22 Land was previously safeguarded for a Crawley Western Relief Road as part of the West of Bewbush Joint Area Action Plan (Policy WB23) because, whilst the Transport Assessment for Kilnwood Vale did not demonstrate it was necessary to serve that development alone, it was considered that it might be needed to serve future development west of Crawley, or wider sub regional objectives.
- 16.23 The proposed Search Corridor is located at the southern edge of land currently safeguarded for a potential future runway at Gatwick Airport. Should safeguarding be removed, then the identification of the alignment for a Western Relief Road through Crawley would form part of the work on an Area-wide Action Plan to identify appropriate land uses across the whole area south of the airport. Ongoing discussions with Gatwick Airport about the alignment of a route will continue, with the aim of minimising the impact on residents living close to the route and the need for land to be compulsorily purchased.



■ Indicative Search Corridor for a Crawley Western Relief Road (Policy ST4)

**Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Relief Road**  
**Consultation Questions:**

- Do you agree that a Search Corridor for a Crawley Western Relief Road should be identified in the Local Plan, or not? Why do you think this?
- Do you consider the Search Corridor covers the appropriate area, or where would you suggest it be located?

## Appendix A: Sustainability Objectives

1. To minimise climate change, by taking actions to reduce the concentration of greenhouse gasses in the atmosphere.
2. To adapt to the effects of climate change, by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change.
3. To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings.
4. To ensure that everyone has the opportunity to live in a decent and affordable home.
5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.
6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.
7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.
8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.
9. To promote healthy, active, cohesive and socially sustainable communities. To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.

## Appendix B: Supporting Guidance Documents

### Crawley Borough Council Documents

**Crawley 2030: Crawley Borough Local Plan 2015 – 2030**, December 2015

**Crawley Local Plan Map**, December 2015

**Crawley CIL Charging Schedule**, 2016

**Crawley Regulation 123 List**, 2016

**Development at Gatwick Airport Supplementary Planning Document**, November 2008

**Manor Royal Design Guide Supplementary Planning Document**, 2013

**Manor Royal Public Realm Strategy**, 2013

**Planning and Climate Change Supplementary Planning Document**, 2016

**Green Infrastructure Supplementary Planning Document**, 2016

**Town Centre Supplementary Planning Document**, 2016

**Urban Design Supplementary Planning Document**, 2016

**Affordable Housing Supplementary Planning Document**, 2017

**CIL Supporting Document: Instalments Policy**, 2016

**CIL Supporting Document: Discretionary Social Housing Relief**, 2016

**CIL Supporting Document: Developer Contributions Guidance Note**, 2016

**Guidance Note: Energy and Water Efficiency for Alterations and Extensions to Buildings**, 2016

**Affordable Housing: Summary Guidance Document for Small Residential Developments**, 2017

**Tinsley Lane Development Brief**, 2017

**Breezehurst Drive Playing Fields Development Brief**, 2018

**Brighton Road Conservation Area Statement**, 2018

**Dyers Almshouses Conservation Area Statement**, 2018

**Forestfields and Shrublands Conservation Area Statement**, 1998

**Hazelwick Road Conservation Area Statement**, 2019

**High Street Conservation Area Statement**, 1998

**Ifield Village Conservation Area Statement**, 2018

**Malthouse Road Conservation Area Statement**, *to be prepared*

**St Peter's Conservation Area Statement**, 2005

**Southgate Neighbourhood Centre Conservation Area Statement**, *to be prepared*

**Sunnymead Flats Conservation Area Statement**, 2004

**Worth Conservation Area Statement**, 2018  
**Air Quality Management Plan**, *to be prepared*  
**HMO Space Standards**, 2013  
**Employment Land Trajectory 2015-2030**, February 2015 and subsequent updates.  
**Housing Trajectory**, 1 April 2019  
**Strategic Flood Risk Assessment**, (adapted from Jacobs) 2014  
**Local Plan Noise Annex**, 2015  
**Local Plan Monitoring and Implementation Framework**, 2015

#### **Other Professional Guidance Documents**

**National Planning Policy Framework** MHCLG, 2019  
**Planning Practice Guidance** DCLG, 2014 and subsequent updates  
**Gatwick Diamond Local Strategic Statement**, 2017  
**West Sussex Waste Plan**, WSCC, 2014  
**West Sussex Minerals Plan**, WSCC, 2018  
**Housing Standards Review Technical Consultation** DCLG, September 2014  
**Planning Policy for Traveller Sites** DCLG, 2015  
**By Design – Urban Design and the Planning System** DETR  
**Secured By Design**  
**Building for Life Criteria** CABE at the Design Council, Design for Homes and Home Builders Federation, 2012  
**Understanding Historic Buildings: A guide to good recording practice** English Heritage, 2006  
**BREEAM New Construction: Non-Domestic Buildings Technical Manual** BRE Global Ltd, 2014  
**LEED 2009 for New Construction and Major Renovations Rating Systems** U.S. Green Building Council, 2009  
**Environment Agency Flood Maps** Environment Agency, updated quarterly  
**Planning Noise Advice Document: Sussex** East and West Sussex Authorities, 2013  
**Air Quality and Emissions Mitigation Guidance for Sussex** Sussex Air, 2013  
**West Sussex Energy Study** AECOM Limited, 2013

## Background Studies & Evidence Base Documents

### Development Strategy

European Directive 2001/42/EC  
Localism Act 2011  
Planning and Compulsory Purchase Act 2004  
Town and Country Planning Act 1990  
The Town and Country Planning (Local Planning) (England) Regulations 2012  
Environmental Assessment of Plans and Programmes Regulations 2004  
National Planning Policy Framework (2019) Ministry for Housing, Communities and Local Government  
Gatwick Diamond Local Strategic Statement (2017) Surrey County Council, West Sussex County Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead District Council.  
Gatwick Diamond Local Strategic Statement Memorandum of Understanding (2016) Surrey County Council, West Sussex County Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead District Council, Tandridge District Council.  
Duty to Cooperate Statement (2014) Crawley Borough Council  
Infrastructure Plan (2014) Crawley Borough Council  
Crawley Local Plan Sustainability Appraisal (2015) Crawley Borough Council  
Crawley Local Plan Sustainability Appraisal Scoping Report (2019) Crawley Borough Council  
Crawley Submission Local Plan Habitat Regulations Screening Report (2013) Crawley Borough Council  
Local Plan Regulation 18 Consultation Statement (2019) Crawley Borough Council  
Crawley Borough Council's Local Plan Local Development Scheme 2019 – 2021 (2019) Crawley Borough Council  
Crawley's Statement of Community Involvement (2017) Crawley Borough Council  
Crawley Borough Council Whole Plan & Community Infrastructure Levy Viability Assessment (April 2015) Nationwide CIL Service  
Community Infrastructure Levy, SHLAA and Affordable Housing Viability Assessment (2013) Nationwide CIL Service

### Character

Building for Life – Evaluating Housing Proposal Step by Step  
Crawley Baseline Character Assessment (2009)  
Crawley ASEQs and Locally Listed Buildings Heritage Assessment (2010) Alan Baxter  
Historic Parks and Gardens Review (2013) Sussex Gardens Trust  
Crawley Extensive Urban Survey (2008) English Heritage, West and East Sussex  
By Design – Urban Design and the Planning System, DETR  
Secure by Design  
PPS5 Good Practice Guide  
Trees in the Townscape: A Guide for Decision Makers (2012) Trees and Design Action Group

Crawley Built-Up Area Boundary Review (2015) Crawley Borough Council  
Crawley Landscape Character Assessment (2012) Crawley Borough Council  
Urban Rural Fringe Study for Crawley (2006)  
A Strategy for West Sussex Landscape (2005) West Sussex County Council  
West Sussex Landscape Character Assessment (Land Management Guidelines for Northern Vales, High Weald Forests and adjacent High Weald) (2003) West Sussex County Council  
West Sussex Rights of Way Improvement Plan 2007 – 2017 (2008)  
High Weald Area of Outstanding Natural Beauty Management Plan 2014 – 2019 (2014)  
AONB Unit

## **Economic Growth**

Crawley Economic Growth Assessment Update (2015) NLP  
Economic Growth Assessment (2014) NLP  
Economic Growth Assessment: Crawley Emerging Findings Paper (2013) NLP  
Employment Land Review Part 1 (2009) GL Hearn  
Employment Land Review Part 2 (2010) GL Hearn  
Employment Land Trajectory 2015-2030 (2015) Crawley Borough Council  
Retail Capacity Update (2013) DTZ  
Crawley Retail Capacity and Impact Study (2010) DTZ  
Crawley Town Centre Strategy (2008) Crawley Borough Council  
Town Centre Wide Supplementary Planning Document (2009) Crawley Borough Council  
Manor Royal Supplementary Planning Document and Public Realm Strategy (2013) Crawley Borough Council  
Manor Royal Masterplan (2010) GVA  
Crawley Manor Royal: Final Report (2008) Regeneris  
Crawley's Economic Plan (2011-2016): In Support of Prosperity Crawley Borough Council  
Crawley's Economic Plan (2011-2016): Measuring Prosperity Crawley Borough Council

