

# Consultation Statement

January 2021



Appendix 2:  
Early Engagement Consultation  
Representations and Council Response

## **APPENDIX 2: EARLY ENAGAGEMENT CONSULTATION REPRESENTATIONS AND COUNCIL RESPONSE**

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**SUSTAINABLE DEVELOPMENT**

**What do you think are Crawley's key strengths and weaknesses as a sustainable place?**

**Strengths:**

Town layout lends itself to more sustainable transport methods. I love the trees and green spaces in Crawley. Close to Gatwick; Good Leisure services/parks; Balanced demographic

Crawley is an established town. It is well placed in West Sussex not too far from London. Most suitable for new ventures and ideas.

Strength: Gatwick

Good transport links – strength. We have good parks and K2 – these are strengths.

It's green areas/family areas - Tilgate Park, Buchan Park, the adventure playgrounds, wild flowers which have been planted on communal land, children and family centres outdoor gyms etc. Protected parks are its strengths. Good employment and proximity to Gatwick airport

Industry links and influence upon them,

Vibrant economic environment with Manor Royal/Gatwick

High employment opportunities thanks to Gatwick and Manor Royal + cinema complex and County Mall employment.

Close to the airport good local transport commutable to London good shopping centre.

Facilities; transport links; Gatwick Airport; Travel Distance to London; Travel Time to Brighton; Tilgate Park; Business Opportunities in Manor Royal; Cinema.

Speaking as a pensioner I think we have an excellent bus service, using my bus pass frees me up so that I can go out for a bus ride whenever I like. I can move with the human race without worrying about how much it's going to cost. The strength is that people can usually find work. Climate A strength is that Crawley is in the SE, the warmest and driest area of the country.

Recreation and Green Open Space The strengths are that the town has a wide variety of recreational facilities: large parks;

**Weaknesses:**

However, residents are very much attached to their cars and seem reluctant to walk or cycle.

Crawley sometimes feels like it's car-centric. I think this is in danger of becoming a bigger problem. However I worry about pollution from cars and planes

Constrained by our boundary

Transport, GP Surgeries, Variety of shops, Hospital;

Improve cycle routes. Extend the bus services and improve train services. Improve Three Bridges Station.

There's not enough leisure activities that cater to people/families on low income. Bowling, cinema etc. are too expensive for most people and although the parks in Crawley are pretty, they don't offer much when the weather is bad or you've been there every day because there is nothing else to do.

Maybe, better communication to all who use both to encourage all age groups, especially lonely/elderly and new parents.

Amount of traffic at times, lack of funding for school depriving the youngest generation of education about mental wellbeing (country wide) - maintaining land (unbuilt on) losing all our fields and natural areas - just becoming a massive housing estate and not a community supported town.

Rules on recycling, education on recycling.

Poor legislative powers to force industry to comply

Now becoming old and tired and needs fairly root and branch change.

Crawley is in danger of becoming too airport dependent to sustain future growth

Requires more infrastructure to support rising population.

Affordable housing

Overpopulated; sub-standard maintenance.

Trains very slow and crowded; Different times of houses (need £1m homes); Not enough family activities; Town Centre closing down; Need more Brands; Crawley Train Station needs upgrading more lines; Crime; Schools; Anti-Social Behaviour; Other Parks Badly Maintained/Tilgate is crowded.

When properties are empty you tend to gut it out, but in some cases you have no need to take such action: Hence 166 Ashtown Drive waste of money, adding to increase of use whereby some people would be grateful of the items left behind. Also if a property has been left in a good clean condition then there is no need to spend money on bringing in a team of clears. Providing new properties with sustainable and economic and carbon emission. Need to look at no long term.

Manor Royal and the airport are probably the keys to Crawley's economic well-being. Rising population and lack of car parking threaten to stifle the ability of people and goods to move around rapidly. The small geographical footprint managed by CBC is enabling developments outside of Crawley for which CBC cannot provide suitable services.

To be sustainable there must be adequate work, decent climate, housing, services, recreation, green open space, a community where people can feel at home and safe, and protection for wildlife diversity.

Work Crawley's industries (particularly Gatwick Airport) generate more jobs than can be serviced by the inhabitants of Crawley.

The weakness is that it relies on surrounding authorities to supply workers leading to a net inflow of commuters, giving rise to severe road congestion at peak periods. This, in turn, produces pollution from the related traffic.

<p>adventure playgrounds, skate-board park; climbing frames; all of which are free to the public to use. There are other good facilities (e.g. K2) that are not free.</p> <p>Wilder open spaces (such as the lfield Brook Meadows) are rare; but a strength is that some are protected and others can be.</p> <p>Other open spaces such as the farmland to the west of lfield is a strength from the point of view of sustaining a less polluted environment, the heritage of rural footpaths and the original vision of the New Town as a town in the country.</p> <p>Services (Medical, mental health, social services, CCG, schools) Medical practices, mental health teams, social workers, teachers etc. in all neighbourhoods.</p> <p>The proximity of Gatwick makes flying to a range of destinations (especially holiday destinations) easy (a strength).</p>	<p>The dependence of Crawley on Gatwick for work, increases the vulnerability of the town to the potential decline in air travel .</p> <p>However, the weakness is that this [climate] puts a strain on water supply and sewage disposal. In the longer term it is more vulnerable to climate change as a hotter climate may make it an unpleasant place to live. Parts are subject to flooding, but not life threatening flooding.</p> <p>A potential weakness is that they rely on the prosperity within the town to keep them afloat and well maintained.</p> <p>A weakness is that they can be overused as the population rises.</p> <p>A potential weakness is that they [wild spaces] are not all managed by the local authority (Homes England manages the lfield Meadows).</p> <p>The weakness is that it [open countryside to west of lfield] is under pressure for more housing, is owned by Homes England who want to develop it and is under the jurisdiction of Horsham District Council.</p> <p>Services (Medical, mental health, social services, CCG, schools). However, these are currently overstretched and without investment will remain a weakness and deteriorate even further as the population expands. So they are not sustainable without investment.</p> <p>The proximity of Gatwick also adds to the noise and fuel pollution, especially in the north areas of the town (weakness).</p> <p>Protection of Wild life The pressure on land is making this more and more difficult. Policies to promote this must be central to developments. Image Crawley still has an image problem (not justified). As a result, it does not persuade the variety of people needed to match the jobs available, to live in the town.</p> <p>Please see attached letter dated 16 September 2019 from Tim North &amp; Associates Ltd and Williams Gallagher for comments aligned to sustainable development.</p> <p>Notwithstanding its well-developed bus service network (as a means of sustainable transport), the town is economically overly dependent on an inherently environmentally-unsustainable transport node, namely Gatwick Airport.</p>
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**Council Responses:**

The council notes the identification of Key Strengths respondents associate with Crawley. The Local Plan seeks to protect, support and enhance these through its policies particularly the design and character policies; infrastructure and sustainable transport policies; economic growth, town centre and neighbourhood centre policies; and the open space policies.

The council notes the identified Key Weaknesses. Whilst some of these fall outside the scope of the planning system, policies in the Local Plan relating to good design to reduce opportunities for crime and fear of crime, increasing sustainable transport and links to the council's emerging Cycling and Walking Plan, town centre and economic growth, affordable housing requirements, and pollution control policies will help to address these issues as they apply to new development proposals.

The scope of the Local Plan only extends to cover use of land within Crawley's administrative boundaries. However, development of sites immediately adjacent to Crawley will have impacts on the borough's setting and infrastructure. The Local Plan seeks to establish these matters which will then be considered through the preparation of Local Plans of the neighbouring authorities should such sites be progressed, both as part of Duty to Cooperate discussions and as a statutory consultee.

**What should be the key priorities for making Crawley a more sustainable place?**

Major improvements to walking and cycling facilities, of the "mini-Holland" variety currently happening in many London Boroughs (Waltham Forest, Enfield, Kingston). Current provision is not at all "good" by comparison, in fact it is very poor with very few routes providing proper segregation of walkers and cyclists (Tilgate Drive and route from Peglar Way to Town Barn Road do this but most others don't).

I think it is important that there is way more walking, cycling, and transit infrastructure incorporated in to these new developments.

Continue to maintain the good balance between building affordable housing, a vibrant economy and green spaces. I do think Gatwick Airport should expand and expansion should be supported. It is wrong for individuals to say Gatwick should not expand. We need jobs and a sustainable economy in Crawley  
Not sure

Protecting our green spaces - providing more environmentally friendly resources - more ways to be economical and recycle etc. when out in the town etc. also have more education for everyone about how to support your local area.

Explain clearly what can be recycled. There are so many plastics that can't be (the film on fruit packs for example) and so many that can't be. Also give people education on reading the recycling signs on packaging because some symbols are deceiving and don't mean it's recyclable!

Improve infrastructure

Business rates lowered for companies offering 80% energy saving products, high employment, environmental friendly practices, etc.

Improvement in transport infrastructure and refocus on increased town centre residential combined with more mid to upper market leisure type outlets

Ensure development of Gatwick continues finding a way to get that 2nd runway Encouraging non-airport related employers in to the area

Better neighbourhoods with a mix of styles of housing especially for the elderly

Discourage further population growth. Support transport system improvements wherever possible.

Diversity of employment types • Policies that reduce dependence on car transport, such as cycle or walk to work for people who live within two-mile radius. • Improved public transport. • Resistance to expansion of the airport • Higher density housing of a good design, with a greater variety of types of housing • Policies that protect diversity of wild life • Policies that protect the environment

There are a number, but there should be no more building on Crawley's park and recreation grounds.

Priority should be given to reducing dependence on Gatwick Airport as an economic-growth contributor and, in assessing future employment and hence housing need, greater account taken of the likely impact of Artificial Intelligence (robotics) in replacing up to 40% of all jobs by 2035 - especially those in call-centres and warehousing which currently account for many Crawley jobs and a reason for its per worker GVA being lower than in neighbouring Horsham and Mid-Sussex Districts.

Keep a variety of areas. When it is full do not overload by over populating.

Halt further population influx. Improve green spaces. Upgrade existing properties with P.V.s

Improve travel to London.

Improve Tilgate Park/do more with the lake (its bigger than Centre Parcs (Woburn)).

Improve schools in Crawley – worst ed. funded in UK (bottom 10).

Crime like night drinking.

Bring in Tech companies into Manor Royal (Future Generations Benefit).

More Parks.

Homelessness in town.

Protect greenspaces

Improve neighbourhood parking.

Making sure "Transport" is good and running well. Shopping places and Retail Stores need to come into Crawley. More "BARS" are needed.

Houses for people born in Crawley.

Families should not be in flats.

Maintain Employment

Variety of shops, upgrade of Hospital, more GP Surgeries, Schools

Housing – ensure new housing provides not only flats for first time buyers but smaller 1 and 2 bedroom houses with gardens to provide better quality homes.

Building on my point above – special offers at K2 from time to time for the two groups I listed.

Traffic reduction

Making the hospital into a proper hospital again. Talking the pressure off East Surrey. For the elderly it would feel great to know that the hospital is not far away.

Heavy fines for individuals who don't up keep the properties in good order. Tackling drugs and homelessness. Look at working with the police and communities to reduce sex, drugs and alcohol crime. Hence drug dealing in town centre. Look at plans and ensure that disable people are priority in meeting their needs. This in turn will allow all, blind, dementia and learning difficulties to mix in community. More community and social groups. Exercise groups. Provide discount to shops who provide good access for disable people.

#### **Council Responses:**

The priorities for sustainable travel, affordable housing, protection and enhancement of open spaces, biodiversity and employment, encouraging sustainable and environmentally friendly businesses, town centre mix of uses, housing for older people and families, supporting people with disabilities and dementia and improved infrastructure and community facilities are noted. These are all aspects which are being progressed and expanded upon through this Local Plan Review.

**Is there anything in your local area which you feel affects your health?**

Probably air pollution, though I have no diagnosed problems. No

There is evidence of pollution on footpaths and buildings. The pace of life is getting faster which impacts on mental health i.e. less tolerance, people in a hurry, more cars on the roads

Roads being full of holes (dodgy potholes), broken footpaths that are dangerous everywhere. Overhanging bushes and trees which means pedestrians have to step into roads to avoid them as footpaths are blocked  
Selfishness, inconsiderate neighbours who only care about themselves and nothing or nobody else.

Not enough funding in our schools – got my child in Handscross.

Homelessness and drugs in Crawley big issue – no good for children.

Noise nuisance

Antisocial behaviour

Yes not enough rubbish because people dump rubbish in the street and old “Furniture”. There needs to be tougher rules for litter louts

Fast traffic on roads that have 30 mile speed limit.

No

Hospital, GP Surgeries

Green space – improves our health.

Keeping air quality under control and be mindful of pollution from Gatwick Airport.

Lack of GP and hospital space.

The traffic waiting with engines running when waiting for level crossing.

Narrow congested roads, pavement parking in Tilgate

Smell from Pease Pottage composting is often strong.

At the moment I can't think of anything that affects my health.

Yes! People dumping rubbish in our parks and pathways. People urinating in public area (hence more cameras in these areas). Needles in areas where children and vulnerable people use.

ID badges for workers and respect given to people with disabilities and illnesses when work is need to be done on their properties.

When grass areas are cut could you take on board disabled people who cannot clean up the mess that's left behind.

The High smell of take away companies that produce fat/oil burning odour.

Sign to remind people that spitting in public places is a crime. More sign for such things. More signs for the blind and disabled regarding toilets.

Yes - the fact that there is constant house building in my area - Kilnwood Vale, new houses everywhere - more houses up the Rusper Road, now plans to build 10,000 more!!!! It's all more chaos, more dust, and also more loss of the beautiful spaces we all love to enjoy!! Not to mention the fact that you can't get a doctor's appointment because they have SO many people and so it affects the treatment we get regarding health services etc.! I want my child to grow up seeing fields and trees and being about to play with his friends in a natural environment not on a giant estate getting into trouble as there is nothing to do!!!

Car pollution.

Airport.

Speeding cars, they are definitely not good for your health if they hit you.

No

Unknown. I believe with planes becoming more fuel efficient etc. planes will not affect our health as badly as traffic congestion.

Yes - constant noise from Gatwick Airport - especially airplane "go arounds" and traffic noise in Ifield Green which is now a major rat run to Gatwick.

Noise from cars, not the engine but the loud music people play.

No. It's quiet enough, rubbish is collected efficiently and there's fresh air in Tilgate Park.

We have answered this question in relation to Ifield Village Conservation Area. Benefits: living in a leafy low density area with considerable open space; access to farmed country side as well as the facilities of the town; access to a river (Ifield Brook and River Mole); access to local pubs and local theatre; active communities at the Barn and St Margaret's Church; a place that people want to visit for its heritage; area and buildings protected by conservation area laws, with another area protected by Local Green Space designation. Adverse: pollution from the airport; speed bumps resulting in excessive noise from construction traffic going through the village; litter and dog poo in the meadows and on the Village Green. Stress from knowing that the some of the features so valued are under continuous threat because open countryside is seen as 'empty space' to be developed by Gatwick or for housing.

No comment

I am affected by aircraft flying into Gatwick Airport when the winds are easterly.