## **Housing**

Planning Policy for Traveller Sites (2012) Department for Communities and Local Government  
Planning Policy for Traveller Sites (2015) Department for Communities and Local Government  
Identifying the Local Housing Markets of South East England (2004), DTZ Peida Consulting on behalf of South East Regional Assembly and Homes and Communities Agency  
Northern West Sussex Strategic Housing Market Assessment (2009) GVA Grimley  
North West Sussex – Crawley: Strategic Housing Market Update (2012) GVA  
Northern West Sussex Housing Market Area 'Affordable Housing Needs Model Update' (2014) Chilmark Consulting Ltd.  
Objective Assessment of Crawley's Housing and Employment Needs – Updated Report (March 2015) Chilmark Consulting Ltd.  
Crawley Borough Council Locally Generated Housing Needs Assessment (2011) Nathaniel Lichfield & Partners  
Crawley Strategic Housing Land Availability Study (2013) Crawley Borough Council  
Crawley Housing Trajectory, 1 April 2015 (2015) Crawley Borough Council  
Housing Implementation Strategy (2013) Crawley Borough Council

Household Interim Projections (2011 to 2021) in England (9 April 2013) Department for Communities and Local Government

Interim 2011-based Subnational Population Projections for England (28 September 2012) Office for National Statistics

Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2014) Crawley Borough Council

New Market Town Study (2010)

West Sussex Bio City (2010) Bio City Development Company

At Crawley Study (2009) GL Hearn

The Housing Strategy 2009-2013 (2009) Crawley Borough Council

Crawley Borough Council Urban Capacity Study (2013) Crawley Borough Council

Crawley Borough Council Urban Housing Potential Study (2004) Baker Associates

Crawley Borough Council Whole Plan & Community Infrastructure Levy Viability Assessment (April 2015) Nationwide CIL Service

Crawley Borough Council Community Infrastructure Levy, SHLAA and Affordable Housing Viability Assessment (2013) NCS Nationwide CIL Service

## Environment

Planning & Energy Act 2008

Housing Standards Review Consultation (2013) Department for Communities and Local Government

Housing Standards Review Technical Consultation (2014) Department for Communities and Local Government

The Business Case for Green Building (2013) World Green Building Council

Technical Guidance to the National Planning Policy Framework (2012) Department for Communities and Local Government

Zero Carbon Homes – Impact Assessment (2011) Department for Communities and Local Government

Building Regulations Part L

BREEAM New Construction: Non-Domestic Buildings Technical Manual (2014) BRE Global Ltd

Decentralised Energy Study for Crawley (2011) Hurley Palmer Flatt

Planning and climate change in Crawley (2007) Energy Centre for Sustainable Communities

Policy Review Document (2009) Energy Centre for Sustainable Communities

Crawley Carbon and Waste Reduction Strategy (2012) Crawley Borough Council

Crawley Borough Council Corporate Climate Change Strategy (2008) Crawley Borough Council

EU Water Framework Directive

Environment Agency Flood Maps (2013) Environment Agency

Water Stressed Areas – Final Classification (Environment Agency, July 2013)

Crawley Borough Council Strategic Flood Risk Assessment (SFRA) (2012) Crawley Borough Council

Gatwick Sub-Region Water Cycle Study Crawley update (2013) Entec UK Limited

Gatwick Sub-Region Water Cycle Study (2011) Entec UK Limited

Gatwick Sub Region Joint Water Cycle Study Scoping Study (2010) Crawley Borough Council, Horsham District Council, Mid Sussex District Council, and Reigate and Banstead Borough Council

Delivering Sustainable Drainage Systems (2014) DEFRA

The Environmental Noise Directive (2002/49/EC)  
 Environmental Noise (England) Regulations 2006, as amended  
 DEFRA Noise Action Plan: Agglomerations (2014)  
 Environmental Noise and Health in the UK (2010) Ad hoc Expert Group on Noise and Health, Health Protection Agency, Dept. of Health and DEFRA  
 Report to Secretary of State for Communities and Local Government: Land North East Sector (2009) Inspector Martin Pike  
 Annex 1 PPG24: Planning and Noise  
 Planning Noise Advice Document: Sussex (2013) East and West Sussex Authorities  
 Air Quality and Emissions Mitigation Guidance for Sussex (2013) Sussex Air  
 Crawley Borough Local Air Quality Management Progress Report (2012)  
 Crawley Borough Local Air Quality Management Detailed Assessment of Air Quality (2007)  
 Green Infrastructure Discussion Document (2012) Crawley Borough Council  
 South East Green Infrastructure Framework (2009)  
 Natural England Standing Advice  
 Natural Environment and Rural Communities Act 2006  
 Biodiversity 2020  
 Review of CBC's Sites of Nature Conservation Importance Management Plans (2010) Crawley Borough Council  
 Biodiversity Action Plans – Woodland, Urban (Sussex Wildlife Trust)  
 Crawley PPG17 Open Space, Sport and Recreation Assessment (2008) PMP  
 Crawley Borough Play Strategy and Development Plan 2007-2010 Crawley Borough Council  
 Crawley Borough Playing Pitch Strategy for Outdoor Sports (2005) Crawley Borough Council  
 Crawley Open Space Study (2013) JPC Strategic Planning and Leisure Limited  
 Crawley Playing Pitch Assessment (2013) JPC Strategic Planning and Leisure Limited  
 West Sussex Energy Study (2013)

## Infrastructure

Infrastructure Plan (2013) Crawley Borough Council  
 Transport Modelling Part 1 (2012) Amey Consulting  
 Transport Modelling Part 2 (2014) Amey Consulting  
 West Sussex County Council draft Transport Strategy  
 Gatwick Sub-Region Water Cycle Study Crawley update (2013) Entec UK Limited  
 Gatwick Sub-Region Water Cycle Study (2011) Entec UK Limited  
 Gatwick Sub Region Joint Water Cycle Study Scoping Study (2010) Crawley Borough Council, Horsham District Council, Mid Sussex District Council, and Reigate and Banstead Borough Council  
 Crawley Borough Council Whole Plan & Community Infrastructure Levy Viability Assessment (April 2015) Nationwide CIL Service  
 Community Infrastructure Levy, SHLAA and Affordable Housing Viability Assessment (2013) Nationwide CIL Service

## Gatwick Airport

2003 Aviation White Paper  
 Aviation Policy Framework (DfT, March 2013)  
 2008 Legal Agreement between CBC, WSCC and the airport operator  
 2008 Gatwick Airport SPD

2012 Gatwick Master Plan

2019 draft Gatwick Airport Master Plan

Discussion Paper 05: Aviation Noise (2013) Airports Commission

Access Gatwick: Gatwick's Surface Access Strategy 2012-2030 (2012) Gatwick Airport Limited

## Glossary

### Definitions

Active Frontages	Street frontages where there is an active visual engagement between those in the street and those on the ground floors of buildings. This quality is assisted where the front facade of buildings, including the main entrance, face and open towards the street. The objective of achieving active frontages can be realised through a variety of means. Overall, the desirable outcome is avoiding blank walls and increasing visual interest and activity and improving surveillance.
Affordable Housing	<p>Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.</p> <p>See also: Affordable Rented Housing; Intermediate Housing; and Social Rented Housing.</p> <p>Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.</p>
Affordable Rented Housing	Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).
Air Quality Management Area	An area designated by the council because it is likely not to achieve national air quality objectives by the relevant deadlines.
Airport-Related Parking	Parking that is provided for those who travel to the airport by private vehicle for flights. Airport-related parking includes parking associated with hotel guests leaving cars whilst flying from the airport.
Ancient Woodland	An area that has been wooded continuously since at least 1600AD.
Areas of Special Local Character	Designated areas that are considered to be of distinctive character or quality and therefore worthy of protection through rigorous control of new

development, yet do not quite comply with the criteria for designation as Conservation Areas.

Article 4 Direction	A direction which withdraws automatic planning permission granted by the General Permitted Development Order.
B Use Classes/ Business floorspace/ Business Uses	Business: B1a, B1b, B1c; General Industry: B2; and Storage or Distribution: B8, as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended).
BRE Environmental Assessment Method (BREEAM)	A BREEAM assessment uses recognised measures of performance, which are set against established benchmarks, to evaluate a building's specification, design, construction and use. The measures used represent a broad range of categories and criteria from energy to ecology. They include aspects related to energy and water use, the internal environment (health and well-being), pollution, transport, materials, waste, ecology and management processes.
Building Regulations	National Standards, separate to the planning system designed to uphold standards of public safety, health, and construction.
Built-Up Area Boundary	This is the boundary around the area defined in the Local Plan as being built up, distinguishing it from the countryside.
Carbon Neutral	The term given to achieving net zero carbon emissions by balancing the amount of carbon released with an equivalent amount sequestered or offset.
Climate change adaptation	Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which moderate harm or exploit beneficial opportunity.
Climate change mitigation	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
Commission for Architecture and the Built Environment (CABE)	The organisation was the government's advisor on architecture, urban design and public space in England. Its function was to influence and inspire those making decisions about the built environment. It championed well-designed buildings, spaces and places; ran public campaigns; and provided expert, practical advice. In April 2011 the Design Council and CABE came together as one organisation.
Community Infrastructure Levy	A levy allowing local authorities to raise money from owners or developers of land undertaking new building projects in their area in order to fund improvements to local infrastructure.

Conservation (for heritage policy)	The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.
Conservation Area	Areas of special architectural or historical interest, the character or appearance of which it is important to preserve or enhance.
Core Strategy	The central planning document in the Local Development Framework. This system of planning policy was replaced when the NPPF was published.
Countryside	The area outside of the built up area boundary.
Council	Where the “council” or the “borough council” is used it generally relates to Crawley Borough Council, unless it is specified otherwise.
Crawley	Where "Crawley" is used, it generally relates to the area that is within Crawley Borough Council's administrative boundary.
Crossovers	A vehicular access from the highway over a pavement or verge to the curtilage of a property.
Decentralised/District Energy Networks	Local renewable energy and local low-carbon energy usually but not always on a relatively small scale encompassing a diverse range of technologies.
Development	For the purposes of policy interpretation, all reference to “Development” that is made within the Crawley Local Plan, including reference to “Development Proposals”, “Development Schemes”, “Proposals” or “Schemes”, is as per the statutory definition of development set out in Section 55 of the Town and County Planning Act 1990.
District Heating Priority Areas	Designated areas within Crawley that have particular potential for the establishment of decentralised energy networks.
Edge of centre	For retail policy purposes, edge-of-centre sites are locally defined as those sites falling outside of the Primary Shopping Area, though within the Town Centre Boundary, as identified on the Local Plan Map. For all other Main Town Centre Uses, the NPPF definition of edge of centre applies.
Exceptionally significant development	Development which is of national importance.
Embedded carbon/ greenhouse gasses	The carbon emissions generated in the supply chain for that item/product, in order to both create it and move it to where it will be used or sold. It includes the emissions created in extracting and transporting the raw materials required to make the product, the emissions from the manufacturing process, and sometimes also the emissions generated in

	transporting the final product to the point of sale or use.
Employment Uses	Uses as defined within the Use Classes Order that generate employment such as leisure, retail and all B use class development. This does not include any residential uses.
Exception Test	<p>The Exception Test should be applied if, following application of the Sequential Test (Flood Risk), it is not possible for the development to be located in zones with a lower probability of flooding. For the Exception Test to be passed it must be demonstrated that:</p> <ol style="list-style-type: none"> <li>1. The development provides wider sustainability benefits to the community that outweigh flood risk; and</li> <li>2. That 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.</li> </ol>
Frontages	These have been identified locally to help maintain the balance between retail and non-retail uses in the town centre.
Fuel Poverty	A fuel poor household is one that cannot afford to keep adequately warm at reasonable cost. This is generally defined as households that need to spend 10% or more of their annual income on energy to keep their home adequately warm.
Functional Floodplain	Undeveloped land and open space that falls within Zone 3 of the Environment Agency Flood Map. Any areas of the borough that are identified as Functional Floodplain are at the greatest risk of flooding, and fairly regular inundation should be expected.
Gatwick Airport Boundary	The boundary of operational land within the airport.
Green Infrastructure	A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
Greenhouse Gas	Gases that act to trap heat within the earth's atmosphere, they are produced by burning fossil fuels but do also occur naturally.
Gypsy, Traveller and Travelling Showpeople	<p>Gypsies and Travellers are persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.</p> <p>Travelling Showpeople are members of a group organised for the purposes of holding fairs, circuses or</p>

	shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.
Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment	The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) is a technical study that forms part of the evidence base for the Local Plan. As required by the Housing Act (2004) this document assesses the accommodation needs of Gypsies, Travellers and Travelling Showpeople and outlines how their needs will be met.
Gypsy and Traveller "Pitch"	A 'pitch' refers to a pitch on a Gypsy and Traveller site that provides for residential uses. As a general guide and, in line with national guidance recommendations, the average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, a parking space for two vehicles and a small garden area. The amenity building must include, as a minimum, 'hot and cold water supply; electricity supply; a separate toilet and hand wash basin; a bath/shower room; a kitchen/ dining area'. Taking into account the requirements listed above, and, considering the space standards of the borough in relation to the amenity building, an approximate figure of 160 m <sup>2</sup> for each pitch has been established.
Travelling Showpeople "Plot"	A 'plot' refers to a pitch on a Travelling Showpeople site (often called a yard) and refers to a mixed-use site suitable for both employment and residential activities.
Heart of the Gatwick Diamond	Defined in the LEP's Strategic Economic Plan as including Manor Royal, Crawley and the north of Horsham allocation.
Heritage Assets	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets either above or below ground and assets identified by the local planning authority (including local listing).
Heritage Impact Assessments	A document that is required as part of a planning application when the development affects a heritage asset, these were previously known as Heritage Statements.
Historic Parks and Gardens	Areas that encompass aesthetic, philosophical, botanic and scientific heritage and embody shared values of landscape and place.

Housing Implementation Strategy	A Housing Implementation Strategy provides a summary of the council's approach to managing the delivery of housing over the Plan period and sets out how a 5-year supply of housing will be maintained to meet the planned target.
House in Multiple Occupation	A house in multiple occupation (HMO) is a property that is occupied by a number of individuals who share facilities, or do not have exclusive occupation of the whole property. HMO's generally comprise accommodation where two or more individuals share basic amenities (bath/shower, WC or kitchen).
Housing Market Area	This is a geographical area which is relatively self-contained in terms of reflecting people's choice of location for a new home i.e. a large percentage of people settling in the area will have sought a house only in that area.
Important Views	Specific long or panoramic views of the town as identified through a character assessment of the Borough.
Infrastructure	Includes transport facilities; such as roads, rail stations and bus stations; affordable housing; 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.
Infrastructure Plan	Local Planning Authorities are expected to work with other Local Authorities and infrastructure providers to assess the quality and capacity of infrastructure within the area, and its ability to meet forecast demands. The Infrastructure Plan will confirm the capacity of infrastructure required to meet the demands of growth within the town anticipated through the Local Plan, and moreover, any mitigation that may be required.
Infrastructure providers	Organisations responsible for the provision of certain types of infrastructure.
Intermediate Housing	Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definitions. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.
Listed Buildings	Buildings which appear on a national list due to their special architectural or historic importance. The buildings are protected by law.

Local Biodiversity Action Plans	Each individual Species or Habitat Action Plan has a number of objectives, and details actions to be carried out in order to conserve and enhance populations of particular animal and plant species, or to protect and enhance valuable habitats.
Local Plan	Is the term given to this document. In law this is described as a development plan document adopted under the Planning and Compulsory Purchase Act 2004. It guides development of the local area for the future and was drawn up by the local planning authority in consultation with the community.
Local Planning Authority	The public authority whose duty it is to carry out specific planning functions for a particular area. In this document it tends to refer to Crawley Borough Council.
Locally Listed Buildings	Buildings, or structures worthy of protection in the local context due to their historic interest, architectural interest, group and townscape value, intactness, and/or communal value.
Low Carbon Energy	A term attributed to energy generated in a way that produced very low levels of carbon per unit in relation to conventional energy generation techniques.
Low Cost Housing	Market housing that is made available to first time home buyers intended as their primary place of residence and offered as a fixed equity at an agreed percentage below open market value.
Low/Zero Carbon Development	Zero carbon developments achieve no net emissions by reducing carbon emissions through use of on-site renewable energy generation, and balancing any imports with exports to the National Grid to achieve a zero balance. Low carbon developments are similar to zero carbon developments, the only difference being that they need to achieve at least a 50% reduction in emissions (where this applies specifically to energy use in buildings).
Main Town Centre Uses	As defined by the NPPF: retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities, the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
Major Development	As defined by the Town and Country Planning (Development Management Procedure) (England) Order 2010, 'major development' means development involving one or more of the following:

- (a) the winning and working of materials or the use of land for mineral-working deposits;
- (b) waste development;
- (c) the provision of dwellinghouses where –
  - (i) the number of dwellinghouses to be provided is 10 or more; or
  - (ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);
- (d) the provision of a building or buildings where the floorspace to be created by the development is 1,000 square metres or more; or
- (e) development carried out on a site having an area of 1 hectare or more.