Walking along the pavement when the road is busy. Traffic is very close to the road. Fear of being run over and fumes from the traffic

**Council Responses:**

New policies covering the issues raised above include SD2: Enabling Healthy Lifestyles and Wellbeing, DD2: Inclusive Design; EP3: Land Quality; EP6: External Lighting. Other existing policies have been expanded and updated, including EP4: Development and Noise and EP5: Air Quality.

The matters raised affecting health are picked up through the Local Plan policies, and are included in the overarching new policy on health and well-being. It is anticipated that by collating these under the health and wellbeing agenda, and requiring a Health Impact Assessment from qualifying new development proposals, schemes can design in from the start measures to ensure healthy new developments and communities.

The council is progressing a homelessness strategy which falls outside the scope of this Local Plan.

**What do you think the health and wellbeing priorities should be for Crawley?**

Getting people out of their cars.

I think Crawley Borough Council should definitely prioritise land specifically for social care/residential care development.

Encourage activity i.e. gyms, swimming pools, cycle paths, green spaces, sports facilities outdoors.

Promoting healthy lifestyles and healthy eating. There are a lot of older Crawley residents with poor health due to poor nutrition, smoking and lack of exercise. I see the adverse health effects on the population in Crawley through my work at Crawley Homes

Less pollution.

No more housing as it's full enough.

Re-open the hospital as a proper hospital instead of passing everyone over to East Surrey

To become more sustainable, economical and environmentally friendly.

To provide more doctors and services if you are cramming more housing in and to promote mental health wellbeing of possible!

Cutting down on carbon emissions. Push for more electric charging bays for cars.

More GP surgeries and reopen Crawley A & E.

I'd want to see 20mph speed limits within the neighbourhoods and a no cold calling stance, also we need to enforce the no alcohol in public policy. All these are anti-social and have a knock on effect to mental and physical health.

Retaining accessibility to nearby green spaces/countryside

Get an A&E back this town is too big and the plans for new homes massively help a bid to have an A&E back in Crawley.

To protect residents from the pollution and infrastructure demands created by Gatwick Airport Looking after the elderly

1. Support for homeless and distressed people. 2. More public toilets.

- Increase in medical facilities to reduce the number of over-subscribed GP services.
- Hospital with A & E that does not require a long journey to Redhill.
- Wider range of medical consultancy at the local hospital (dermatology has to be referred to Redhill, Horsham or Brighton; perimenopause/menopause have to be referred to London).
- More resources devoted to support within the community for mental health.
- Increase in means of addressing homelessness.
- Affordable housing including for those who are on Universal Credit.
- Measures to reduce loneliness

No comment

Reducing air and noise pollution, from ground-based HGVs as well as airliner traffic.

Green space where you can see some distance and feel the space, also where wild animals may live such as deer badgers and foxes. Roads or paths that are pleasant to walk. Tilgate Park is good. Also it's by K2 which is also good.

Train the Neanderthals at the town some manners and better attitude towards others.

High level of drinking not good/reduce number of pubs/bars.

Focus on family activities and children in schools/sports etc.

Sort out the drug problem.

Homelessness and begging in town.

Get Tech firms into Crawley Manor Royal. Happy to support [\*contact details provided\*].

Need a second runway.

Involve

Encourage

Make services accessible to all.

Keep cost as low as possible for users.

Yes not enough rubbish because people dump rubbish in the street and old "Furniture". There needs to be tougher rules for litter louts.

Healthy living fitness

Accessibility

New hospital or expand Redhill

Keep green spaces accessible and keep the green spaces for the residents. Do not give to developers.

Improve and promote good health.

Ensure GP surgeries open in new developments.

As I mentioned earlier: could we look at Community Veg plots – I live in West Green – I'm aware new homes opp. Asda by St, Wilfs School with no gardens and it would build 'community'.

I'd like to see as well 'overflow help' for Open House, especially Nov – April (get Churches working tog) it has been discussed but NOT happened!

More state run nurseries for working mums including single mums.

Clubs for the elderly without it being patronising.

More trees; seating for disable people. Allow people to feel safe in communities. Transport. More 205 bus.

Homes for disabled and dementia people. Doc Demential Sude NHS. Dematige. Housing Working Group

Sept 2017 ARE WE NEARLY THERE YET

Accommodation options for older people who have dementia.

### **Council Responses:**

The Local Plan seeks to introduce additional measures to promote active travel as opposed to use of private vehicles, whilst ensuring better transport connections are secured.

The Local Plan, through its affordable housing policy and build to rent policies seek to make housing more affordable, furthermore, the government's standard methodology calculation includes an element of uplift to redress the affordability balance. This is the total housing need figure which should be met across the housing market area.

The Local Plan includes new policies to support economic growth, particularly in relation to supporting the borough provide a stronger/more highly-skilled local economy.

The Local Plan protects positive elements of the local environment: green spaces, parks, access to the countryside.

The Local Plan continues to seek to address air and noise pollution, and expands on the previous policies.

The Local Plan through its design, infrastructure and housing policies seeks to ensure greater attention to and provision for groups with specific needs: the homeless, older people, people with dementia, people suffering from loneliness or poor mental health, insofar as these can be addressed by the planning system.

Whilst new facilities may not be delivered directly through the Local Plan, the associated Infrastructure Plan and S106/CIL contributions can assist in securing better facilities (sports, gym, school provision) for exercise and physical activity and community facilities (such as community gardens, nurseries, public toilets, and better access to primary and secondary health facilities) where these are identified projects.

Matters outside the Local Plan's direct influence include negative impacts associated with unhealthy lifestyles: poor nutrition, smoking, inactivity; problems around rough sleeping/antisocial behaviour/littering/drug abuse and the affordability of services.

## **WELLBEING & COMMUNITIES: CHARACTER & DESIGN**

### **What do you think is valuable about the areas you know in Crawley?**

Neighbourhoods give local identity and sense of belonging

Easy to get from one part of town to another. Transport networks good. Like the green spaces and preservation of trees.

Adventure playgrounds - play parks and areas of green for the kids to play and communities to gather - children and family centres and libraries.

Small, safe, convenient, friendly, useful, accessible.

Tilgate - all the grass areas both with and without trees. These include the squares and some of the verges.

The playing field - well used for sports activities and by families, dog walkers, young people.

Ok ish

Improved town centre has been great. If you make a place look a modern and nice certain way it encourages people to go out more and less likely to want to deface and so criminal activity.

Good housing although a need for more 4 bedroom houses.

That they are safe for people and wildlife

Retention of as many green spaces as possible

Places such as Tilgate Park and Buchan Park. What a wonderful place this is for all kinds of reasons. There is something for everyone there. A quiet walk, a run, meeting with friends, a bike ride, the forest, the lake,

The wildlife, Go Ape, the huts.... And more. It really is fantastic.



The parks should have the highest protection possible Tilgate, Worth, Millpond all need maintaining and protecting  
 Plenty of shops, two libraries, churches It's wide array of individuals  
 The green spaces accessible to the areas of quite dense housing. ease of access to rural areas  
 Less built-up; i.e. greener than some other areas.  
 Woodland areas in W/a ET/G F/G including parks  
 Shops/parades  
 Historic Places  
 Old Pubs  
 Libraries  
 Churches  
 Bus Stops  
 Road Signs  
 The neighbourhood principles i.e. Shops, doctors, schools, playing fields (village centre)  
 Gatwick  
 Small shopping parades per area in Crawley.  
 Green spaces for each area.  
 Schools per neighbourhood.  
 Green spaces, Tilgate Park, Local shopping parade with small independent retailers.  
 Tree-lined residential roads.  
 Places to sit out in town centre, and play table tennis.  
 The fact that they have a parade of shops and community centres.  
 Work to be done on improving areas that have high crime. Deprivation. Lack of afterschool facilities.  
 Community encouragement groups needed. Other areas have natural outstanding beauty and these areas need to be promoted. Great library! Need a university and new hospital.  
 Tilgate has clear boundaries on three sides so that residents see it as a distinct place. The Parade is one of the best in Tilgate and can provide most of the shopping needs of those who have difficulty in travelling further afield. The Community Centre and Men's Shed are valued community assets.  
 Ifield Village Conservation area: Green space; open space; heritage in buildings, artefacts and road layout; relatively large houses and gardens. Walks from the village into the surrounding countryside  
 Using circular routes Walks through the meadows along Ifield Brook and River Mole (mixture of public footpaths and permitted pathways). Country walk from Ifield to Rusper – mainly via footpaths. Level of protection from designated Conservation Area, SNCI and Local Green Space – this gives some peace of mind that the character will be maintained. Cricket on the Village Green. Diversity of wild life: (freshwater crayfish and mussels in the stream; great crested newts in local pond; small mammals, such as field mice; variety of birdlife – kite, heron, egret, kingfisher, buzzard, skylark, nightjar and screech owl, as well as many garden birds; a variety of butterflies and moths (some rare); deer, rabbits and foxes. Ifield Neighbourhood as a whole.  
 Train transport direct to Crawley, Three Bridges, Gatwick and Horsham. Also to the coast and to stations to London and beyond. Bus transport to Crawley Town Centre, Gatwick, Manor Royal and Horsham, Dorking and Box Hill and East Grinstead. Ten-minute walk to Ifield Parade from most areas of Ifield; half hour walk to the town centre. Half hour walk to Town Centre or County Oak. Other areas Easy access to: Library; Museum; Hawth; Parks; Town Centre Mall and Queens Square.  
 Bus and train service is good. Shops are local. Appreciate the wild green spaces to go for a good long walk.

**Council Responses:**

The Local Plan seeks to protect the neighbourhood principle and the neighbourhood parades/ neighbourhood centres.  
 The Local Plan protects existing infrastructure unless re-provision is made or it is evidenced to not be needed.  
 The Local Plan seeks to support the emerging Crawley Transport Strategy and secure improvements to the sustainable transport infrastructure of the borough.  
 The Local Plan protects the open spaces and recreational facilities. The Open Space, Sports Pitch and Indoor Recreation study will update the evidence for the implementation of these policies once it is completed.  
 The Local Plan introduces an expanded policy and supporting text to the trees and landscaping policy. It establishes the principle of net gain in biodiversity, securing at least 10% from each new development, in policy.  
 The Local Plan protects the heritage assets of the borough.

Through the housing policies, including the housing need, housing sites, housing typologies, housing mix, affordable housing and build to rent policies, and the design policies, including the space standards, the Local Plan seeks to secure decent housing and gardens.

The Local Plan seeks to support and build upon the town centre improvements, through the separation of the policies relating to the town centre being established in a separate dedicated chapter.

The New Town's relatively spacious character is recognised as being a strong asset for the borough, and retaining the positive aspect of this is a key requirement of the Local Plan design policies, whilst maximising the borough's ability to meet as much of its development needs within the administrative boundaries as possible and increasing densities in line with government policy requirements.

#### **What are your neighbourhood's defining characteristics?**

Security. Peace. Rooted in Crawley.

Walkability is a wonderful part of my area of Langley Green. The redevelopment of the Parade around 10 years ago has been successful in creating a more cohesive, accessible, and attractive space which feels more community-oriented than before.

West Green - Surprisingly quiet although close to town centre. A lovely park. Lack of parking for residents Beautiful mill pond, lovely wild flowers at the moment, church and green areas and lots of lovely woodland Quiet, peaceful, respectful

Nothing Northgate is quite old and not much gets spent on here The green areas - visitors are often surprised how green Tilgate is

Yes Milton mount park is lovely. Easily Accessible places for walking dog. Housing

The church and an ageing community, Furnace Green.

I live near one of the outlying villages and it is vital that the green nature of the area is retained

The overwhelming smell of drugs being smoked usually. Many undesirable people hanging around. Lack of police presence, untaxed vehicles left for months, rubbish not collected regularly because others don't dispose of it correctly, grass verge out my back door not having been cut all summer... To name a few of the delights of Bewbush.

Low crime rate nicer people than other areas (Pound Hill)

Broadfield Hub in the library

A massive park and forest

Mixed area of some of the oldest and newest housing. A good characterful neighbourhood with mostly friendly people

Ifield is under constant threat of being the meat in the sandwich between Gatwick's uncontrolled growth and the Homes England plans to build 10,000 homes on land west of Ifield. The conservation status of the area is meaningless if it is to be surrounded by uncontrolled growth elsewhere

Tilgate has an economically diverse population as suggested by the evenness between the main parties' results in local government elections. The buildings are mostly first generation new town terraces, creating a particular character, albeit not a particularly interesting one. Tilgate feels safe, even at night. And, of course, Tilgate Park is the icon of Tilgate.

Heritage (buildings and layout) that is worth preserving from the pre-New Town era. • Open space and green (gardens and hedges as well as open spaces) • Low density housing • Strong Conservation Committee with a long history of working to conserve the character of the area.

Greenery.

Goffs Park; Train track

Tilgate Park/woodland; Green spaces

Very good for trees, grass, green areas

Self-contained

Not Good

Pound Hill/Milton Mount – the park, the shops.

Narrow roads

Tilgate Park

Trees

It has a village feel about it.

Greenery, trees, space (open) facilities for elderly and dementia (Age UK, Hospital, shops, pubs, path to Sainsbury and community park (West Green) paths and slops for wheelchair access (could do with improvements).

#### **Council Responses:**

The feedback provided is noted and welcomed.

This will form the early stage of evidence gathering to support the local character assessments.

#### **What don't you like about parts of Crawley?**

High density of new developments

Crawley, in places, is still too car-centric. This is worry that has only grown with developments like Forge Wood which I think are in danger of becoming insular. At times, Maidenbower also feels insular.

Litter! Some parts of town are run down i.e. The Broadway and Fennel Crescent area and Aston Court area in Broadfield are very down at heel

The fact that they are building so much HOUSING on the green areas!!! Under passes which can be scary and horrible to walk through sometimes! Cheales round about road works (literally has been so many months now!!!!)

Crime, rubbish, intimidation, graffiti

The rubbish and the lack of community things to do

Tilgate - the parked up roads. Although I hate to say it, I think some greenery may need to be converted to parking. A lot of tradespeople live here and many houses have at least one car plus a van

All ok

Need more wildlife conservation and sanctuaries. Too many chain stores. Need a lush and support for plastic free supermarkets and grocers. Would be great to go to a store that have loose fruit and veg and decrease plastic waste. Reigate has one of those stores and is thriving.

Town centre looks very dated.

Like Tilgate park, Furnace Green, Pound Hill, Ifield and Worth

The town centre is tired and broadly contains too many lower market retailers/leisure outlets (restaurants etc.) to make it an attractive place to shop and or come to for leisure activities

The crime and lack of police presence that makes some of us either afraid to go out or nervous of going out. No one should feel like that.

The amount of betting shops in town makes Crawley feel like it's just full of gambling addicts. Who the hell needs 2 of the same betting shops within 3 mins walk – Coral's High St. and Queens Square utterly ridiculous force some to close if needed make the rent free give it to a nominated charity for Crawley.

Unsafe at night - I never go out at night

The station, the college, a lot of the ugly 60's architecture need to be removed to help bring Crawley into a modern bustling town.