Manor Royal	Manor Royal is the Gatwick Diamond’s leading business district. For the purposes of the Crawley Local Plan, reference to Manor Royal relates to the area defined as Manor Royal (Policy EC3) on the Local Plan Policies Map. As such, reference within the Local Plan to Manor Royal includes the areas known as Manor Royal Business District (as identified by the Manor Royal Business Group), County Oak (and surrounding employment land), and City Place.
Manor Royal Business District	This is the area of Manor Royal that is represented by the Manor Royal Business Group. This forms part of the wider Manor Royal Main Employment Area, alongside County Oak and City Place.
Modal change	The shift towards the utilisation of sustainable transport methods that minimise the negative impacts on the environment, such as public transport, walking or cycling, instead of the motor vehicle.
National Planning Policy Framework	Sets out the government's planning policies for England and how these are expected to be applied to produce distinctive local and neighbourhood plans that reflect the needs and priorities of their communities.
Nationally described standards	A series of standards that will be introduced at the national level for Local Authorities to adopt.
Neighbourhood	Crawley has grown up on a neighbourhood-by neighbourhood basis known as the neighbourhood principle. Each neighbourhood is a large planned development, predominantly consisting of housing with a central shopping parade, supported by other facilities, services, and open space to meet the day-to-day needs of the people who live and work there.
Neighbourhood Centres	The area at the centre of a neighbourhood that forms a small economic and cultural core providing facilities for the residents of that neighbourhood.

Neighbourhood Plans	A plan prepared by a Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004). At present, there are not any neighbourhood plans being progressed in Crawley.
Network Ready	Network ready, in relation to Decentralised Energy Networks, means that the development is optimally designed to connect to a District Energy Network on construction or at some point after construction, and include the incorporation of site-wide communal energy systems to serve all demand.
New Town	Crawley is known as a New Town, a product of the New Towns Act 1946. The New Towns consisted of a new community that was carefully planned from its inception and is typically constructed in previously undeveloped areas, or by merging several smaller built up areas. This contrasts with settlements that evolve over a long time period.
Noise Sensitive Development	Any dwelling, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other facility or area of high amenity, which may be susceptible to noise. Also referred to as: Noise Sensitive Receptor.
Northern West Sussex	Primarily consisting of the three administrative areas of Crawley Borough, Horsham District and Mid Sussex District.  As a Housing Market Area a small area of the southern part of Reigate and Banstead Borough also falls within this description.
Objectively Assessed Housing Need	The amount of new housing required over the Plan period which meets household and population projections and takes account of migration and demographic change (births and deaths).
Older People	“Older people” is usually the term for people ages 65+ years
Older People’s Housing	Specialist housing to meet the needs of older people; including: sheltered, enhanced sheltered, extra care, registered care, as well as bungalows and general housing, including step-free apartments, adapted to meet the needs of maximising the opportunities for assisting older people to retain their independence for as long as possible, including through meeting accessibility standards set out in Part M, category 3 of the Building Regulations.
Open Space Study	An assessment of the needs for open space, sports and recreation facilities and opportunities for new provision.

Open Spaces	Open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
Out of centre	Locations that are situated beyond the Town Centre Boundary, as identified on the Local Plan Proposals Map, are defined as out-of-centre.
Planning Condition	A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.
Planning Obligations	A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.
Playing Field	The whole of the site that encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2010.
Pollution	Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.
Previously developed sites	A site which is or was occupied by a permanent structure, including the curtilage of developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes land that has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.
Primary Shopping Area	A defined area where retail development is concentrated. In Crawley, this comprises the Primary Shopping Frontages, and Secondary Shopping Frontages which are adjoining and closely related to the Primary Shopping Frontage.
Public transport	The term used to refer to trains and buses and other communal forms of transport.

Radiant energy	The term is used particularly when radiation is emitted by a source into the surrounding environment. In this document it refers to the energy from the sun.
Renewable & low carbon energy	Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).
S106 Agreement	An agreement under Section 106 of the Town and County Planning Act which contains legally enforceable obligations to mitigate the impact of development proposals.
Safeguarded Land	Land that is required to be safeguarded by the Airports White Paper 2003 for the building of a second runway should it be required.
Safeguarded Zone	An area defined in Circular 01/03: Safeguarding of aerodromes. This enables the potential impact of development proposals on navigation systems and the safe operation of aircraft to be assessed.
Sequential Test (Flood Risk)	A national planning policy requirement that seeks to steer new development to areas with the lowest probability of flooding. In demonstrating that the requirements of the sequential test have been met, proposals should refer to the NPPF and Planning Practice Guidance, and the Environment Agency Flood Map.
Sequential Test (Main Town Centre Uses)	This applies to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. The test requires applications for main town centre uses to be located in town centres, then in edge-of-centre locations and only if suitable sites are not available should out of centre sites be considered.
Sites of Nature Conservation Importance	Locally important sites of nature conservation adopted by local authorities for planning purposes and identified in the local development plan.
Social Rented Housing	Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.
Standing Structures	In the context of Heritage Assets these can be any type of built historic structure standing above ground

	including all types of building whether domestic, agricultural, industrial, military or transport-related and in whatever condition whether habitable, in use or ruined and only partially surviving. Such structures can also include street furniture (for example a historic lamp-post), monuments, headstones and war memorials.
Strategic Housing Land Availability Assessment	The Strategic Housing Land Availability Assessment (SHLAA) is a technical study that forms part of the Evidence Base for the Local Plan. It identifies potential housing sites and assesses whether these sites are developable, how many housing units could be accommodated on them and when they could be delivered.
Strategic Housing Market Assessment	The Strategic Housing Market Assessment is an evidence base document which assesses the housing needs of the area. The Strategic Housing Market Assessment identifies the scale and mix of housing and range of tenures that residents require.
Supplementary Planning Documents/Supplementary Planning Guidance Notes	Documents which expand upon identified Local Plan policies to provide more detailed guidance on how the policy should be interpreted and applied.
Sustainability Appraisal	Under the regulations of the Planning and Compulsory Purchase Act 2004, Crawley must undertake a Sustainability Appraisal (SA) of the Local Plan to satisfy independent examination to allow the Plan to be formally adopted. The SA is an ongoing process, which endeavours to identify the social, environmental and economic impacts of planning policies or allocations within a Local Plan.
Sustainable Development	Development that meets the social, economic and environmental needs of the present without compromising the needs of the future.
Sustainability Statement	A document submitted as part of a planning application that sets out how the development has or will achieve the objectives set out in Policy ENV6. The Planning & Climate Change Supplementary Planning Document provides detailed guidance on what should be included in the statement and the level of detail it contains will vary depending on the type and scale of the proposed development.
Sustainable Transport	Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.
Sustainable Drainage Systems	Designed to control surface water runoff close to where it falls and mimic natural drainage as closely as possible.

Three Bridges Corridor	An area between Three Bridges Station and Crawley Town Centre that offers a selection of older and smaller employment units.
Town Centre	In retail policy terms, the town centre is represented by the Primary Shopping Area as identified on the Local Plan Map and defined above.
Town Centre Boundary	The town centre boundary is shown on the Local Plan Map, and defines the area within which main town centre uses are focused. It encompasses the Primary Shopping Area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.
Tranquil Areas	Areas sufficiently remote from the visual or audible intrusion of development or traffic to be considered unspoilt by urban influences.
Transport Modelling	A Transport Modelling Assessment is a technical study that forms part of the evidence base for the Local Plan, which assesses the future traffic impact resulting from traffic growth and development on the operation of roads, junctions and transport systems.
Urban Capacity Study	A technical study that forms part of the evidence base for Crawley's Local Plan. The document is used to assess potential employment and housing sites within the town.
Use Class	Land uses as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended).
Viability	Where the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements, when taking account of normal cost of development and mitigation, provide competitive returns to a willing landowner to enable the development to be deliverable.
Water Stress	Water stress occurs when the demand for water exceeds the available amount or when poor quality restricts its use.
Windfall Sites	Windfall sites are potential housing sites which have not been specifically identified as available in the Local Plan process. They normally comprise of sites that have unexpectedly become available for a residential use.

## Abbreviations

AONB	Area of Outstanding Natural Beauty
ASLC	Area of Special Local Character
AQMA	Air Quality Management Area
BREEAM	BRE Environmental Assessment Method
BUAB	Built-Up Area Boundary
CAA	Civil Aviation Authority
CABE	Commission for Architecture and the Built Environment
CHP	Combined Heat and Power
DCLG	Department for Communities and Local Government
DECC	Department of Energy and Climate Change
Defra	Department of Environment, Food and Rural Affairs
DPD	Development Plan Document
EA	Environment Agency
EGA	Economic Growth Assessment
EU	European Union
FRA	Flood Risk Assessment
HER	Historic Environment Record
HMO	Houses in Multiple Occupation
HMA	Housing Market Area
LDS	Local Development Scheme
LEED	Leadership in Energy and Environmental Design
LEP	Local Enterprise Partnership
mppa	Million Passengers Per Annum
NPPF	National Planning Policy Framework
NWS	Northern West Sussex
PPG	Planning Practice Guidance
s. 106	Section 106 Agreements (see “Planning Obligations” definition)
SA/SEA	Sustainability Appraisal/Strategic Environmental Assessment

SCI	Statement of Community Involvement
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
WSCC	West Sussex County Council

## CRAWLEY LOCAL PLAN NOISE ANNEX

### 1.0 **Introduction**

- 1.1 Crawley is home to Britain's largest single-runway airport, a key sub-regional employment destination at Manor Royal Business District, and a major motorway (M23). Noise, therefore, represents an important planning consideration in the town.
- 1.2 The revocation of Planning Policy Guidance 24 (Planning and Noise) has resulted in an absence of detailed technical guidance at the national level to guide the relationship between development and noise. This Annex therefore draws upon evidence to provide policy context and establish locally specific guidance through which the approach of Local Plan Policy EP4: Development and Noise should be applied.

### 2.0 **Planning Policy Context**

#### 2.1 **National Policy Objectives**

- 2.1.1 The National Planning Policy Framework (NPPF) sets out the Government's key planning objectives, recognising the need to reduce pollution as one of its 12 key principles. It requires the planning system to prevent new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of pollution (Paragraph 170). Paragraph 180 provides more detail, outlining that local plan policies and development management decisions should avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development. Where conflict does arise, impacts must be mitigated and reduced to a minimum.
- 2.1.2 The NPPF supersedes previous national level Government planning guidance. This included Planning Policy Guidance 24: Planning and Noise, which outlined measurable numeric noise categories through which the relationship between development and noise could be assessed.
- 2.1.3 With PPG24 having been revoked, the NPPF identifies the Explanatory Note of the Noise Policy Statement for England (DEFRA, 2010) as guidance for interpreting the level at which noise is considered to give rise to significant adverse impact. However, this does not identify measurable noise values to identify the 'Significant Observed Adverse Effect Level', the noise exposure level above which significant adverse effects on health and quality of life occur.
- 2.1.4 The Government has since published *Planning Practice Guidance: Noise* (DCLG, 2013). This outlines that local authorities should take account of the acoustic environment in plan making and decision taking, and in doing so should 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.
- 2.1.5 In line with the Explanatory Note of the Noise Policy Statement for England, this would include identifying whether the overall effect of noise exposure is, or would be, above or below the Significant Observed Adverse Effect Level (SOAEL), and the Lowest Observed Adverse Effect Level for the given situation (LOAEL). The Planning Practice Guidance does not provide technical guidance to establish the levels at which SOAEL or LOAEL occur. It does, however, identify that local planning authorities may produce local plan specific noise standards to apply to various forms of proposed development and locations in their area.

- 2.1.6 Section 130 of the NPPF states '*Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents.*'
- 2.1.7 Section 127a of the NPPF states that '*Planning policies and decisions should ensure that developments... will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.*'
- 2.1.8 ProPG: Planning & Noise – New Residential Development (May 2017) sets out principles of good acoustic design. It recognises the importance of designing out the adverse effects of noise at an early stage, using a holistic design process that creates places that are both comfortable and attractive to live in, where acoustics is considered integral to the living environment.

## 2.2 Local Policy

- 2.2.1 The key objective of Local Plan Policy EP4 is to guide the relationship between noise sensitive development and noise sources to ensure that a good quality of life is maintained for current and future residents.
- 2.2.2 This Local Plan Noise Annex identifies locally specific noise thresholds comprised of measurable value ranges through which noise impact from transport sources can be determined in order to support Policy EP4. These are based on the noise exposure hierarchy set out in *Planning Practice Guidance: Noise* and are discussed in detail in Section 4.1 of this Annex.
- 2.2.3 This Annex also provides guidance where proposals for noise sensitive development may be affected by industrial/commercial noise sources (Section 4.2), and on Noise Generating Development (Section 4.3).
- 2.2.4 Local Plan Policy EP4 also refers to the '*Planning Noise Advice Document: Sussex*' (2015 or latest revision), to assist in the preparation of Noise Impact Assessments. This document has been produced on a joint basis by East and West Sussex local planning authorities to provide clear and consistent guidance as to the level of information that should be submitted with planning applications for noise generating developments or noise sensitive developments, including guidance on when it is appropriate to submit a noise report and the required contents of such a report.

## 3.0 Understanding When Noise Could Become a Concern

- 3.1 *Planning Practice Guidance: Noise* identifies a noise exposure hierarchy which provides broad guidance on the levels at which noise exposure could become a concern.
- 3.2 At the lowest extreme, when noise is not noticeable, there is by definition no effect. As noise exposure increases, it crosses the **No Observed Effect Level**. This is the stage at which noise becomes noticeable, though it has no adverse effect as it does not cause any change in behaviour or attitude. If the noise is at this level, no specific measures are required to manage the acoustic environment.
- 3.3 As noise exposure increases it crosses the **Lowest Observed Adverse Effect Level**, and may reach the **Observed Adverse Effect Level**. At this level noise can start to cause small changes in behaviour and attitude. For example, this could cause people

to turn up the volume on the television or needing to speak more loudly to be heard. The noise level starts to have an adverse effect and steps need to be taken to mitigate and minimise those effects.

- 3.4 Continued increase in noise exposure will at some point cause the **Significant Observed Adverse Effect Level** to be crossed. Above this level, noise causes a material change in behaviour, for example necessitating that windows are kept closed most of time. If noise exposure is above this level, the planning process should be used to prevent this effect from occurring, by use of appropriate mitigation, for example through design and layout.
- 3.5 At the highest extreme, the **Unacceptable Adverse Effect**, noise exposure would cause extensive and sustained changes in behaviour, without an ability to mitigate the effect of noise. At this level, the impacts on health and quality of life are such that regardless of the benefits of the activity causing the noise, the situation should be prevented from occurring.

#### **4.0 Managing Noise in Crawley: Guidance to Support Local Plan Policy EP4**

##### **4.1 Noise sensitive development affected by noise from transport sources**

- 4.1.1 Local Plan Policy EP4 outlines that noise sensitive uses will only be permitted where users of the development will not be exposed to unacceptable noise disturbance from existing or proposed uses.
- 4.1.2 This section provides guidance to determine the threshold at which noise exposure from transport-based sources (air, road, rail, and mixed sources) is considered to become significant or unacceptable in a Crawley context.
- 4.1.3 Building on the noise exposure hierarchy identified in *Planning Practice Guidance: Noise*, and using the previous guidance in PPG24 and evidence identified in Section 6, the Annex identifies measurable local values through which to determine the acceptability of noise sensitive proposals where noise exposure from transport is a factor.
- 4.1.4 In particular, it identifies a measurable threshold for the Significant Observed Adverse Effect Level (SOAEL), i.e. the noise level at which significant adverse effects on health and quality of life occur. It also outlines a measurable threshold to identify the level at which noise exposure is considered to become unacceptable.
- 4.1.5 In determining the acceptability of noise sensitive proposals where noise exposure from a transport source is a factor, the standards set out in Table 1 (below) will be applied.