Lots of wasted space that could be used for various different facilities.

Odd neglected areas e.g. rear of the High Stand opposite to Orchard House in Pegler Way. Verges being damaged by vehicles, particularly heavy ones in winter.

It is too crowded and the shopping areas are lacking any character or unique shopping outlets. The town centre has been ruined by the recent redevelopment and the money spent on it could be better used elsewhere

The historical?? High street is one of the least interesting I've encountered. Despite have some nice old buildings it just doesn't work. Queens Square (AKA Bland Square) was an opportunity lost. I dislike driving in some parts of Crawley, especially Langley Green.

Locally in IVCA: a shop (in Ifield Green) that gets burgled frequently; motorbikes being ridden on Ifield Brook Meadows and sometimes on the Village Green; people lighting fires in the meadows and leaving litter. Locally in Ifield neighbourhood: Areas that look neglected and become dumping grounds (e.g. dilapidated garages; areas behind the shops on Ifield Parade).

The homeless people who sit in the town and drink alcohol out of plastic bottles all day. The layout of the housing, car parking and garages in Broadfield scares me.

Lack of maintenance (chewing gum) and general lack of care.

Drugs/state of the areas with crimes, drugged out people on shops parades in the day time as children go past.

Overcrowded building

Uninspiring architecture

Historic, clean, wide roads

Too many flats.

parking on verges

Destroying local historic building - cinema

Shops, my neighbourhood – West Green, hospital, building

Shabby housing, unkempt areas.

Increase in crime.

Town centre – lack shops.

Litter

Too many mass market cheap shops, who don't care about Crawley, in Town Centre.

I don't like the litter that clutters the streets. We need more rubbish bins.

Tipping, dumping of waste, rough sleepers, homelessness; drug dealing and seeing neglect of mental health individuals.

**Council Responses:**

The feedback provided is noted. This will form the early stage of evidence gathering to support the local character assessments. Some matters raised fall outside the influence of the Local Plan.

**Are there any places you think would be improved by change and new development?**

Area around Three Bridges and Crawley stations

I think the very expensive paving and fountains in Queens Square is not addressing the run down appearance of this part of town. I would like to see some bars and more places to eat in Queens Square.

More independent cafes in green spaces. The Broadway also needs some TLC, it is very shabby

The part of the town where the bus lane is (where index used to be) in the town up from Wilkinson! Half of it looks abandoned!!! I think that they could have more recycling bins etc. around and more use of natural materials other than plastic

Empty shops and multiple charity shops in town centre

It would be nice if Northgate could have a new park as there is not much here for the children to do Tilgate Parade. A larger grocery shop would save trips into town. Different planting in the flower beds alongside the Parade car park. Flowers and plants to attract insects and even a few trees like apple trees, the fruit of which residents could benefit from

Crawley Borough Council office need updating and a new fire station

Crawley hospital

Town centre

Every neighbourhood could benefit from no cold calling zones and 20mph speed zones near schools, parks, GP Surgeries and shops.

The huts in the neighbourhood parks could do with some improvement and availability to be open. Toilet facilities in these areas would also be beneficial.

The town centre and immediate environs need major redevelopment

Broadfield shops. I know it had a makeover, but honestly... You'd never notice it had been done. The blue pillars on the covered walk ways had been painted white and that's all that's visible! Cheals roundabout.

Seriously..... What on earth was that all about??? All those months and it's basically exactly the same as it was. Oh, except a new shiny path and some exceptionally dangerous crossing points for the school kids to take their chances!!!

Broadfield? Plantain Crescent is full of houses requiring constant works and alleys for criminals to hide and run away. If no major changes are made at least close the alleyways and give the people 2ft extra garden if need be.

No

Old Thomas Bennett land would be great for other sporting facilities.

Goffs Park needs accessible toilets near to the level crossing car park - and facilities for the model railway volunteers

no - we have had enough of change and new development and it is time to call a halt on it

The High Street really needs a rethink and a long-term plan. The gradual move of office-based and retail businesses out of town centre is a problem common to many towns but it may be possible to reverse the trend with appropriate services

Every neighbourhood has a Community Centre. Many function principally as 'Hall and rooms for hire'.

There is nobody based at most of them. Hence they are impersonal buildings without people to take a pride in how they look or to stimulate more of a community feel around them. Is there something to be learned from the few neighbourhood centres that do have a permanent staff presence at the building?

The entire town might benefit from both population reduction and modernisation (P.V.s etc.)

Local parades

More trees.

More street life writ small.

Not sure

I would like to change the facades of the buildings in Queens Square / Town Centre. They look tired and [vaay]

If more people are living in Crawley we would need medical facilities, shops and schools.

Building should be modern.

Parts of Broadfield and Bewbush need investment. Increase police presence in areas that are known to have issues both criminal and social needs.

Thomas Bennett Canterbury Road derelict site could be developed as extra parking for K2 and Tilgate Park – 2 regional attractions bringing extra traffic.

Although it's good to have grassy areas near our homes, but some of them could be removed and replaced by parking areas.

New hospital; university needed; dementia outlets; health centre advice in town. Allotments in new build. Old police station and unused properties put back into use. Bring back (A) Market.

**Council Responses:**

The locations referred to in the representations received are noted and will be taken into account as part of the preparation of the local character assessments. The Crawley Growth Programme and the Town Centre Regeneration Programme, outside the remit of the Local Plan, are investing in further improvements to the town centre, Manor Royal and Three Bridges.

**What makes higher density areas like St Peters Road and Brighton Road attractive?**

Old established housing  
They're necessary in such a busy centre. St. Peters and the adjoining St. Johns Road also offer high densities with an excellent character of older stock-feels like an oasis.  
Relatively litter free. Quiet ambience. Milton Mount flats are definitely not attractive, they are an example of higher density, high rise block that should not be replicated.  
Not sure  
Good design, well managed, social responsibility Nothing  
All  
Modern design  
To be honest, nothing, they all end up becoming rat runs and crime hot spots, NK  
Are they attractive?? Not in my opinion. don't know  
Trees and grass verges Not attractive at all to me  
I think that Brighton Rd has lost much of its character. The best bit is between Southgate and S West with the bridge crossing Hoggs Hill  
Nothing .....

Is Brighton Road attractive? Character streets from St Peter's Road often result from small parcels of land being developed by different people rather than grandiose developments of whole neighbourhoods. Buildings of a more or less similar period enhance the charm.  
Are they perceived as 'quaint' because they precede the New Town? Most are Edwardian/Victorian Buildings. There is also a small green by the Church.  
They are close to town so they could walk out and be involved in activities in the town easily.  
Nothing comes to mind.  
Nothing  
Close to Town Centre  
Not sure  
I don't find these areas attractive.  
I'm sorry I don't know these roads.  
Nice looking buildings, location to facilities and transport.

**Council Responses:**

Comments received highlighting character assets such as trees and verges and good design are noted. The Local Plan policy relating to increasing densities seeks to ensure these matters are taken into account when considering development schemes.

**Where in Crawley should higher densities be allowed?**

Town centre  
I am perfectly content with densification, as -when done properly- it encourages walkability and mass transit use. I tend to think Crawley is dangerously close becoming endless sprawl.  
Town Centre and the centre of some neighbourhoods i.e. shopping parades  
Places where they are least overshadowing other things  
No problem with continuing to refurbish office space for residential housing if well managed in terms of regulation  
Anywhere they can be  
In the town centre so there is a mix of residential, retail and food outlets  
All  
In already high-rise areas. Town Centre flats  
Nowhere, Crawley is at bursting point, surely anyone with common sense can see this.  
In particular younger people now want to live close to retail/leisure/restaurants etc. so higher densities should be encouraged within the town centre  
Plenty of empty offices in town. Soon there will be plenty more empty shops if you keep putting the rates up so much!  
Ifield – Horsham want to build 10k homes on the edge anyway  
Town Centre

Town centre sites and near stations. Manor Royal  
 Where former commercial buildings are now surplus to requirement e.g. N side of the Boulevard.  
 Nowhere  
 If the 1950s could be revisited I'd suggest a high density area adjacent to suburban/neighbourhood shopping centres but perhaps it is too late for that?  
 Is there an opportunity near to County Oak?  
 High density residents need more access than the rest of us to parks, pubs, churches, public halls, allotments, shopping centres so should not be encouraged in places away from these services.  
 Where there is easy access to public transport, schools and medical practices so that the higher density does not mean more cars. Children walking to school is important. There also needs to be easy access to open spaces, as higher density houses tend not to have their own gardens.  
 In town only as is normal development.  
 None.  
 Outside – like Forge Wood – but toward Turners Hill and Ifield and W/G near the park.  
 Industrial estate.  
 Not sure  
 Close to Town  
 Nearer town centres  
 Where it doesn't adversely affect existing residents.  
 More homes should be built near K2 leisure centre.  
 Near the town; i.e. train station. Old night club area.

**Council Responses:**

Areas such as the town centre, neighbourhood centres and near train stations are noted – these are considered to be the most sustainable locations for the highest densities and are recognised as such in the Local Plan.  
 Other locations such as Forge Wood, outside of Crawley's boundaries and near K2 Crawley are noted.  
 Employment locations such as Manor Royal and County Oak are noted, and, whilst not suitable for housing, may be suitable for high density employment uses, subject to sustainable transport and infrastructure capacity.  
 Comments relating to the needs for access to facilities and open spaces in higher density areas are noted.

**Are there areas in Crawley which should be protected from higher densities?**

Any of the older neighbourhoods.  
 Around schools  
 Not really, other than maybe the very outskirts of the built-up area and around the fringes. Ifield Conservation Area. Other than that, infrastructure-permitting- low rises would be useful.  
 The historic part of the High Street, historic parts of town i.e. Ifield Street, Hazelwick Road area and older parts of Southgate  
 Not sure  
 Every area to be assessed individually. However, it would be helpful to have the council's support to oppose the proposed traveller site approved by our neighbouring council but bang on the border with Pound Hill and (in light of recent sad news and arrests from other parts of the UK) the devastatingly negative impact this would have to our neighbourhood.  
 The parks  
 All  
 Wildlife areas! Large stretches of land.  
 Maidenbower, Pound Hill, Furnace Green, Tilgate.  
 All of it.  
 Not particularly - since lifestyle changes in recent years result in a desire for higher density to make property-owning more affordable. Garden space now not such a priority as in post-war years.  
 I think all areas should be protected. There is very little parking. Take Langley Green and the old scouts hut. That took away lots of parking for many surrounding residents. Now there are a couple of Mercedes (not bad for 18 council houses) parked in there and plenty of empty spaces. Yet the local residents are struggling to find places to park. Then they park on verges and then it all starts becoming dangerous for motorists. And this is happening all over Crawley.  
 North Pound Hill, although I believe that's too late, and anywhere that others think suitable for a traveller site, protect those and ensure that never happens.  
 New developments  
 Current low rise residential areas.  
 Areas of beauty should be left well alone  
 Proximity to the High St and Worth Church.

Land surrounding roundabouts e.g. Cheals

Yes - all of it

If higher density residential units are low rise it should generally not be a problem but there may be a degree of mismatch if placed immediately adjacent family-style housing. There are "neighbours from hell" but hopefully good building design can minimize negative impacts on existing residents.

Places far from local amenities.

As you head away from town the density should lessen.

All of the Green Spaces should be protected and improved by additional tree planting.

Not if planned well, Green areas etc.

Parks

Residential areas.

Not sure

Conservation Areas

It would be a shame to repeat the eyesore of Milton Mount flats on the edge of Worth Park.

Retain historic building when converting to housing.

Yes, none in the town near the shops.

Yes. Tilgate, West Green, Southgate.

Areas that has wildlife and outstanding natural beauty.

**Council Responses:**

Comments received regarding the neighbourhoods, and Conservation Areas are noted. These will be considered as part of the character assessments.

Protection of the green spaces, wildlife areas and Area of Outstanding Natural Beauty is noted. The Local Plan policies seek to ensure this is the case through specific policies (CL8, CL9, OS1 and OS2, GI3 and GI4).

**WELLBEING & COMMUNITIES: LANDSCAPING & LANDSCAPE CHARACTER**

**What soft landscape features do you particularly value in Crawley?**

Large green spaces in the older neighbourhoods. Tree lined roads

The recent changes to the Town Centre's pedestrianised areas including Queens Square exemplify the New Town with a 21st Century twist which embraces accessibility to public realm.

Tilgate Park is always beautiful whatever the time of year or whatever the weather. Litter is rarely seen. The lake and the planting in the park is always lovely.

All the beautiful areas around Ifield and wild flowers (go Crawley!!) the trees are a favourite of mine and the areas like the memorial gardens and spaces that have clearly been cared for like the mill pond in Ifield and Bewbush with all the lovely areas of trees and wood carvings

Planting on the railing in the central reservation from Three Bridges through to town centre

Tilgate park

The parks. The green spaces incorporated within housing areas

All

Milton mount gardens, pergola and fountain and flowers

Memorial gardens

The grass verges, if these went to become parking bays it would radically change Crawley's look in a negative way.

New Queens Square is lovely

Trees and grass areas

Tilgate forest

St Peter's Church area with the New Town abutting a Victorian area.

Goffs Park Road, but the former nursing home sites look very sad

it's rural surroundings

The occasional mini-park, like Victoria Park on Ifield Road, can be a delight when well-maintained. Tree or shrub-lined footpaths connecting roads or cul-de-sacs are very pleasant.

Apart from the open spaces (conservation areas, parks and farmland) that have already been mentioned, we would add: connected greenways that are well maintained. The maintenance is important as sadly, parks, fields and greenways are seen by some people as places where rubbish can be dropped and dogs can walk without owners picking up dog faeces.

The flowers in the park in the town centre. Wild flower planting that has been done.

General Greenery at all kinds e.g. self-maintaining wildflower verges and other grassy areas.

N/A

Guess – trees!

Not sure

Parks but grass verges should be cut properly and more often.  
Flowers bedding plants  
All areas  
All the parks in Crawley improve resident's life.  
Ifield and Worth Park are historic places that must be protected.  
Approach roads lined with trees and grass and shrubs and no house frontages visible.  
I value all the areas with soft landscaping in Crawley.  
The plants, the lawn, the trees, colour. Combination of a garden. Vegetative materials.

**Council Responses:**

Responses show that trees, access to parks and pedestrianised areas which include soft landscapes are important to responders. These are considered positive when well maintained, legible and connected and is achievable through urban design.  
Wildflower gardens can be considered a low cost alternative to high maintenance gardens. An additional issue with additional planting in communities is the necessity to train and cost of maintenance as well as curating seeds.  
There is a discussion on whether grass verges should be cut short or cultured to grow into soft landscapes like wildflower meadows which provide a higher degree of natural capital and contribute further to green infrastructure.  
The structural landscaping and soft landscapes of Crawley identified as trees, grass and shrubs but also species rich habitats are vital contributions to the town and the Local Plan includes policies to protect it.  
The visual amenity value of plants, lawns, trees and the colour they provide can be protected through Policies CL6 and DD1, DD4 and DD5.

**Are there areas of Crawley which would benefit from more trees and/or soft landscaping?**

New neighbourhoods  
Land north of Langley Green built up area, south of the scope for Western Relief Road might be a good way to provide some protection from LGW noise pollution.  
Forge Wood needs many more trees. Trees soak up pollution and minimise noise  
Three Bridges/Pound Hill and some areas of Broadfield. I just think parts of them look so unloved.  
Trees removed from town centre, maybe replace them?  
Broadfield  
Bewbush  
Can't think  
Most of it honestly! Serious concern  
I'm sure there are.  
Three Bridges station and tee junction, looks horrible.  
There is a greater need for trees in all areas to assist in climate change remedies. Urban roads should also have a greater number of roadside trees  
Most areas would benefit from more trees and landscaping. The problem is, you've already taken it all away to build.  
Gossops Green seems to lack trees etc.  
No  
Town centre  
Pegler Way  
All of it  
Anniversary Park in West Green is an embarrassment.  
Bewbush and Broadfield.  
Three Bridges area by the station is a big lump of traffic and tarmac. But I guess not much can be done due to limited space.  
All available spaces in all communities would benefit from additional planting.  
Langley Green, West Green, Broadfield etc. AW  
Yes, anywhere there aren't any.  
Yes all areas  
All areas  
Town Centre  
Three Bridges Station  
Bus Station area  
I think round Broadfield would be nice. As this area has a bad name and unfortunately it sticks, so make it look pretty with flowering shrubs and trees.  
Langley Green.



**Council Responses:**

Specific neighbourhoods have been identified as areas where more attention is needed to the level of green infrastructure within the urban realm.

The Local Plan includes policies to provide a mechanisms for developers to increase the amount of soft landscaping on and around new development and will take into consideration the future needs of the three neighbourhoods mentioned as well as other neighbourhoods.

Soft landscaping/growing areas on top of bus stations is a further example of incorporating green infrastructure into the urban environment.

Flowering, shrubs and trees can be encouraged through the emerging Local Plans Policies CL6, DD1, DD4 and DD5.

The Green Infrastructure SPD Appendix 6: Suitable Plant Species for the Crawley Area lists the tree species, ground cover plants, shrubs and hedges as well as security plants that are suitable to be planted in Crawley.

**WELLBEING & COMMUNITIES: HERITAGE****What does 'heritage' mean to you?**

Heritage to me is incorporating historic features and structures in to the larger picture which respects the history, but embraces moving forward. A great example is the restoration with the Tree (Boulevard/High Street).

Good upkeep of important historic buildings. Preserving ancient trees and rights of way Important - history – architecture.

Cultural history for the area.

Historic sites and buildings such as Ifield Water Mill but also more recent heritage sites based around Crawley's famous people such as Caroline Haslett.

Nothing

History passed down

Old buildings

Not much these days, it's a lost concept in modern life.

This is an important feature to all and the limited amount of genuinely heritage assets in the locality should be protected

Keeping the old buildings and characteristics. Keeping memories alive. Sadly, Crawley Council have taken lots away or it's been left unloved and derelict.

A building or place that has deep historic ties to the town where things used to happen or still do.

Old buildings which are well looked after.

Reputation built over decades.

Heritage to me means the record of the generations who lived and worked here before us. It means the track ways as well as the buildings.

Heritage does not mean Crawley to me - any heritage the town had has long since been destroyed by CBC and the planners. They need to look to Horsham to learn what heritage means.

I'm personally attracted old buildings and localities which have a story to tell.

Heritage is those features that are of value to maintain and pass from one generation to the next. It can include: buildings of different styles and ages; town design; facilities; cultural traditions; open spaces; resources and clean air. It can also be knowledge –much of what counts as heritage only acquires meaning to the next generation if its history and significance is also passed on. Heritage is also to do with the natural world. Is there a co-ordinated data-base of the wild life in the area? There may be individual small-scale studies but we are not aware that they have been co-ordinated. There is a naturalist in Ifield who has documented local wild life over a long period.

I don't feel the heritage in Crawley. Although occasionally I notice some more older buildings in the high street.

History, Tradition, Feelings of Pride of Place.

Celebrating everyone History town, people that make it, Muslims, Hindus, Sikhs etc. all.

Being able to see if the history of a place in front of me when I walk around. Knowing what the history is in the first place.

The historic parts of the town area that it is well known for.

History

History (Historical)

Customs, churches, historic buildings, history of the town. No shame in keeping traditions going.

Museum.

Did you know before Crawley was a town Oliver Cromwell made camp here with his soldiers. He said "MOUNT UP MEN THIS PLACE IS EVIL" what he meant by that I don't know.

History of the town. Neighbourhood trail. Preservation of history for generation to come.

**Council Responses:**

There is considerable association of the concept of heritage with buildings and features dating from the pre-railway era, such as older buildings on the high street and Ifield water mill. This is consistent with the association of heritage with antiquity, which is a feature of the national framework for identification of 'designated' heritage assets. Most of the specific buildings mentioned are listed and as such enjoy statutory protections.

There is some association of heritage with natural features such as trees and wildlife, as well as rights of way. Policy HA1 acknowledges the overlap of heritage significance and biodiversity value in respect of certain natural features. Historic man-made paths, roads, trackways etc are specifically recognised as elements of Conservation Areas and Areas of Special Local Character in the relevant policies and in associated Conservation Area Statements.

There is significant reference to concepts which are not directly architectural/ aesthetic, but relate more to social values invested in the local environment: 'tradition', 'customs', 'reputation', 'pride of place'. Also reference to the different religious traditions which exist in the town, and particular notable Crawley residents. The importance of these more social, communal and 'intangible' associations underlines the importance of local heritage designations which can take account of social and communal value.

There is also some emphasis on legibility of historic built environment: being able to 'see' and 'know' the history or 'story' of a place. This highlights the role of the task of 'better revealing' heritage assets, which is an area with clear scope for the enhancement of heritage significance.

Some responders have difficulty in associating heritage with the more modern elements of the town or indeed with the town generally. This is a familiar issue in respect of much twentieth-century heritage, but suggests there may be scope to enhance the way in which more recent elements of Crawley's heritage is preserved and revealed.

**What aspects of Crawley's heritage are most valuable?**

I particularly enjoy how listed buildings have really harmonised within modern surroundings.

The High Street (apart from the empty premises). I also like The Street in Ifield and Victorian housing in Three Bridges and Southgate. I cannot get too excited about New Town architecture but I am aware it is important and merely 'out of fashion'.

History of the town - the museum, the areas like Tilgate Park and places that we all used to go to as children and now take our children, the Band Stand and things that show history like the older buildings being maintained and respected

Historic buildings and more recently the airport buildings etc.

The churches

Nothing

Old High Street

Old churches.

Modern living

Those buildings and artefacts that pre-dated the development of the New Town Tilgate Park. The old buildings like the Punch Bowl and the old Citizens' Advice place.

Unknown

Crawley High Street

Our location

To me, the Ifield Meadow providing a rural link between the Watermill and the Church and lovely buildings in and around Ifield Street. In Goffs Park, I think we owe it to the Old Town families to record the War Memorial aspect of the former cricket field (Land Swap with NTC for Queen's Square)

None

Crawley St John and Ifield churches are probably the most important buildings but The Tree (museum) is not too far behind. Unfortunately the pre-New Town village was lost other than scattered buildings, mostly altered. Although more recent, the Dyers Almshouses are noteworthy.

The Heritage Study of April 2010 was useful in identifying items of value (Baxter, Alan, 2010, Crawley ASEQs and Locally listed Buildings: Heritage Assessment. Prepared for Crawley Borough Council.)

Heritage has to do with retaining samples of different ages that have influenced Crawley. There is heritage in some of the New Town architecture and layout of estates that are worthy of note.

A healthy environment in terms of air quality is an important heritage for future generations – as well as the diversity of species that inhabit the slightly wilder areas.

Nothing comes to mind.

Our people Daly Thompson, Alan Minter, Romesh

Hospital  
High Street  
St. John's Church  
West Green  
Ifield Green

The historic parts of the town area that it is well known for.

Old parts of Tilgate/West Green

Older buildings in High Street

Churches and there could be more.

All – we must progress but not to the expense of our heritage.

Historic parks like Tilgate Park need support to maintain flora and fauna. Over-commercialisation is spoiling an important resource.

The old areas like West Green, Three Bridges and the old station masters house on Gales Drive.

Pubs, hotels, trails and all linked history.

**Council Responses:**

Widespread recognition of importance of pre-industrial heritage in terms of the older (including Listed) buildings on the High Street and in Ifield Conservation Area, and recognition of older churches as quintessential heritage assets. This is in line with the national framework for designating heritage assets, which means that these types of asset are relatively well protected by legislation.

Some recognition also of the heritage significance of areas of post-railway pre-New Town development in West Green, Southgate and Three Bridges. These seem to be seen as clearly distinct from the post-war New Town development. Parts of these areas are now designated as Conservation Areas with others (e.g. Goffs Park Road) being identified as Areas of Special Local Character.

Views on the value of Crawley's post-war New Town heritage are more mixed: these (even including 'airport buildings' seem to be acknowledged as having value, but of a type which has more 'niche' appeal. Some of these areas are now identified as Conservation Areas.

Crawley's open spaces and parks feature strongly in responses. Those referred to are identified in the Local Plan as Historic Parks and Gardens, as well as benefiting from other policy protections, in order to support the conservation and enhancement of their heritage significance.

There is reference again to elements of the 'intangible' heritage, such as communal memory and associations with notable residents. The acknowledgement of such values is a specific benefit of local heritage designation, which is an important facet in the Local Plan approach.

**WELLBEING & COMMUNITIES: OPEN SPACE, SPORT AND RECREATION**

**Which open spaces, sports or recreational facilities in Crawley are most important to you?**

Tilgate park, Loppets Road field, Tilgate playing fields, Hawth woods

Open spaces are my favourite. I enjoy walking through anywhere like the manicured gardens, or even the nearby trails like Worth Way. I've noticed that Crawter's Brook and Grattons have been improved in recent years and look forward to seeing it soon.

Tennis courts, the lakes at Tilgate Park and Buchan Park. I also love the facilities and wild areas in Willoughby Fields. Goffs Park is good for family days out (but a good independent café would be welcome). I always love the view of Goffs Park from the train and feel lucky it is part of my town. The skate park is also excellent. The tennis courts on West Green playing field are well used and should be better maintained.

Recreation grounds/Playing fields, parks,

Tilgate Park, Grattons field,

Children's parks and fields

Gainsborough Road Playing Field, Crawley Memorial Gardens, Ifield Mill Pond, Tilgate Park

All

Gyms as they offer many different classes i.e. Thai chi, yoga etc. Football pitches.

Maidenbower Pond

Maidenbower Park Crawley

Memorial Gardens

All of them, we need more.

No views

Tilgate Park, Buchan Park, Goffs Park. K2 is a joke so not worth the money on membership. Private clubs are better for most things in my opinion.

Tilgate Park - the parking on busy days is a farce as it the new p&d machines not taking card payments as it won't connect just ask parking services for level of complaints they get there... Tilgate needs parking restrictions to allow residents to park and not fight people going to the park or K2

Football ground, K2 and Crawley Wellbeing

Any sporting facilities that allow young people to express themselves and build their skills for the future  
Goffs Park

The Hawth Theatre in the Hawth grounds

Ifield Brook Meadows and the surrounding green space

Tilgate Park & Buchan Park

Ifield Village Conservation Area; the walk through the meadows from Ifield village to Ifield Water Mill and water gardens in Bewbush; the open countryside just outside the CBC boundary in HDC land that has a network of footpaths; permissive footpath along the side of the River Mole (again much on HDC land).

Further afield but within Crawley: Tilgate Park, Memorial Gardens, Goffs Park, Southgate Park.

Maidenbower Park on the other side of the town is less used by us.

K2

There are of course Clubs which are paid for by members' subscriptions e.g.: Crawley Lawn Tennis club (in Crawley); Ifield Golf Course (on Horsham land).

Outside the town: Buchan Park

Cycle routes, especially Worth Way, which are traffic free.

Tilgate Park, K2, the footpaths into the fields and woodland around Ifield. Love that it is possible to walk across fields to the

Parks, Gardens etc.

The spaces between buildings, Re Sun and Air Granulation(?).

Tilgate Lake, (Hardly open!), Parks, K2, Gyms, Cricket, Football.

Tilgate Park

The Greenway

Broadfield Park, Tilgate Park, K2, Badminton Courts, Football Pitches at Maidenbower

Hawth but would like tickets to be a bit cheaper.

Tilgate Park/Golf Course including lakes

Gainsborough & Furnace Green Playing fields, K2.

K2

Worth Park

Tilgate

Buchan

Memorial Gardens

K2 (but swimming pool often closed to local people) and Tilgate Park.

The park in the town, the playgrounds for the children.

Parks, tennis court, woods, garden, parks. Football pitches etc.

#### **Council Responses:**

A vast number of open spaces have been identified as important to respondents, as are indoor and outdoor sports facilities which host clubs and provide appropriate facilities for other types of sport. The council's Open Space, Playing Pitch and Indoor Recreation studies will provide evidence to support the policies in the Plan which protect these facilities.

Fields and wooded areas are important for residents who enjoy spending time outdoors and those mentioned are appreciated for providing residents and visitors with recreational places to visit. These areas and spaces between buildings are protected by policies in the Local Plan relating to the countryside, open space, green infrastructure, amenity spaces/structural landscaping as well as soft landscapes.

There are Community Centres across Crawley which can be used for a variety of activities, these are protected by the Local Plan's infrastructure policies.

Memorial Garden in the Town Centre is protected in the Plan as a recognised Park and Garden and is currently undergoing renovation works, including works to the Children's playground.

#### **Are there any recreational facilities you would like to see provided in Crawley between 2020 and 2035?**

Drainage on the Tilgate playing field, currently too waterlogged during winter months

A small recreation centre as a supplement to K2 would be great as an addition to any new development- especially is its offering large residential intake so far from Tilgate.

A lido would be wonderful. More tennis and basketball courts. A roller skating rink, additional skate park.

Would love some dog friendly cafes. Arts and crafts facilities, more cycle paths/footpaths

More outdoor gyms, more free outdoor areas (although Crawley do pretty well already) but like football goals and basketball hoops etc.

Memorial Gardens to be a safe space

Northgate park

Broadfield Park and Broadfield House

Something that gives children and teenagers something to do instead of bored into doing criminal activity and drugs.

??

Southgate playing field, a splash park on the premises would be fantastic, away from the skate park, also a new play park, maybe relocate that too.

Northgate playing fields.

The problems of parking at K2 - and perhaps more generally in leisure areas.

I'd like to see an ice rink in Crawley. Even if it's a temporary one in winter. That was brilliant fun and so nice to not have to travel all the way to Guildford.

The 'old kennel site' on the edge of Buchan Park, a large currently pointless area either build on it or close it down.

No

We need mountain bike facilities BIG TIME!

Immediately - restoration of toilet facilities, which were lost when the cricket pavilion was burned down, to provide a public toilet close to, and level with the play area. Also the Model Railway needs a working environment for volunteers which gives civilised facilities for both sexes and all ages who give us our much loved model railway. Nearing its 60th anniversary the engineers should be given much more support.