**NOISE ANNEX TABLE 1:  
Standards for exposure at the façade<sup>76</sup> for all habitable rooms<sup>77</sup> of noise sensitive development affected by noise from transport sources.**

	Examples of Outcomes	Daytime (07:00 – 23:00) Threshold	Night time (23:00 – 07:00) Threshold
No Observed Adverse Effect Level (NOAEL)	<b>Noticeable but not intrusive:</b> Noise can be heard, but does not cause any change in behaviour or attitude. Can slightly affect the acoustic character of the area, but not such that there is a perceived change in the quality of life.	<45dB LAeq,16hr <70dB LAFmax	<40dB LAeq,8hr <55dB LAFmax
Lowest Observed Adverse Effect Level (LOAEL)		45dB LAeq,16hr 70dB LAFmax	40dB LAeq,8hr 55dB LAFmax
Observed Effect Level	<b>Noticeable and intrusive:</b> Noise can be heard and causes small changes in behaviour and/or attitude, e.g. turning up volume of television; speaking more loudly; closing windows some of the time because of the noise. Potential for non-awakening sleep disturbance. Affects the acoustic character of the area such that there is a perceived change in the quality of life.	Between 45db and 55dB LAeq,16hr (45 to 54dB for Air Traffic) > 70dB LAFmax	Between 40dB and 45dB LAeq,8hr (40 to 48dB for Air Traffic) > 55dB LAFmax
Significant Observed Adverse Effect Level (SOAEL)	<b>Noticeable and disruptive:</b> Noise causes a material change in behaviour and/or attitude, e.g. having to keep windows closed most of the time, avoiding certain activities during periods of intrusion. Potential for sleep disturbance resulting in difficulty in getting to sleep, premature awakening, and difficulty getting back to sleep. Quality of life diminished due to change in acoustic character of the area.	For transport sources other than aviation, between 55dB and 66dB LAeq,16hr. (54dB to 60dB for Air Traffic) > 70dB LAFmax	Between 45dB and 57dB LAeq,8hr. (48 to 54dB LAeq,8hr for Air Traffic) 58dB to 82dB LAFmax
Unacceptable Adverse Effect	<b>Noticeable and very disruptive</b> Extensive and regular changes in behaviour 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.	For transport sources other than aviation, greater than 66dB LAeq,16hr  For aviation transport sources, greater than 60dB LAeq,16hr	greater than 57dB LAeq,8hr (greater than 54dB LAeq,8hr for Air Traffic)  > 82dB LAFmax (to be reviewed)

4.1.6 All the above levels would include the predicted noise from any proposed or required changes in transportation noise including the potential 2<sup>nd</sup> wide spaced runway at Gatwick Airport as set out in the 2003 White Paper and any forthcoming replacement

<sup>76</sup> Predicted free-field levels.

<sup>77</sup> Habitable rooms includes living/dining rooms, bedrooms, kitchen diners and studies.

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 Gatwick Airport and approved 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 Gatwick Airport and approved by the CAA.

- 4.1.7 In interpreting the categories for the purposes of Local Plan Policy EP4, noise exposure is considered to be acceptable where the internal noise climate achieves standards set in BS8233 or replacement guidance. (N.B. the noise levels provided in BS8233 refer to steady noise sources only). It is also expected that to achieve an acceptable internal noise climate that individual noise events shall not exceed 45dB LA<sub>max</sub> on a frequent basis. The acceptability of the frequency of events will depend on the level of exceedance of the 45dB LA<sub>max</sub> criteria. Up to 10 events may be acceptable for small exceedances (<5dB), whilst for high exceedances (>10dB) less than 5 events will be acceptable.
- 4.1.8 Noise exposure is considered to be significant at the Significant Observed Effect Level (SOAEL) of between 57dB LA<sub>Aeq,16hr</sub> and 66dB LA<sub>Aeq,16hr</sub> and between 45dB and 57dB LA<sub>Aeq,8hr</sub> at night.
- 4.1.9 Unacceptable Adverse Effect is considered to occur where noise exposure is above 66dB LA<sub>Aeq,16hr</sub> (57dB LA<sub>Aeq,8hr</sub> at night).
- 4.1.10 For private amenity areas (private and communal gardens), Noise exposure is considered to be significant at the Significant Observed Effect Level (SOAEL) of between 50dB LA<sub>Aeq,16hr</sub> and 55dB LA<sub>Aeq,16hr</sub> for Roads and Rail and 60dB LA<sub>Aeq,16hr</sub> for Aircraft noise. The Unacceptable Adverse Effect is considered to occur at 55dB LA<sub>Aeq,16hr</sub> for Roads and Rail, and 60dB LA<sub>Aeq,16hr</sub> for Aircraft noise. This is so that they can be enjoyed as intended.
- 4.1.11 Where noise exposure is likely to be significant, a Noise Impact Assessment will be required in support of planning applications to demonstrate how noise impact will be made acceptable. For further information on the requirements of a Noise Impact Assessment, please see Section 5 of this Annex, ProPG and *Planning Noise Advice Document: Sussex* (2015 or latest version).
- 4.1.12 Any development identified to be within the SOAEL category of this Noise Annex will require additional forms of ventilation to mitigate the adverse effects of noise if the windows have to remain closed to achieve an acceptable internal noise climate. The ventilation must be provided naturally by use of acoustic louvres or window and façade design. If it can be clearly demonstrated that this cannot be achieved, then as a last resort, in exceptional circumstances, alternative mechanical ventilation may be acceptable.
- 4.1.13 Where mechanical ventilation has been agreed with the Local Planning Authority, then the internal noise level must achieve a Noise Rating Curve of 25 (NR25) or lower.
- 4.2 *Noise sensitive development affected by industrial or commercial noise sources*
- 4.2.1 Local Plan Policy EP4 outlines that noise sensitive uses proposed in areas that are exposed to noise from existing or planned industrial or commercial sources, will only be permitted where future users will not be exposed to an unacceptable noise impact. For example, the creation of a statutory nuisance. This reflects the approach of NPPF Para 170(e).

- 4.2.2 This is based on the recognition that to introduce new noise sensitive receptors into locations where they may be affected by noise from established businesses can create conflict between those two uses and may prejudice the existing and future industrial or commercial operations.
- 4.2.3 NPPF paragraph 182 expands, recognising that 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.
- 4.2.4 It is also recognised that some industrial or commercial uses may be planned, in the sense that they are subject to an extant planning permission, or have been identified for economic use through the Local Plan. For this reason, the policy approach also has regard to future planned developments.
- 4.2.5 To ensure that proposed noise sensitive uses do not conflict with existing or planned industrial/commercial uses, noise sensitive development will only be considered acceptable where future users would not be exposed to noise impact that would result in, for example, a statutory nuisance.
- 4.2.6 To ensure that proposals are acceptable in noise terms, an assessment should be made using BS4142 *Method for Rating industrial noise, affecting mixed residential and industrial areas*, or any replacement guidance.
- 4.2.7 Where there is risk that noise sensitive proposals would be affected by noise that may, for example, create a statutory nuisance, a Noise Impact Assessment will be required in support of planning applications to demonstrate how that noise impact will be made acceptable. For further information on the requirements of a Noise Impact Assessment, please see Section 5 of this Annex, and *Planning Noise Advice Document: Sussex* (2015 or latest revision).
- 4.2.8 If it cannot be demonstrated that appropriate mitigation will be provided to manage significant or unacceptable noise impacts to an acceptable level, the proposal will be refused.
- 4.3 *Noise generating development*
- 4.3.1 Local Plan Policy EP4 outlines that noise generating development will be permitted where it can be demonstrated that any nearby noise sensitive uses (as existing or planned), will not be exposed to noise impact that will adversely affect the amenity of users of surrounding noise sensitive premises.
- 4.3.2 To ensure that proposals are acceptable in noise terms, development should comply with BS4142 *Method for Rating industrial noise, affecting mixed residential and industrial areas*, or any replacement guidance.
- 4.3.3 Around the Town Centre, Neighbourhood Parades and mixed use commercial/residential areas, the high density of industrial plant and air-handling units (including kitchen extracts, air-condition units and refrigeration plant) has a cumulative effect of increasing the overall background noise level. To prevent this level continually increasing to the detriment of the local residential amenity in those locations there will

be an expectation that all new noise sources would be expected to operate at a Rating Level (BS4142) of 10dB below the background noise level measured as a  $L_{A90}$ .

- 4.3.4 Where there is risk that development would adversely affect the amenity of users in surrounding noise sensitive premises, a Noise Impact Assessment will be required in support of planning applications, to demonstrate how noise impact will be made acceptable. For further information on the requirements of a Noise Impact Assessment, please see Section 5 of this Annex, and *Planning Noise Advice Document: Sussex* (2015 or latest revision).
- 4.3.5 If it cannot be demonstrated that appropriate mitigation will be provided to manage noise impact to an acceptable level, the proposal will be refused.

## **5.0 Noise Impact Assessment**

- 5.1 As identified in Part C of Local Plan Policy EP4, a Noise Impact Assessment will be required to support applications where noise sensitive uses are likely to be exposed to significant or unacceptable noise exposure.
- 5.2 The Noise Impact Assessment will be required to assess the impact of the proposal as a noise generator or receptor, as appropriate.
- 5.3 It will also be required to demonstrate in full how the development will be designed, located, and controlled to mitigate (as appropriate) the impact of noise on health and quality of life, neighbouring properties, and the surrounding area.
- 5.4 In all cases, the best practical means (or 'all reasonable steps') of mitigation will be required to mitigate noise impact to an appropriate level, and in liaison with Crawley Borough Council Environmental Health.
- 5.5 If it cannot be demonstrated that appropriate mitigation will be provided to manage significant or unacceptable noise impacts to an acceptable level, the proposal will be refused.
- 5.6 In preparing a Noise Impact Assessment, applicants should adhere to *Planning Noise Advice Document: Sussex* (2015 or latest revision), which supports Local Plan Policy EP4 and this accompanying Annex.