Yes - Ifield Brook Meadows was designated a Local Green Space [LGS] by CBC - not a Conservation Area. The area needs to be further protected by CBC upgrading the area from a Local Green Space [LGS] to Local Nature Reserve [LNR] by linking together (by building a footbridge) Ifield Brook Meadows with Ifield Mill and Millpond.

Even with the help of volunteers Tilgate Park seems to have insufficient staff to keep it at its best. Buchan Park would benefit from less dogs. Something needs to be done with Anniversary Park. Friends group?

Ice Skating • Trim trails (wooden step-overs etc., not the metal gym exercise machines seen now in public parks); • Youth centres

Nothing comes to mind.

More warmer Pools (swimming in Crawley too cold for little children) send mine to Horsham.

Another major sports centre (getting into K2 is like a "hard border" now...).

For kids/young people Roller Skate Park, Skate Skateboard Park

A snowdome with ice rink (indoor skiing / snowboarding)

Cheaper gyms

Free walks, rambling/walking clubs.

Youth clubs, youth activities.

Bowling Alley.

Dance Hall for the over 30s would be great. Bring back the 'BIG BANDS'.

Ice ring, bowls ground. Disabled sports areas.

#### **Council Responses:**

Several responders request a diverse range of activities for youth and kids and encourage better maintenance of the facilities that are already in place. Water leisure activities are encouraged to come forward. An advancement of specific sports that cater to groups e.g. disabled sports areas would likely have a positive effect on Crawley dependent on demand. The Local Plan can provide evidence through the current Open Space Study which is being reviewed on where there is a surplus and deficit in certain areas of open space, sport and recreation spaces and activities.

Information provided in these surveys will be shared with the other departments in the council.

### **WELLBEING & COMMUNITIES: INFRASTRUCTURE PROVISION**

#### **Are there any transport, utility, or community facilities missing or needing improvement in your neighbourhood/in Crawley?**

Lack of cycling provision along Ifield Avenue north-west of A23. Poor maintenance of cycle route along A23 (and cycle routes generally). Better crossing facility needed at junction of Ewhurst Road and Ifield Avenue. Pedestrian crossing at the top of Hawth Avenue near the Hawth theatre. Dual carriageway is very difficult to cross for pedestrians

I think more footbridges would be great in Crawley- especially across the A23 and railways. Not only do they provide convenience and accessibility, but offer great views of Crawley. I have wondered if a Park and Ride Service may be of service beyond 2035.

Public transport is good in Crawley and should be maintained. I think the buses etc. are good

Local recycling at shops?

A bus service which goes directly from Tilgate to Three Bridges Station. Commuting by train would then be a more attractive option than the car

Broadfield Recycling spots not really.

Greater provision should be made of fast-track buses and perhaps light rail between communities and the centre/Manor Royal and Gatwick

Buses do pretty well. Though a little expensive at times. Otherwise it's all fairly OK.

I know all of furnace green would object but the underpass by oriel school leading into furnace green should be changed to find a way to fit vehicles one way so when 3 bridges gets busy people can escape that traffic and alleviate the problems at 3 bridges

No, we have a good bus service and are close to the motorway4

Cycle lanes need to be smoother as current ones are full of bumps and holes, which make it not very comfortable and in many occasions better to just use the road

A train station to the south of the town hard to tell - we walk into town

Yes - we need more sustainable public transport to prevent the town being choked up by private cars.

More car parking is needed in Tilgate - in residential streets, at the Parade and at Tilgate Park. Would a circular bus route linking the neighbourhoods to each other be worth considering?

Community centre improvement (see earlier comment) • Enhanced investment in schools. • Dementia friendly cafes and related facilities. • Increased support for long-term carers. • Toilet block on the Ifield Village Green open. It is locked and only there for the use of the sports club during matches. Given that a lot of people come to the green for recreation, the toilet facility is much needed. • Buses that go direct to K2 and Tilgate Park.

Getting in and out of the county oak and surrounding area is awful.

Nothing comes to mind.

Trains, Water, Roads, Pot holes, Parks.

More landscaping and pedestrian areas in the Parade areas.

Better Broadband

Youth centres

Hospital, no community centre

Three Bridges Station

Ifield Station – especially if the Ifield West development proceeds.

No youth clubs for socialising.

Chichester Close playground needs updating.

Daily bus service to Tilgate Park, not just weekends.

We have a smashing transport systems. Could do with a bus on North Road, Three Bridges.

Disabled access to more room on buses.

Ensuring building can adapted to accommodate disable people. Build awareness for workforce.

Signs for disabled people. More slopes for paths for wheelchairs. Sensory area for those individuals who has autistic spectrum.

Street clour's which shows images of flat or steep slopes. [www.theguardian.com](http://www.theguardian.com) 14 Feb 2018.

#### **Council Responses:**

The Infrastructure Plan sets out the Local Planning Authority's current understanding of the position in respect of the various forms of Infrastructure provision. The plan as a whole will provide a basis to ensure that development is supported by the necessary infrastructure, including (where appropriate) requiring developers to provide infrastructure or provide financial contributions towards it.

In respect of health facilities: the Local Plan can identify the infrastructure needs associated with the existing population and needs emerging from new development. However, the NHS will advise on their strategy for meeting health needs including the how, and where, the hospital services for the borough will be met.

Local Plan Policy ST1 makes provision for better fulfilment of potential to link development with improvements in cycling/walking/public transport access and infrastructure. This is intended to operate alongside the council's emerging Transport Strategy and Local Cycling and Walking Infrastructure Plan. Developer contributions (S106 and or CIL) will be available to support improvements to these networks. Local Plan Policy ST4 safeguards land for a potential link road between the A23 and A264 (within Horsham District) to relieve existing congestion and respond to anticipated growth at Gatwick Airport and to the west of Crawley. Transport Assessment will be updated to take account of currently proposed levels of development. As set out in the Infrastructure Plan, mitigation at key junctions elsewhere is anticipated to relieve parts of the network which would otherwise be pushed over capacity by development projected over the Local Plan period.

The Open Space Review will assess levels of provision of play space/sports facilities across the boroughs. Developer contributions will be sought towards improved facilities and new facilities/upgrades in capacity of existing facilities will be sought to address anticipated losses (see Housing and Open Space sites in Policy H2).

Local Plan Policy IN3 seeks appropriate cabling to ensure that new developments are connected to high quality communications infrastructure.

- Improvements (including access improvements) to Crawley, Three Bridges and Gatwick Airport stations are programmed for the early part of the Local Plan period. Local Plan Policy ST3 provides a framework whereby developments close to stations will be expected to reinforce their functions.
- Local Plan Policy H3g sets out the council's position in respect of potential urban extensions to Crawley, including expectations as to how they will contribute to addressing the additional infrastructure demands (within Crawley and elsewhere) which they will generate.
- Issues related to the accessibility of buildings are addressed in Local Plan policies DD1, DD2 and DD3. Policy SD2 together with Policies CL2, CL3, CL4 and CL5 make provision in respect of legibility of layout, materials and design.

### **What should be the key infrastructure priorities for supporting the growth which is planned in Crawley for the period 2020-2035?**

Enabling more people to walk and cycle to school and work by providing infrastructure that is usable by people of all ages. Discouraging car use.

Encouragement of small businesses in communities  
Densification and multi-modal transport should be central.

Improving road and transport links whilst maintaining green spaces. Encroachment of development in Rusper Road onto woodland causes me concern. More development of brown field sites and less green field site development

More economic transport

Keeping traffic flowing - adequate parking provision - bus passes for over 60s residents Broadfield  
Crawley hospital

Good upkeep of roads Better bus services.

M23 access on both sides and both directions at Maidenbower.

A post office in the Northgate area, the nearest one is now in the County Mall, which isn't that close to a lot of the people who live in Northgate. More consideration for road crossings.

Recognition that transport is important and that many will still prefer to use cars unless and until decent fast public transport can be demonstrably improved. The A264/A23 could readily be widened into three lanes to speed up business traffic movements and consideration given to removing traffic lights equally to speed up traffic as per the successful Belgian experiment now being trialled elsewhere in the UK.

New hospital. Fully equipped... With A & E and maternity wards.

Road improvements. Some of our roads just get gridlocked in rush hour. Tushmore roundabout... Maybe part time signals. Cheals could do with decent improvement from all directions. The roundabout by the old ambulance station is diabolical and dangerous. Parking for many neighbourhood areas. Maybe cutting down some of the grass verges to make room for more cars. Some of the verges are incredibly wide so we could still have some grass verge. All these things are important to people.

Langley Green drive is simply dangerous no one has driveways it's a bus route and very dangerous as no yellow lines on it, put yellows all over it so people and buses can drive safely down it.

The roads.

A ring road to the West which should be a proper by pass, not divide off a third of the town sustainable public transport and more infrastructure improvements such as schools and GP surgeries but not more roads or housing on green space

More surface-level car parking both in town centre, at Manor Royal and the older neighbourhoods.

Discouraging residents from opening the whole width of their properties to the street, often taking two public car parks. Clawing back public car parks where this has happened already.

Medical services • It would be amazing to see provision of 24-hour medical appointments and or pharmacy provision to suit employers and employees within the Gatwick/Manor Royal area who are busy full time shift workers. • Educational provision • Enlarged sewage works • Secure water supply • Adequate local shopping facilities on the parades to support the growing population. • Hospital with A & E and a wider range of consultants

Try to stop people going everywhere in their cars

You cannot have growth forever; there is too much already.

Crawley Train Station (more lines) – miss the level crossing somehow.

Economic development?

Attracting skilled workers?

Maintaining services e.g. street cleaning.

Better Wireless

Better roads and pot holes repaired better.

Crawley Station  
 Three Bridges Station  
 Cycle routes.  
 Electric car charges  
 Improved train trips – cheaper and more value for money.  
 More police presence on the beat would make the elderly feel safer, and the young people would get to know their local Bobby as a friend and not the “enemy”.  
 New hospital. University.

**Council Responses:**

Responses to this question are similar to those made in response to the question ‘Are there any transport, utility, or community facilities missing or needing improvement in your neighbourhood/in Crawley?’. The council response to that question is therefore to a large extent equally valid here. Additionally:  
 The Planning Obligations Annex sets out how financial contributions from new residential development will be sought towards Education facilities. The location and establishment of Universities is an issue of national policy and legislation and there are no current plans for a new University in the area.  
 Electric vehicle charging points are a requirement under Policy ST2 (Parking Standards) and the Parking Standards Annex.  
 Some responses raise issues which are responded to in more detail under other questions, including those relating to economic growth and skills and the Town Centre.

**ECONOMIC GROWTH & SOCIAL MOBILITY: ECONOMIC GROWTH**

**Given the limited amount of land remaining in Crawley, how best can new employment floorspace be developed in the borough?**

Focus on why our schools are not turning out kids with better qualifications?? Expand manor royal, plenty of space on Gatwick Manor House and Gatwick farm.

By utilising unoccupied buildings, office space and allowing changes to usage on buildings.

In the context of where industrial or commercial floorspace is needed, it would seem that Manor Royal is coping adequately. There is a trend towards more home/remote working so unclear if additional employment floorspace is needed.

I see no reason why manor royal building can't all be 5-8 floors no one lives there to object or be affected by it but driving round it most buildings are 3-4 floors high.. build it up

through the sensible and sensitive use of existing infrastructure and brown field sites

Small workshops and specialist manufacturers probably support more employment per square meter than do some of the mega-businesses at Manor Royal. Nevertheless the large businesses are capital intensive and may reap large rewards. Ensure a range of commercial building types and sizes?

Don't overlook Lowfield Heath or the area behind County Oak.

Can there be shared space opportunities for hot desking office rental situations/meeting room hire provided by the council in buildings that have empty floors?

Please see attached letter dated 16 September 2019 from Tim North & Associates Ltd and Williams Gallagher for comments aligned to economic growth

None, the future emphasis must be on the ‘North’ of the UK.

Tech companies bring them in (more people can work from home etc.)

Give tax breaks

Reduce rents too High!

? Another Manor Royal?

Create small business units for new businesses. Crawley Station has an empty building above that could be used for many activities.

Mixed Commercial/Residential Development

The old Telephone Exchange could be used.

The old Police Station.

The old Library.

Build up and use existing old buildings with modifications.

**Council Responses:**

The NPPF requires the council to plan positively for Crawley’s economic growth and the Local Plan seeks to support business and creative industries, although the planning system can’t control rents or business rates/tax.

The intensification of sites within Manor Royal for employment purposes is encouraged in the Plan, and mixed use, high density schemes are promoted in the Town Centre. Temporary and creative uses are also encouraged.



The Employment Growth Assessment has identified potential need for significant employment growth in an unconstrained scenario, and therefore the Plan designates the area previously safeguarded for the preparation of a North Crawley Area Action Plan which will assess the need for employment floorspace alongside that of the airport growth.

The Telephone Exchange and Police Station have not been promoted for development and are not known to be currently available. The Old Library (County Buildings) is an allocated site for mixed use development.

**Do you feel all our employment areas should be protected from redevelopment, or which do you feel are the most important?**

I'm glad that the Town Centre has embraced mixed-use development. However, I think the recent change from office to residential has a limit. I hope the Town Centre does not lose much more retail/office to residential over the next few years.

I think the Three Bridges corridor will be much improved with more development: I consider it a higher priority.

Some office space is good for residential use if the location is suitable Less housing, more business.

No. Mixed use combining residential and commercial should be encouraged

sort of I would build where you could but mainly build up like every town has to do all should be protected I see little advantage to Crawley (other than meeting UK Government imperatives) in replacing business properties with residential.

Yes

You need a mix of both.

They must be able to evolve and develop as needed in the future, thus some sort of efficiency can be obtained.

Business/tech firms

But only if our children are safe.

No

Areas around Broadfield should be left. You do need better air to breath.

We should not be mixing residential with Industrial estates.

Don't know.

Builds that are fit for purpose to used, the rest get rid of.

**Council Responses:**

The council recognises that some employment floorspace is outdated and Local Plan policies are supportive of redevelopment and intensification. However, it has introduced Article 4s to restrict the conversion of commercial buildings to residential uses in Manor Royal, and will be introducing more in other Main Employment Areas where residential use is not considered appropriate.

**Are there any types of employment floorspace missing in Crawley, or that we need more of?**

Don't know

Technology employment for Crawley

More manufacturing space, we lack in this hugely

I am unconvinced there is floorspace missing.

There may, however, be a quality issue which should give rise to redevelopment of existing space unknown

small to medium business enterprises

Manor Royal could use a mini-town centre where services are available to local businesses e.g. lunch-shops, office supplies, meeting facilities etc.

No consideration has been given to the employment generation derived from long term off-airport car parking proposals which can be equal to or greater than a number of employment generating uses.

Nothing comes to mind.

Tech ecosystems.

Pass

Create small business units for new businesses.

Crawley Station has an empty building above that could be used for many activities.

Small units that can be used by individuals to see services on goods. Like Snoopers Paradise in Brighton.

Empty shops could be used for teaching people to cook – sew and many other skills which will help people to feel better about themselves.

**Council Responses:**

The Local Plan is positive about business and creative industries, and in supporting the provision of high quality communications infrastructure. It seeks to be flexible in the town centre to allow a range of main town centre uses, whilst retaining a retail heart.

A Hub facility to provide facilities to support businesses and people working in Manor Royal is supported in policy.

**How do you think the employment skills gap should be addressed?**

Developing actual affordable housing everywhere-both private and social. This may retain some of the skilled workforce who have grown up or trained in Crawley.  
Schools  
Training facilities.  
By encouraging manufacturers to come to Crawley and Gatwick with low rates and assistance to young trainees via college etc.  
Offering opportunities for apprentice schemes supported via the college, later life education provisions more widely advertised and made available.  
More positive encouragement and support in educational facilities and including apprenticeships - with financial and practical support to employers  
There will always be a difference its bot a big issue - there are bigger problems to solve  
The neglect of Further Education nationally is a great loss, since 1993. More support, easier access which probably means not using any more of the Crawley College site for building to allow some parking.  
by Crawley not being too dependent on Gatwick Airport as its prime employer  
I think this will partially cure itself in time. People have come to Crawley because there is work here and housing is relatively affordable. The second generation will hopefully be better educated and able to move up the pay/skills ladder. It's not surprising that those who commute to Crawley do so because they have secured well paid employment - otherwise they'd work where they live.  
Can the employment skills gaps be met by Crawley secondary schools and key businesses running summer schools for students in preparation for apprenticeships schemes?  
No comment  
More scientists, engineers, technicians etc. and less of the superficial(?) shallow rubbish.  
Improve schools and college funding.  
Bring in more from University of Sussex/Surrey if possible.  
Auditing what's available in the first place. Joint consultations with relevant agencies – what are the gaps?  
Training  
CBC should employ staff already trained in professions  
Invest in the children to give them aspiration and a “can do” attitude. Provide parents with better skills to inspire their children. Target the neighbourhoods that lack aspiration.  
Many pensioners work to top up their pensions so young people don't get a look in.  
More apprenticeships and encouragement for disabled people to return back into employment.

**Council Responses:**

Local Plan Policy EC6 is proposed to secure skills support and funding towards training from new developments alongside other non-planning interventions, such as Employ Crawley and work with local education providers. The policy will create opportunities along the supply chain. Job opportunities will be provided for those qualified, education/training opportunities for those not qualified.

**Do you think the evening and night-time economy should be supported? If so, how?**

Yes, but I have no clue as to do this.  
I do not feel safe in the town centre after about 6pm so would not see it as an evening destination. I think safety and security are pretty important to establish before people consider any area as a suitable evening destination.  
Yes. More restaurants. Mostly the present range are all take a ways.  
Yes, restaurants and pubs need support, if they offer a place that results decent customer behaviour, then they need bonus cuts to rates.  
If there are more residential opportunities within the town centre combined by better transport facilities, this should be self-generating and with lower rents, more facilities will be encouraged.  
Not really, the cinema complex is nice but I don't see any need to help the bars etc. on High Street  
Yes - maintaining public transport and community policing  
yes - by better public transport  
It's a pity that entertainment precinct and the Hawth are remote from town centre and the High Street is dominated by down-market takeaways. There is a lack of town centre meeting venues for clubs and societies. Free town centre car parking at night would be helpful.  
See our note about 24 hour medical services.  
Yes, through the proposed policies set out in the emerging Local Plan  
If they cannot work in the economic climate, they deserve to die. No council support should be used for private enterprise of any kind.  
NO! Not for Alcohol Antisocial Behaviour.  
Other business okay! Reduce prices.  
Yes – ease parking restrictions/costs in town centre after 7pm.

YES, opportunities for new “music ventures, ideas etc.”  
 Ask us?  
 Yes, more night markets  
 Yes.  
 Improve crime rates.  
 Make people feel safer.  
 Make the old High Street a nicer place to spend time in.  
 Encourage restaurants to open in Queens Square.  
 Don't know what you mean.  
 Yes. Yes. NO gambling. Late coffee places and places for disabled people to meet.

**Council Responses:**

The “Night time economy” relates to a range of commercial enterprises and not just pubs/bars. It includes restaurants and cafes, leisure and other activities. The Local Plan includes Policy EC7 which supports development supporting the vitality and viability of the evening and night-time economy providing it doesn't adversely affect the amenity of the area. Temporary and creative uses are also encouraged. Increased night-time economy uses can help improve safety through increasing footfall and natural surveillance which is encouraged in design policies. Gambling is not necessarily a night-time activity and much is outside planning cannot control.

**ECONOMIC GROWTH & SOCIAL MOBILITY: GATWICK AIRPORT**

**What key issues do you think should be considered to ensure any growth at Gatwick Airport is sustainable?**

Traffic - plane noise - access for workers - parking for those using Gatwick Transport access and parking.  
 2nd runway needs to be built  
 the transport infrastructure supporting the airport must be a major priority  
 pressure airlines to improve air quality of planes quicker to minimise damage of the 2nd runway  
 Pollution monitoring  
 the current uncontrolled back door growth by Gatwick must stop and CBC needs to better monitor and comment on this  
 Sufficient road and rail access. Will there be enough short and long term car parking? Maybe the viability of re-laying the Three Bridges to East Grinstead railway should be considered?  
 It must be compatible with climate change targets • It must be linked to improvement of public transport access • Noise impact on the town and surrounding countryside, villages and towns must be reduced • Pollution from fuel and exhaust of aircraft must be reduced • It should not damage areas of outstanding natural beauty. • It must be consistent with the concept of Crawley as a town in the countryside. We believe that any growth should only take place if matched by: • policies to reduce (not 'mitigate') noise and pollution, and to • an increase in the proportion of passengers and staff travelling by public transport; and if it policies consistent with national climate change targets.  
 Please see attached letter dated 16 September 2019 from Tim North & Associates Ltd and Williams Gallagher for comments aligned to Gatwick Airport  
 Transport links to and from the Airport.  
 Second Runway!  
 Good (and enough) services in the locality; health care, schools, housing, road (not forgetting parking!)  
 You are already expanding the M25 Motorway that should help  
 2<sup>nd</sup> Runway  
 Better infrastructure – improved roads to access Gatwick. Bypass Crawley. Improve rail, cycle and bus access.  
 Sorry I don't know anything about Gatwick.  
 Accommodation. Wildlife and nature. Noise. Access of roads signs.

**Council Responses:**

Policy GAT1 of the Local Plan supports the growth of the airport with a single runway, subject to minimising and if necessary mitigating its environmental impact, securing infrastructure and maximising benefits for the local area. There is also a legal agreement securing environmental mitigation, including air quality monitoring.  
 Noise policies in the Plan also prevent noise sensitive development in areas affected by aircraft noise.  
 The Local Plan has introduced an Area Action Plan policy in place of the previous safeguarding, providing the opportunity for the potential future growth of the airport to be considered alongside other development and infrastructure needs.

**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?**

<p>No. On airport only. On airport. Airport only, Gatwick has excellent train links for those further afield there no reason to park your car in Crawley to go on holiday. those cars should be towed instantly The constraint on land should prevent parking other than on the airport. Parking should be within the airport boundary. Already several fields around the area are taken up with parking, giving yet another encroachment on the countryside. One of the major problems that we have in the town, and especially in Ifield, is rogue parking in local streets for Gatwick. No, see attached letter dated 16 September 2019 from Tim North &amp; Associates Ltd and Williams Gallagher for comments aligned to airport related car parking Airport parking MUST NOT move into Crawley Town or take over any green space in Crawley. Keep as much on Gatwick site. On airport, as off airport could infringe on public environmental issues.</p>	<p><b>Where?</b> Outside/Green Farm areas Charlwood etc. Off site and shuttled in, space in Horley and Charlwood APH have relocated to the edge of the motorway which seems to be working well. I recognise the need for parking, but I think between all local authorities should allocate space for a fair portion of relief off-site parking, while LGW also commits to more on-site parking provision. Airport parking is ok as it is. Currently it is both on site and off site On and off site Both Both - but off airport should be on brown field sites Wherever but I'm not aware of suitable off-airport locations.</p>	<p>Not sure Don't know. Not sure? ?</p>
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**Council Responses:**  
The council considers sites within the airport are the most sustainable locations for airport parking as they are closest to the terminals and the Local Plan therefore includes a policy to prevent off-airport parking. The airport operator is also bound by modal shift targets to increase public transport access to the airport through the Legal Agreement with the council and its Surface Access Strategy. The level of car parking is an important element of this Strategy. Whilst existing authorised off-airport parking, such as mentioned in comments, is recognised as part of the airport-related parking supply, any further off-airport spaces would be less sustainable and could have a negative impact on the countryside and the availability of land for other uses within Crawley.

**Should land south of Gatwick Airport continue to be safeguarded for a potential future wide-spaced additional runway?**

<p>Yes. I don't believe that there is enough demand for expansions for the next few decades Yes, as growth of Gatwick will only benefit the town's economy. Whether this will ultimately require a full-scale southern runway is not something that can be determined in the foreseeable future. Absolutely do it, the runway should be inevitable. Probably. Yes Yes if they build it. Yes. Yes Yes Yes.</p>	<p>No - this is unacceptable given that Gatwick Airport has confirmed that it has no plans to pursue a third runway. The land concerned is much needed for other uses. Land south of the airport should be developed for commercial purposes. No. We think that it is time for the land not to be safeguarded to remove the possibility of the third runway at Gatwick. No, Please see attached letter dated 16 September 2019 from Tim North &amp; Associates Ltd and Williams Gallagher for comments aligned to safeguarded area No more expansion; airports in the North of the UK are better placed to develop than Gatwick. No – unless air quality can be improved. If it could be used for residential/light industrial use a choice needs to be made about which Crawley needs most Could be used as temporary long term parking.</p>	<p>Don't know. No, it is a shame, but this runway needs to happen This is likely to be a Government issue principally - especially given the uncertainty over Heathrow Third Runway. Inevitably there is a need for continued growth in air travel which has to be met.</p>
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**Council Responses:**  
The council recognises that this is a complex issue, which raises mixed views. However, the large area of historically safeguarded land has posed significant challenges for Crawley in meeting its development needs. The council has therefore taken a pragmatic approach by designating an Area Action Plan policy in

place of the previous safeguarding. This will allow the principle of future safeguarding to be considered, and provides the opportunity for the potential future growth of the airport to be considered alongside other development and infrastructure needs.

**Should the airport boundary be changed to the boundary shown in the Airport Master Plan?**

Yes	No	N/A
Yes	No	Don't know.
Yes.	No. Although the increase in land is small (as shown on Plan 21 in the Master Plan), it allows Gatwick to be poised ready for a third runway at some future date.	Don't know
If the requirement can be justified by a business case, then this makes sense.		
Yes	No, there is no justification, and GAL should be required to show demonstrable need before doing so.	
Yes.		
Yes	No change.	
Yes		
Yes		

**Council Responses:**

The council has accepted some of the changes proposed to the Local Plan Airport policy boundary in the Gatwick Airport Masterplan. However, it does not agree with all the changes that the Master Plan proposes. The Master Plan boundary reflects land the airport operator owns or manages, and extending the Local Plan Airport policy Boundary would bring areas currently in the countryside into the airport. This would give areas that are currently protected a more lenient policy position for uses, including airport parking, which support the growth of the airport.

**ECONOMIC GROWTH & SOCIAL MOBILITY: CRAWLEY TOWN CENTRE**

**What makes you want to visit and spend time and money in Crawley town centre?**

Ease of access from Furnace Green  
 The accessibility on foot and by bus has been excellent for Town Centre.  
 I don't 'want' to go. I only visit because I 'have' to use banking, pick up a parcel or to visit a particular shop... it's not a desirable place to visit, grubby and tatty with rough sleepers, drunks, smells of weed in the Memorial Gardens etc.  
 Cheap shops like Primark as you can't shop online  
 Shopping mall  
 The convenience of parking, but I'd like to see more security and less antisocial behaviour  
 At present, not much encourages me to come to Crawley.  
 County Mall, cinema and coffee shops  
 Proximity - my local shops are Town Centre  
 Nothing apart from the fact that it is my local shopping area - it is dingy and down at heel  
 Range of shops, coffee shops, library, museum.  
 A fair range of clothes shops, including Marks and Spencer's, Decathlon, and Debenhams as well as shops that appeal to younger people. • Mobile phone shops • Book shop and stationery shops • Opticians, hairdressers etc • Library and Museum • Cafes • An improved Queens Square with the fountains and coffee shops Although County Oak is not considered Town Centre, it is close-by and provides facilities not available in Town Centre.  
 No comment  
 Only go there if I need something.  
 I go there because there is a wide variety of shops. I do not like County Mall because the layout is bad. County Mall car park also not good because of how it brings you into the shopping centre. I also go to town to visit the library. I like to walk to town to save hassle of parking car. Sometimes go to a restaurant in the evening or a pub in the afternoon.  
 [unreadable word] purposes only – nothing else.  
 Haircut etc. Treasure Chest etc.  
 Hate town – fights etc. not safe for children.  
 I like the new fountains etc.  
 Variety of shops  
 Places to eat/meet  
 Pedestrian areas  
 Library (✓✓✓)  
 The "Multi-ethnic" make-up of Crawley is inviting I like that.  
 Nearness only (unreadable handwriting)  
 Bank and some shopping.

Good shops (restaurants, would like to see more independent retail spaces for small businesses, art / craft type stalls indoors

Not much. Lack of decent shops if Morrison's closes perhaps an ALDI etc.

Historically the town centre has a good range of shops, although in recent years this has declined.

Access is good. Plenty of parking.

Good rail and bus service.

Library, Waterstones, Debenhams, Wilko, Memorial Gardens, Playground.

I live in Three Bridges so I have everything I need, Tesco, Lidl, Iceland, various corner shops, post office, doctors, church, pubs, station. The only reason I need to go into town is to check my Bank Balance and payments that have gone out.

Coffee shop, vegan shops.

The variety of shops and the access for disabled people.

**Council Responses:**

The council notes the reasons respondents want to visit the town centre, as well reasons why they do not. The Local Plan seeks to plan flexibly for a range of uses in the town centre, including retail, employment, leisure and culture, in order to enhance the vitality and viability of the town centre. Economic growth policies, such as those supporting the evening and visitor economies, creative industries and flexible art and creative uses also support uses which will encourage people to visit the town centre. Survey responses have been shared with consultants preparing the Council's Retail, Commercial Leisure and Town Centre Neighbourhood Needs Assessment which will support the Local Plan.

**Is there anything else you would like to see in the town centre?**

John Lewis, a bigger M&S.

Less homelessness

John Lewis Waitrose

Private Crawley town security guards.

It needs to upgrade the quality of the offerings and make access for parking etc. less expensive less betting shops a big shop take over the closing Morrisons.. IKEA type shop

Not much, I'm pleased that the Museum has relocated.

A reduction in rents to make it possible for empty shops attractive to new businesses. a wider range of non-chain shops

Surface car-parking. A quality coffee shop opening on to Memorial Park. A stationary shop. Pedestrian underpasses on Brighton and Horsham Roads. Re-open the Ifield Road toilets.