## **6.0 Further Reference**

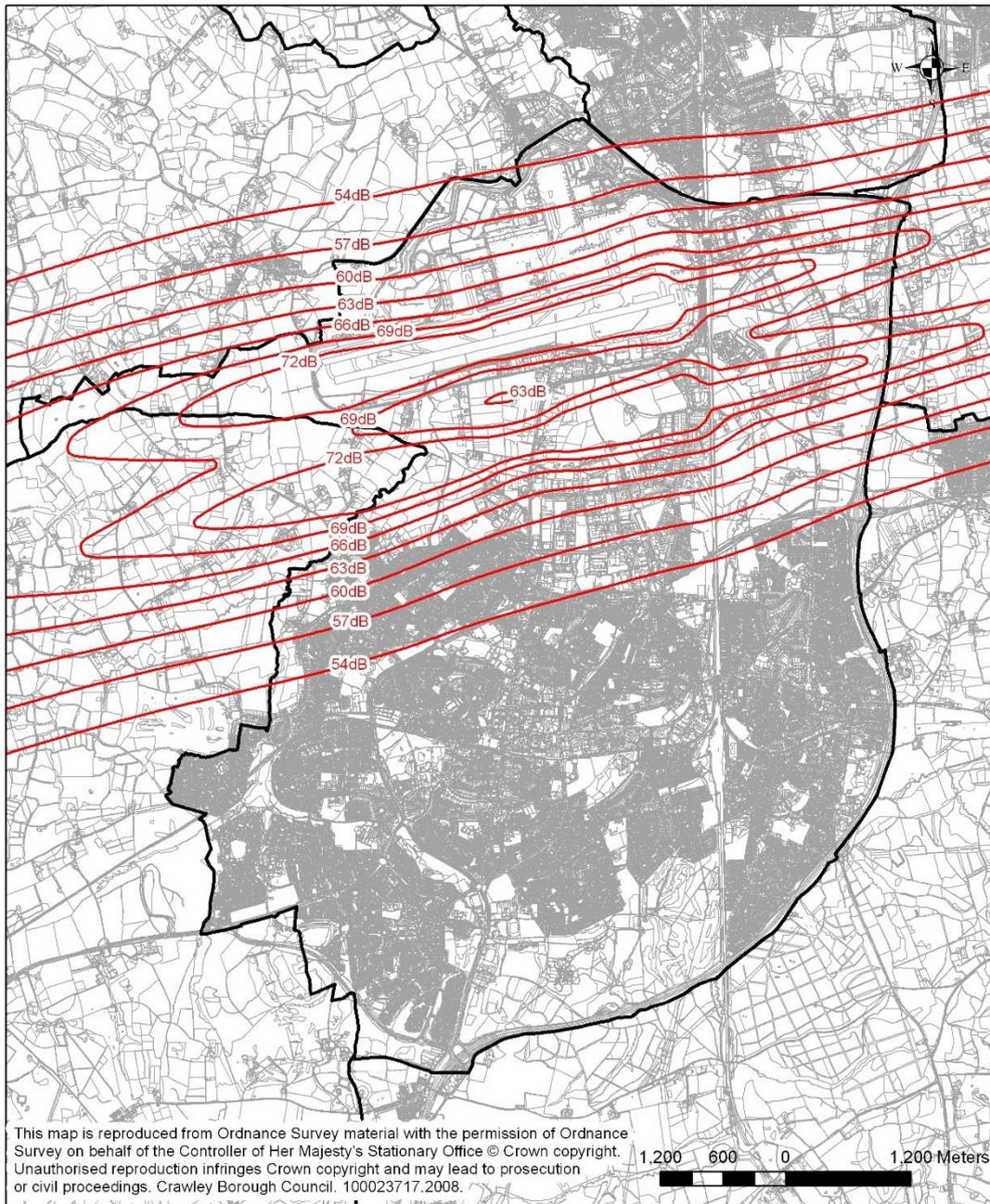
- 6.1 Where development proposals are likely to be affected by noise, either as a source or receptor, applicants are strongly encouraged to liaise with Crawley Borough Council Environmental Health prior to submitting an application.
- 6.2 To contact Environmental Health please email [environmentalservices@crawley.gov.uk](mailto:environmentalservices@crawley.gov.uk) or call (01293) 438247.

**NOISE ANNEX FIGURE 1: TO BE UPDATED: THE PROPOSED WIDE SPACED RUNWAY NOISE CONTOURS TO BE TAKEN FROM GATWCK AIRPORT'S 2019 MASTER PLAN**

**Gatwick Noise Contour 2 Runway Scenario (Policy GAT1 and EP4)**

Gatwick Noise Contour 2 Runway Scenario  
(Policy GAT1 & ENV11)

Based upon ERCD report 0308  
published by CAA (2003)



TECHNICAL APPENDIX: SUPPORTING EVIDENCE IN RELATION TO NOISE FROM  
TRANSPORT SOURCES: *To be updated*

1.0 Introduction

- 1.1 There is a growing amount of research relating to the health impacts of noise, and on the dose response (reaction to increasing noise exposure) relationship between noise and health.
- 1.2 Recent studies have identified a number of causal links between noise exposure and health impacts. These themes are drawn together in key two documents; The Health Protection Agency (HPA) summary document *Environment Noise and Health in the UK* (2010); and through the work of the Government-appointed Airports Commission in *Discussion Paper 5: Aviation Noise* (2013).
- 1.3 Through these documents, it is possible to identify three specific areas in which adverse effects of noise exposure can impact on populations and individuals; Amenity/Quality of Life, Health, and Learning.

2.0 Effects on Amenity and Quality of Life

- 2.1 This form of noise impact may typically affect people in two ways; annoyance, and sleep disturbance.
- 2.2 Annoyance is considered to manifest itself when noise impact disturbs a person's daily life, for example, through interrupting a conversation or causing distraction whilst resting (Airports Commission, 2013). As such, annoyance will typically increase as noise exposure increases, though changes in pitch and intermittency can also increase annoyance.
- 2.3 The *Aviation White Paper* (2003) found the onset of community annoyance to occur at 57dB LAeq16hr, a figure that originates from the 1982 Aircraft Noise Index Study (ANIS).
- 2.4 Over time individual aircraft have become quieter but have increased in number and *Attitudes to Noise from Aviation Sources in England* study (ANASE), DfT, 2007) demonstrated that the number of aircraft had a greater impact on annoyance than increasing average noise levels<sup>78</sup>. This suggests that the level for the onset of community annoyance may actually occur below 57dBA, and that the impact of higher levels of noise may be greater than previously thought. This follows research published by the European Commission with the Environmental Noise Directive (END) in 2002 which showed that equivalent levels of Aircraft Noise created greater annoyance than other modes of transport.
- 2.5 Sleep disturbance is one of the most common impacts described by people living with high levels of noise exposure. It can have a significant impact on quality of life, and people can typically feel a strong resentment where it is felt that their sleep has been disturbed.
- 2.6 The Airports Commission (2013) cited a well-established evidence base which has found noise-induced awakenings to have an adverse effect. It is however less clear as to what extent and level of noise exposure can result in a harmful loss of sleep, and whether lesser reactions to noise that do not involve awakening, can affect well-being.

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<sup>78</sup> Some aspects of the ANASE methodology have been questioned at peer review.

It does appear that even though some adaptation to night noise does occur, complete habituation does not occur, particularly for heart rate (See Physiological Health). It also appears that children are less likely to wake but their physiological reaction is greater.

### 3.0 Effects on Physical and Psychological Health

3.1 There are two significant ways in which this form of noise impact may affect people; hypertension, and mental health.

3.2 The links between noise and hypertension are fairly well established, with research finding that exposure to noise events can place the body under stress, even if there is no conscious reaction to the noise. When stressed, the body releases hormones that may to varying degrees increase heart rate and blood pressure, with the link between high blood pressure and cardiovascular diseases, strokes, chronic renal failure, and heart attack, already well-established. Acute noise exposure has also been linked to other forms of physiological activation including peripheral vasoconstriction with relative withdrawal of blood from the skin, and increased peripheral vascular resistance.

3.3 The European wide Hypertension and Exposure to Noise Near Airports study (HYENA, 2008) examined links between noise from aircraft and road traffic and Hypertension, finding there to be direct links between increased noise exposure and increased hypertension.