Redesign of the area between the station and the Mall. It is not very attractive. • Debenhams retained (they have been closed in some other towns) • Better quality shoe shops • More individual shops (most are chains) • Repair and up-cycling workshop to encourage people to re-use rather than throw away and buy new.

No comment

I like the revamp of the square but it is very bare.

Less alcohol.

Less betting shops.

Less vagrants.

Treasure Chest.

More family activities.

More trees... more green

"Not sure"

More shops.

Not coffee shops.

More flower's colour.

Decent shops

More restaurants in Queens Square to make it a more social place.

Encourage more cycle routes.

The train station badly needs redevelopment. No lift for e.g. I use it often and feel the town is like the poor relation, compared to Three Bridges which was refurbished several years ago.

Centralised shops and sports facilities, so that all can access them by public transport.

More independent shops, to give variety and interest (like Horsham).

Shops like Rymans, Mountain Warehouse, John Lewis (as in Horsham)

I would like to see an old fashioned tea shop, proper chip shop.

Pop up stands for NHS help facilities and advice. More seats for disabled people. Spitting signs. Bus for \*unreadable word\* and dog waste bins. Signs for disabled people, blind, hard of hearing; art and craft events and farmers market.

**Council Responses:**

The council notes the facilities that respondents would like to see in the Town Centre. Whilst some of these fall outside the scope of the planning system, including the types of shops in the Town Centre, the flexible, supportive Town Centre policies should encourage new uses into the town centre. Other policies in the Local Plan relating to Town Centre development, active frontages, good design to reduce opportunities for crime and fear of crime, increasing sustainable transport and links to the council's emerging Cycling and Walking Plan, will help address some of these issues as they apply to new development proposals. The Crawley Growth Programme and Town Centre Regeneration Programme are improving the public realm, including a major project at Crawley Station. Survey responses have been shared with consultants preparing the Council's Retail, Commercial Leisure and Town Centre Neighbourhood Needs Assessment which will support the Local Plan. Outside of the planning system, the newly identified Town Centre Business Improvement District will identify a number of priority actions and initiatives to support 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?**

I think a small health facility (GP, dental) for Town Centre residents should be looked at.

Supermarket that opens for longer hours.

Improvements to Memorial Gardens as this will be the major open outdoor space for many families.

More things for children to do and get involved in

Schools

GP surgeries

Nothing, they have everything.

Adequate school provisions, GP provisions, outdoor areas (parks and play areas) all need to be considered carefully to ensure these are in place at the same time as the increased housing.

Better quality offerings

Every area needs decent GP's I believe three bridges was one of the worst in the country this year!! It's disgusting how long it takes to get a GP appointment: prioritise this when giving new planning permissions.

I think the High St has become a wining and dining centre.

At least one supermarket stays open 24 hours.

There is only one GP surgery in the town centre, Saxonbrook Medical which is situated above the Taj grocery store. Facilities there need improving, although there is an accessible lift parking restrictions make it impossible for people with poor mobility to be dropped immediately outside the surgery, I'm registered there and already it's virtually impossible to make an appointment less than three weeks ahead. Where will the occupants of the proposed 3,000 dwellings go for their routine GP care? I think provision should be made either for an entirely new surgery, or upgrading of Saxonbrook so that it is equal to the modern surgery at Southgate.

Better public transport Car parking.

Easy access to late night (or all night?) shopping for food, similar to a Tesco Extra. • Places to store bicycles (assuming there will not be car parking) • Eating places • The equivalent of a hardware store which holds everything from buckets, to the odd screw needed for DIY. • Community focus so that it does not become a place of many individual lonely people.

No comment

For residents there needs to be somewhere they can be outside to relax without any pressure. Could there be a community garden project in the high street instead of all that paving?

Nothing comes to mind.

More parks.

Doctors, dentist, school.

We need another college.

Same as all the others.

More parking but low cost

I don't like this idea.

Schools

Doctors

Affordable Housing

GP Surgery, upgrade hospital

Cheaper cinema.

More GP

Hospital provisions.

Don't know.

Use flats and accommodation above shops for housing. Allotments to encourage community involvement.

**Council Responses:**

The council notes the facilities that respondents feel are needed in the Town Centre to support its growing residential population. The Infrastructure Plan sets out the Local Planning Authority's current understanding of the position in respect of the various forms of Infrastructure provision, including health and education. The Plan as a whole will provide a basis to ensure that development, including in the town centre, is supported by the necessary infrastructure, including (where appropriate) requiring developers to provide infrastructure or provide financial contributions towards it. Local Plan Policy TC2 seeks to specifically support neighbourhood facilities to meet the needs of the town centre's residential population. In respect of health facilities: the Local Plan can identify the infrastructure needs associated with the existing population and needs emerging from new development. However, the NHS will advise on their strategy for meeting health needs. The council will continue to liaise with the NHS. Survey responses have been shared with consultants preparing the Council's Retail, Commercial Leisure and Town Centre Neighbourhood Needs Assessment which will support the Local Plan.

**HOUSING DELIVERY: HOUSING****What types of housing and accommodation would you like to see more of in Crawley?**

I think apartments are the way to go as a priority. I think family homes could be built around communal areas rather than having large gardens. I know it's not within the Borough boundaries, but Kilnwood Vale exemplifies a lot of what I do NOT want to see in Crawley.

I think garage blocks need to be redeveloped into housing. Garage blocks are under used and are ugly and encourage anti-social behaviour. We need more 1 and 2 bedroom properties due to different household dynamics

Affordable housing for young families. Places with a garden that is secure. Somewhere that is home. Actual affordable housing (not £300,000 houses as that's not affordable) using some of the old disused areas first - so rather than getting rid of green space there's some horrible areas that could be upgraded/rebuilt first!

It would be nice if the council demolished the 1950s housing and replaced them with 1 or 2 bed houses for the older generation who now require smaller accommodation as their families have grown up.

Very cheap and budget friendly homes for all those who are on a very low income benefits and to create 1 massive homeless shelter so that the homeless has somewhere to stay and off the streets.

Houses

All

Not more built houses but so many houses and flats are vacant.

More flats and also more 4 bedroom houses.

Social and truly affordable housing

More social housing.

Elderly in the form of an aging development

3 bedrooms flats and houses, terraced to make it more affordable.

more 3 bed houses

Medium to long term bedsits for homeless people and people with substance misuse issues. Purpose built bedsits for young people. A lot of professional 30 year olds I know still live with their parents because they can't afford to rent a flat.

More houses with sizable gardens for smaller families.

Family 3 to 5 bedrooms.

An increase in houses or maisonettes, with some outdoor space included. To allow people the ability to remain in the properties for longer than a few years before they wish to move on. Smaller properties and part of low cost housing to support sole occupiers with somewhere to live. Studios and 1 bedroom properties. Family homes, at low cost to help the population of Crawley purchase a house suitable for their needs.

More flats, smaller areas of land used but with more on, London have flats with 2/3 bedrooms and communal areas. We should have more of this type of housing, instead of miles upon miles of houses let's build up and not out. It's so sad to see so many areas destroyed by new building.

There needs to be recognition that family shapes have changed so that there are more singles and couples without children. More of the younger population see no need for garden space and many do not drive - so long as there are good public transport facilities. Hence there is a need for 2/3 bedroom apartments

Not social, especially the ones being filled with the London gangsters. Who have now brought knife crime, mugging and attitude into Crawley

More affordable. Private rentals are 1200+ per month for a 3 bed. Yet a council house 3 bed is 600-ish.



social housing of all sizes never allow them to buy it for god sake but cheaper rents for people working in emergency services in town as well doctors nurses police officers etc. if working in Crawley should get reduced rents

More affordable houses with gardens for the people of Crawley and not as many flats More affordable housing and fewer 4-bed detached More flats for single people

All types

I'd like to see an old office building being used as Crawley open house. A place where the homeless (living on the streets only!) can have beds/small rooms To stay, hot meals, an on-site doctor, an on- side support worker, showers, somewhere to do their washing and an office/information centre where there's computers and services they need where they can turn their lives around by finding jobs or going back to education.

Once they are stable on their feed and ready to move on Crawley Borough Council will support with bidding and finding a permanent place to call home.

No comment

Houses with garden

Affordable houses.

None

Firstly we need affordable homes for key workers in key roles like ambulance staff firefighters police staff civil servants of working job centres or any love or local authority once they're in place we don't need social housing for those at both ends of the skills priority given to those that are Street homeless Priority shouldn't be based on if you're single or not

Affordable housing

More variety in sizes and styles.

2 bedroom flats

Affordable houses and more council houses. • Single household apartments – most of the current stock are of 2/3/4 bedroom houses.

Housing is considered in the context of unmet needs in the letter dated 16 September 2019 from Tim North & Associates Ltd and Williams Gallagher

Housing with parking and parking for visitors. Accessible housing where you can park your car outside your house and have a nice garden.

Nothing, Crawley is already overpopulated.

More detached.

Single Person

Older Person

Fairer cost to allow people in Move in and afford to live there

Houses especially for people who can't afford to buy.

Affordable

Affordable for young, more sheltered schemes and care homes for elderly

Houses that the younger generation can afford. 1, 2, 3 bedroom houses with a garden, freehold.

Too many flats.

Consider (ground floor accommodation) for those living past 90 years.

Maisonettes

Three storey flats.

Bungalows.

Shelters for the homeless.

Share accommodation 2 bed and garden for dementia and carers.

More flats.

**Council Responses:**

Some responders are not favourable towards further housing development (or particular types of housing) but overall there are responses supporting additional housing provision of all sizes and different typologies ranging from studio flats to 4-bedroom houses. This is consistent with the approach in Policy H4, which is informed by the updated SHMA.

Many responses support additional provision of affordable housing, including social/affordable rent, affordable home ownership products. On the basis of evidence for affordable need detailed in the SHMA Policy H5 seeks 40% affordable housing with a 75%/25% split between social/affordable rent and affordable home ownership tenures.

Responses support provision of a range of tenures and types of accommodation catering to other groups with specific needs, including older people (downsizers as well as those requiring care), young people (e.g. in the form of smaller rented properties with communal space), key workers, and homeless people (e.g. temporary accommodation). Local Plan Policy H2 (Key Housing Sites) includes allocation for housing for older people, and Policy H6 sets a framework for treatment of applications for Build-to-Rent housing,

including private market and affordable elements, which is likely to provide greater rental security and should be suitable for younger households.

Various types of location are identified as being suitable to provide additional housing, including converted commercial premises, garage blocks, existing housing. The sites identified in the Housing Trajectory include a number of sites of these kinds, and the typologies set out in the Housing chapter of the plan set a framework for treatment of proposals of these (and other) specific types.

**Which groups in particular are poorly catered for by the available housing supply in Crawley?**

Young people trying to get in to market renting. However, I think the worst thing is services and shelter for those with no permanent accommodation.

We need more social housing for those on low wages. Private rents are unaffordable. There are too many elderly people under occupying social housing

Families that are deemed too well off for council help. Like my son. He and his girlfriend have a young baby and her son from a previous relationship but because she works they are in private accommodation that they can barely afford.

People on a low income!!! That are stuck renting or can't afford to move

The retired age group of the population. Mixing retired and younger aged residents in flats does not work especially with the attitude of youngsters nowadays who say they will do what they like when they like and do not have consideration and respect for others who live within the same building.

To all adults who are in supported living services across the UK Homelessness

All

Homelessness. Crawley has one of the highest homeless rate in Sussex. To turn a blind eye to it and only cater to paying residents is socially selfish

More social housing and affordable housing required.

Older single people (Divorced)

Single men.

Young families who need a garden

Young first time buyers who already have children, families with 2 children.

Homeless people and people who have become homeless due to substance misuse issues.

Young families need more help to buy schemes and need more properties which are affordable for first time buyers

Large families

Sole occupiers and large family groups.

The poor and men.

See above

The working people who are going out, working hard to earn an honest wage. They don't qualify (nor could get) council housing, or housing association. Yet at a time when mortgages are at an all-time low, we are being stung by extortionate rentals.

Single men, bottom of the housing list for good reasons but it does make them feel helpless

Young people who are in need

Young people who cannot afford a mortgage

All groups

Homeless (living on the streets only!)

No comment

Young people and families on low income

Younger families.

None

Priority shouldn't be based on if you are family or single current is disproportionate towards single man, regardless of whether they are working or not they should have just as much chance of getting housed.

There are too many single men on the streets of Crawley that our street homeless it should not be because of their sex that they are kept from having an equal footing for social As quite a few of them have the same emotional drawbacks as their female counterparts

Affordable housing

I can't help but notice people living on the streets. I gather Open House cannot meet demand.

There a shortage in aged accommodation.

Young with families

Those on low incomes and those on Universal credit. Rents are out of reach of many low earners. Few landlords take people on Universal Credit. • Those who need support to live, nominally, independently.

No comment

Nothing comes to mind.

£1m plus.

n/k  
 Ethnic, disabled people, old people  
 Young single people.  
 All  
 Elderly  
 Those wanting to have a house instead of a flat.  
 Shelter for the homeless, use the empty shops.  
 Disabled and mentally ill people. Rough and homeless people.

**Council Responses:**

Responses identify a range of groups and seem to reflect a perception of a general shortage of housing. Policy H1 (Housing Provision) seeks to address the overall balance of housing need and supply in the context of the constraints faced by Crawley borough.  
 Responses highlight the need for provision of a range of housing sizes catering for different household sizes and structures. This is consistent with the approach in Policy H4 (Affordable Housing), which is informed by the updated SHMA.  
 Older people, the disabled, and those with health conditions are identified as groups requiring specific physical forms or tenures of housing. In terms of the physical layout of housing Policy DD2 (Inclusive Design) sets a requirement for all new dwellings to meet the standard of Building Regulations Part M (2) – accessible and adaptable dwellings, with 5% on major schemes meeting wheelchair accessible standards. Policy H2 (Key Housing Sites) includes allocation for housing for older people.  
 Affordability is cited as a general issue and various groups are identified as being disadvantaged in various ways by financial barriers to the most suitable forms of housing, ranging from those unable to provide a deposit for a mortgage to those who are unable to meet their housing needs via the market at all (including homeless people). Responses suggest that younger people are less financially able to access appropriate housing. On the basis of evidence for affordable need detailed in the SHMA Policy H5 (Affordable Housing) seeks 40% affordable housing with a 75%/25% split between social/affordable rent and affordable home ownership tenures. Policy H6 sets a framework for treatment of applications for Build-to-Rent housing, including private market and affordable elements, which is likely to provide greater rental security and should be suitable for younger households.