3.4 Other research has shown that increased noise may have an exacerbating effect on existing coronary heart disease conditions<sup>79</sup>. Dose-response relationship data has also found that risk of myocardial infarction increases above 60dBA and is significant at 70dBA, with an increased risk of coronary heart disease associated with sound levels above 65-70dBA.

3.5 Links between noise exposure annoyance and mental health have also been hypothesised, with studies identifying anxiety and depression as the most likely psychological symptoms<sup>80</sup>. However, it is acknowledged that further research is needed in this area.

### 4.0 Productivity and Learning Effects

4.1 Noise has been linked to impacts in two particular ways; cognitive impairment in children, and loss of productivity.

4.2 The most consistent observed effects of noise on children (particularly for children at primary school age) are recognised as being cognitive impairments.

4.3 Research has established a number of negative impacts in this regard, and tasks which involve central processing and language comprehension, such as reading, attention, problem solving and memory appear to be most affected by noise exposure. Links between chronic noise exposure and children's cognition have also been suggested, including teacher and pupil frustration, learned helplessness, impaired attention,

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<sup>79</sup> Noise: Babish, 2006; Smoking: Prescott et al. (1998); and lack of exercise: Hu et al. (2005) and Li et al. (2006).

<sup>80</sup> Stansfeld, et al. (1993). Road traffic noise, noise sensitivity and psychological disorder; Hiramatsu, K., et al. (1997). A survey on health effects due to aircraft noise on residents living around Kadena airport in the Ryukyus'; Hardoy, M.C., et al. (2005). Exposure to aircraft noise and risk of psychiatric disorders.

increased arousal, indiscriminate filtering out of noise during cognitive activities resulting in loss of attention, noise annoyance, and sleep disturbance<sup>81</sup>.

- 4.4 It has been shown that there is an association between high noise exposure and poor long-term memory and reading comprehension amongst children living around airports. Research has also suggested that the source of noise may be a factor, with the European RANCH study finding road traffic to have no observed effect of children's reading or memory, whilst observing impaired reading comprehension and recognition memory in children exposed to aircraft noise.
- 4.5 The Airports Commission (2013) notes that the productivity impacts of noise are more secondary in nature, and are linked to effects previously discussed, including sleep disturbance, health impact, links between academic performance and noise, and impacts in terms of workplace distraction.

## 5.0 Other Technical Guidance

### *Aircraft Noise*

- 5.1 The Airports Commission (2013) observes that the metrics used to measure the long-term impact of aircraft noise has recently become a subject of some discussion. UK policy has historically identified  $57_{Aeq16h}$  as the threshold at which daytime noise marks the onset of significant community annoyance. However, it has been argued that the  $57_{Aeq16h}$  contour does not necessarily reflect the day-to-day experience of people living within the contour, who will tend to experience short bursts of intense sound, rather than a constant sound.
- 5.2 Further, it has been noted that significant annoyance may be experienced outside of the  $57_{Aeq16h}$  contour, as acknowledged in the Department of Transport's 2012 Draft Aviation Policy Framework (APF), although in responding to comments on the draft APF the Government has decided against using a lower value to mark the onset of significant community annoyance (Airports Commission, 2013).
- 5.3 With all forms of transportation in the UK, there are sound insulation schemes in place to help homes affected by noise. For aircraft noise, sound insulation schemes are triggered at  $63dB L_{Aeq,16hr}$ . Gatwick Airport also operate the Gatwick Home Relocation Scheme, which is designed to allow those affected by noise levels above  $69dB L_{Aeq,16hr}$  to move home without losing money, as Gatwick Airport will cover all the costs, including the devaluation of the property price due to the increased noise.

### *Noise from Other Transport*

- 5.4 Sound insulation grant schemes are in place in relation to other forms of transport. For Road Traffic Noise<sup>82</sup>, the grant is given when the façade level of road noise exceeds  $68dB L_{A10,18hr}$  which is the equivalent to a free-field level of  $63dB L_{Aeq,16hr}$ . For Railway noise it is  $66dB L_{Aeq,16hr}$ .

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<sup>81</sup> Airports Commission (2013)

<sup>82</sup> Noise Insulation Regulations, 1975: SI 1975:1763





Local Plan Year	Past Year completions	Anticipated Delivery of Dwellings 2017-2030 (Local Plan)																			
	4	5	6	7	8	9	10	11	12	13	14	15									
		Five Year Supply																			
Planning Application Reference	Site Address	Neighbourhood	Issue Date	Lapses Date	Approved or Allocated (gross)	Proposed Losses	Approved or Allocated (net)	Total Completed (net)	Total Outstanding Commit (gross)	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
CR/2016/0240/PA3	FIRST FLOOR, IFIELD HOUSE, IFIELD GREEN	Ifield	09/11/2017	Commenced	3	0	3	3	0												
CR/2016/0775/PA3	OCEAN HOUSE, HAZELWICK AVENUE	Three Bridges	12/12/2016	Commenced	29	0	29	29	0												
CR/2018/0015/PA3	EDF BUILDING, RUSSELL WAY	Three Bridges	01/03/2018	01/03/2021	42	0	42	0	42		42										
CR/2017/0522/PA3	STONER HOUSE, KILNMEAD	Northgate	27/07/2017	27/07/2020	129	0	129	0	129		129										
CR/2017/0882/PA3	SUTHERLAND HOUSE (EASTERN SECTION), RUSSELL WA	Three Bridges	11/12/2017	11/12/2020	136	0	136	0	136		136										
CR/2016/0816/PA3	SHAW HOUSE, PEGLER WAY	West Green	11/11/2016	11/11/2019	26	0	26	0	26		26										
CR/2017/0549/PA3	FIRST & SECOND FLOORS 34-38 THE BROADWAY, SECO	Northgate	31/08/2017	31/08/2020	9	0	9	0	9		9										
CR/2015/0082/PA3	21-28 BROAD WALK	Northgate	17/04/2015	Commenced	3	0	3	3	0												
<b>Total for Prior Approvals</b>					<b>377</b>	<b>0</b>	<b>377</b>	<b>35</b>	<b>342</b>	<b>0</b>	<b>342</b>	<b>0</b>									
<b>Total for Windfalls</b>					<b>742</b>	<b>0</b>	<b>742</b>	<b>0</b>	<b>742</b>		<b>55</b>	<b>55</b>	<b>55</b>	<b>55</b>	<b>55</b>	<b>55</b>	<b>55</b>	<b>55</b>	<b>55</b>	<b>55</b>	<b>55</b>
Prior Approvals Completed or on-site																					
Housing Windfalls																					

<b>Gross Housing Delivery for All Categories</b>	<b>5497</b>	<b>45</b>	<b>5452</b>	<b>540</b>	<b>4901</b>	<b>342</b>	<b>940</b>	<b>903</b>	<b>396</b>	<b>689</b>	<b>254</b>	<b>311</b>	<b>386</b>	<b>278</b>	<b>305</b>	<b>204</b>	<b>55</b>	
						<b>Total Losses for All Categories per annum</b>	<b>0</b>	<b>0</b>	<b>14</b>	<b>0</b>	<b>6</b>	<b>9</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	
						<b>Net Housing Delivery for All Categories per annum</b>	<b>342</b>	<b>940</b>	<b>903</b>	<b>382</b>	<b>689</b>	<b>248</b>	<b>302</b>	<b>386</b>	<b>274</b>	<b>305</b>	<b>204</b>	<b>55</b>

<b>ANTICIPATED GROSS DELIVERY OF DWELLINGS APRIL 2019-MARCH 2030</b>	<b>4721</b>
<b>ANTICIPATED LOSSES</b>	<b>33</b>
<b>ANTICIPATED NET DELIVERY OF DWELLINGS APRIL 2019-MARCH 2030</b>	<b>4688</b>
<b>LOCAL PLAN POLICY H1 MINIMUM HOUSING TARGET 2015-30</b>	<b>5100</b>
<b>NET COMPLETIONS APRIL 2015-MARCH 2019</b>	<b>1848</b>
<b>RESIDUAL MINIMUM HOUSING TARGET FOR APRIL 2019-MARCH 2030</b>	<b>3252</b>
<b>RESIDUAL ANNUAL MINIMUM TARGET FOR APRIL 2019-MARCH 2030</b>	<b>296</b>
<b>TARGET FOR NEXT 5 YEARS - INCLUDING 5% BUFFER</b>	<b>310</b>
<b>PROJECTED NET COMPLETIONS 2018/19-2023/4</b>	<b>3162</b>
<b>YEARS' SUPPLY PROJECTED FOR 2018/19-2023/24</b>	<b>10.19</b>

Notes :

- To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on site within 5 years and in particular, that development is viable (NPPF, para 47)
- To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged (NPPF, para 47)