**What types of housing should be prioritised in new developments over the period 2020-2035?**

Anything catering for the homeless and elderly.  
 Properties built around courtyards to improve interaction between residents  
 Family homes with garden/outside space.  
 Affordable housing and shared ownership - so people can actually get on the property ladder!  
 Small housing for the older generation consisting of 1 or 2 houses or bungalows  
 Young adults who are on a very low income benefits and Crawley born residents before anyone else who comes over from Europe  
 People who live in Crawley young families  
 All  
 Flats & \$ bedroom houses.  
 Houses  
 Social housing for small households.  
 Elderly, this would allow them to free up larger properties for families  
 In other European countries 3 bedroom flats are available, would be good to see that option in Crawley.  
 That could be good solution for someone who cannot afford to buy a house as flats are cheaper. Balcony is a must.  
 3 beds to band b  
 Bedsits and HMOs for younger people. Small houses - 3 bedroom houses Private, 3 to 5 bedrooms.  
 Studios and 1 bedrooms, 3 and 4 bedroom houses.  
 Flats for council tenants. Not so many houses. We have a lack of council properties not private houses for sale. Also very small single facilities for single people for example a one rooms self-contained unit, e.g. room, bathroom, open kitchette, places designed for people to go to get back up on their feet, not long term living.  
 See above  
 Something for those above mentioned working families.  
 1-2 bed flats or houses families are smaller these days no need for 4-5 bed houses  
 Families in low incomes who can't afford to rent privately and who want independence  
 Social housing  
 All types  
 Homeless (living on the streets only!) No comment

Affordable housing for people on low incomes

Affordable houses. Not flats.

Brownfield developments

All new properties should be based on 65% social housing 15% private housing and the remaining 20% should be part rent part buy for housing associations and the like there should be also brownfield land that's ring fenced for people who may be wanting to experience building their own home and having a plan to do so with financial support from local council that would be achievable and this would be a step for those that are maybe working and could contribute.

Affordable housing

More variety.

Plenty of social housing.

Smaller family units

Affordable houses • Council houses • Housing and village life suitable for active dementia patients to be safe and assisted. Can training courses/college provide work experience/placements for this? • Would an increase in the number of 'aspirational houses' attract more of the higher skilled people to the town?

No comment

Continued robustness from CBC in assessing viability on sites. It would be good to also have flex in the possibility for the provision of social rent. So 70/30 split for Affordable rent / Shared ownership, but flexibility for 50/50 on Social Rent and Shared ownership

Environmental housing. Solar panels and electric charging points.

Nothing, Crawley is already overpopulated.

£1m plus.

Depends on demographic – what is forecast?

Fairer cost to allow people in Move in and afford to live there

All types.

Green energy efficient developments

Well insulated with heat pumps and solar.

Affordable housing for younger, less well-off people.

Decent council housing.

Disabled.

Maisonettes

Flats

Bungalows.

Disabled and dementia and carers and garden.

#### **Council Responses:**

Respondents identify needs for housing of various physical types and sizes to accommodate households of different types and structures, along the lines of answers to earlier questions. This is consistent with the approach in Policy H4 (Future Housing Mix), which is informed by the updated SHMA.

There is widespread comment in support of prioritising affordable housing, including affordable/social rented and affordable home ownership. There is suggestion that this should be pushed as far as viability will allow. On the basis of evidence for affordable need detailed in the SHMA Policy H5 (Affordable Housing) seeks 40% affordable housing with a 75%/25% split between social/affordable rent and affordable home ownership tenures.

As in answers to previous sections a need for more communal and temporary forms of accommodation such as bed-sits and HMOs is identified, particularly in reference to younger people. Small HMOs benefit from permitted development rights, whereas larger ones are to be assessed in accordance with Policy H9. Policy H6 sets a framework for treatment of applications for Build-to-Rent housing, including private market and affordable elements, which is likely to provide greater rental security and should be suitable for younger households.

Older people and those with dementia are identified by some respondents as a priority. Policy H2 (Key Housing Sites) includes allocation for housing for older people, including sheltered/additional care accommodation.

Policy DD2 (Inclusive Design) also sets a requirement for all new dwellings to meet the standard of Building Regulations Part M (2) – accessible and adaptable dwellings, with 5% on major schemes meeting wheelchair accessible standards.

Some comments propose specific design approaches or features: courtyards, balconies, gardens. Issues around these are addressed in Policy DD3 (Standards for All New Dwellings (including conversions)) and other policies in the 'Design & Development Requirements' chapter of the Plan.

Self-build housing is identified as one type to be prioritised. Local Plan Policy H7 (Self and Custom Build) seeks better to address this need.

Responses show some concern for the introduction of higher environmental standards and greater carbon/energy efficiency. These issues are further addressed by the Plan in Policies SDC1 (Sustainable Design and Construction), SDC2 (District Energy Networks), and SDC3 (Tackling Water Stress).

**Where do you think new housing should be built over the period 2020-35?**

I think all neighbourhoods should be increasing their stock.

Policy H2: Land east of Balcombe Road/Street Hill, Pound Hill. I act on behalf of the Bucknall family – owners of the Housing, Biodiversity and Heritage Site allocated within Policy H2 (Key Housing Sites) in the Crawley Borough Local Plan 2015 – 2030. There are no changes in national policy which diminish the need for housing in the Borough or further constrain development. Up to date evidence in the form of the Standard Method Housing Need Calculation indicates a total need for 752 dwellings per annum during the Local Plan review period compared with the average annual requirement in the adopted Plan of 340 dwellings per annum. The draft Local Plan states that there will be an unmet housing need of approximately 6,475 dwellings within the Borough over the Plan period. It is clear from local evidence that effective use must be made of land already allocated in the Local Plan. The site remains eminently suitable to deliver 15 dwellings as previously confirmed by extensive evidence; the Local Plan Inspector's report and its allocation in the adopted Local Plan.

The site remains immediately available and there is a frustration in not being able to bring the site forward for development caused by the difficulties encountered in the production of a satisfactory and lawful Development Brief. The site can be delivered and is considered to be viable and achievable provided the Development Brief does not impose further restrictions and requirements beyond those agreed by the Local Plan Inspector and contained within adopted Local Plan Policy H2. There is strong justification for retaining Land east of Balcombe Road/Street Hill, Pound Hill as a deliverable Housing, Biodiversity and Heritage Site allocation within Policy H2 (Key Housing Sites) and the Bucknall family wish to strongly support its retention in the emerging Crawley Borough Local Plan 2020 – 2035.

On brownfield sites. No more building on greenfield sites. Our green woodpecker population has dwindled significantly due to depletion of green spaces. The area that is now Forge Wood had lots of wildlife until it was built on

Crawley has a ridiculous amount of empty offices. Adapt some of those.

I literally don't know - I am unhappy about the 10,000 house proposed for Ifield and also the fact that no one really cares - we have Kilnwood Vale, Woodgate in Pease Pottage and Forge Wood on the other side of Crawley and loads in town all over the place but it's not enough??? I just think Crawley is going to end up like Croydon and no one is going to want to live in a massive housing estate – the council are going to do it anyway and that's that, there's no choice in it for residents or wildlife and basically people who are rich will buy the housing and rent it out to the poorer people - nothing we can do!

The 1950s housing should be demolished and replaced with 1 or 2 bed accommodation for the retired.

Copthorne, Horley, Horsham

Is there anywhere left??!

No where

Not in Crawley. The infrastructure cannot take it.

Don't know

Brownfield sites

1) Over land currently in use for airport parking. 2) On remaining green areas between Crawley and Horsham 3) Take over abandoned retail space. 4) Outside but close to Crawley boundary.

There's not much room left, we have our last neighbourhood but I guess some garage blocks might be suitable.

Unfortunately I don't know.

Where there are long term empty retail and office units - e.g. longer than a year. Brownfield sites. On disused land and

Unfortunately we have run out of space,

Converting unused office space, land surrounding Crawley.

As stated above, clever building, houses purchased and demolished to make way for flats. There's lots of areas this can be done. Let's rework sites in Crawley. There are many, many council properties with huge gardens, these should be reworked landwise.

More use made of brownfield redevelopments and town centre with a higher density than hitherto (while ensuring that each residential unit affords adequate living space)

No idea.

Ifield is getting a huge development the only other place would be Bewbush due to the airport we can't build both so Bewbush will need to meet Kilnwood Vale at some point

Near to local amenities

Brownfield sites

Vast area of empty land West of Ifield

Town centre. There are loads of old and unused buildings

It would be prudent to include Units 1-7 Pegler Way and possibly the adjacent surface car park in the new Key Housing Site identified at the adjacent Shaw House. It is currently occupied by commercial units of little architectural merit which are struggling due to lack of footfall as the surrounding area has become more residential. For example, since 2010, 3 Pegler Way has been a convenience store, a Caribbean takeaway, a hairdresser, a convenience store and now back to a hairdresser. The site was previously identified in 'Crawley Traders Market and Land to the West Planning and Design Principles Document 2010' as a potential area for development as I strongly recommend that this is revisited. A development on the corner in particular would help revitalise the street scene on the approach from London Road, which is currently a disappointing view of surface car parking and the flank wall of the Islamic Centre.

On pieces of land that are not used.

Next to Faygate.

anywhere other than Crawley and its adjacent areas – it's about time that other parts of West Sussex starting taking the burden of new housing rather than attempting to dump it on Crawley

Brownfield sites old council offices disused buildings in and around Crawley that have not been occupied bit by business of residential use for more than two years.

In Crawley.

Unless we are prepared to demolish some New Town terraces it will have to be outside council boundaries.

Not everywhere can have more and more housing.

Brown field sites leaving the green spaces intact.

There is just no spare space other than the places already identified within the town. If there is no way to 'push-back' on the numbers of houses specified by national government, the only resort is to find space outside. But this increase the need for means of transport into the town.

No comment

As much as possible of the (supposedly) required new housing should be sited within the Borough's built-up area - rather than the 6475 units that it supposedly cannot forced upon neighbouring Horsham and Mid-Sussex Districts. to accommodate upon open countryside - if necessary by utilising more of the scattered 'green spaces' (largely comprising unkempt grass patches and scrub woodland) that characterise such areas as Bewbush, Broadfield and Ifield and were evidently left undeveloped by the estate developers at the time as surplus to their requirements.

I think there is enough new housing. If a town is full, then it's full. People want to have the quality of life.

Free range chickens have a certain amount of space for each bird, humans should too.

No More, Crawley is already overpopulated.

Land by BF/BB

Brownspace sites if poss.

Why not on industrial estate too?

The Town is growing and needs to accommodate the growth.

Under used playing fields.

Outside Borough in partnership with other authorities.

Nowhere unless infrastructure is improved.

Does Crawley have any land left?

Near K2 Leisure Centre

Pease Pottage

Any unused site and old unused building.

**Council Responses:**

Some respondents do not consider that there are any sites within the borough that are suitable for residential development. However the Government's Standard Method for the identification of housing need indicates a need for 752 additional dwellings on average arising in Crawley over the Local Plan period.

There may be scope for part of this need to be met outside of the borough boundaries, as in the currently adopted Local Plans for Horsham and Mid Sussex. At the same time it is important for the council to show that it is leaving no stone unturned in seeking to meet the need within Crawley. This is particularly so in light of the focus in national policy on increasing residential density within existing settlements while retaining strong protections for the Greenbelt. This means giving consideration to potentially suitable sites, and only excluding sites when there is evidence to justify this.

There is some support for the focusing of development on Brownfield sites in general as opposed to Greenfield sites. Most of the housing land supply pipeline identified in the Housing Trajectory and Strategic Housing Land Availability Assessment (SHLAA) does indeed comprise sites which are partially or wholly Brownfield. Most of the allocations which are not Brownfield are subject to requirements for mitigation of impact on open space facilities or on land subject to other designations.

Certain types of Brownfield Land are identified as being potentially suitable: airport car parking; disused offices and retail premises; and garage blocks. No airport parking sites are proposed for allocation due to their locations being considered unsuitable or unsustainable for residential development. Some office buildings and areas of garaging are identified as suitable for residential development in the Housing Trajectory and Strategic Housing Land Availability Assessment. More generally the 'typologies' listed in the Housing chapter of the plan identify types of site (mainly Brownfield) where proposals for residential development might be expected.

There is some support expressed for intensification of existing residential land. Some of the sites identified in the Housing Trajectory and SHLAA are indeed of this nature. At the same time the Local Plan seeks to balance the push for more effective use of land against considerations of character and design, as supported in the Character, Design and Heritage chapters of the Plan.

While there is often merit in converting offices and other commercial buildings to residential use, the Local Plan proposes to protect commercial premises in designated employment areas in order to ensure that a good supply of potential premises is available to companies. Also some locations suitable for employment use are less suitable for residential development due to potential for conflicting land uses and poor quality of life/environmental health concerns around many of these areas.

The sites on Pegler Way (including Shaw House) which are referred to do form part of the council's identified housing land supply, as detailed in the SHLAA.

The allocation of Land East of Street Hill as a Housing, Biodiversity and Heritage Site is proposed to be retained as part of Local Plan Policy H2 (Key Housing Sites), as supported here.

**If a new neighbourhood is built just outside Crawley's boundaries, what should it include?**

I would hope that plans for a new hospital, or expansion to existing local hospitals would be considered in anticipation for this. Despite a rival plan for a Parkway Station in North Horsham, a Rail station should be fought for strongly. I would also hope for an extensive cycle link to coincide to link new development to the West of Crawley.

Good transport links, shops, schools, pubs, community hubs, trees

Schools, Doctors surgeries and shopping centres. Crawley hospital needs to be sorted out and serviced properly.

DOCTORS!!! SCHOOLS!!! Some green community areas and woodlands

As with any neighbourhood it should include a mix of 3 or 4 bed houses - infants and junior schools - a parade of shops - a doctors and dentist and a good bus service.

Restricted access to the public and only allow residents in with bus stops allowing the buses to have special access including taxis and family members but keep the youths out that are dealing illegal drugs and etc and a little police, fire and ambulance station small county mall and doctors surgery

Places for children and families All

I think that is a better idea. Greenery, modern design, nature reserve to not evict animals already there.

Transport schools and GP surgeries. Local shops

Infrastructure - Doctors, Dentist, Shops, School, Leisure/ Green space

Full facilities: schools, shops, household service industries (e.g. for cars), doctors' surgeries, dental surgeries, car parks, recreational areas.

We cannot sustain a large new neighbourhood as the infrastructure isn't suitable. We already have a shortage of GP and east Surrey hospital cannot cope with a 10000 property neighbourhood on top of what is already being built. Sort out access and a new hospital and things may change

Shops, school, playground. 3 beds

Shops

Schools

Community centres

Religious centres

Good bus and train links Into Crawley

Opportunities for mom and pop start-up businesses to encourage growth

Jobs or access to jobs from that location

Doctors, shops, sport centre, school?, the infrastructure needed to provide a quality of life without putting the strain on existing infrastructure

Schools

A GP practice, a school, (secondary education may also need to be considered) Neighbourhood shops, post office, play park and outside space, adequate car parking for the properties built.

You mean like Kilnwood Vale? School, doctors, a dentist with a NHS contract, a social hall, and a large shop such a Co-op/Tesco Express.

Full Bus services. Train station.

Good communal areas, park for children but also many areas left wild for the animals that have managed to survive after all the building, more hedges /more trees planted, not so much tarmac, areas for hedgehogs /birds/foxes/rabbits/bees!

A decent recycle facility for residents including lesser items such as batteries etc.

Finally when they do build they should try and put much more back into the development

Expanding the residential boundaries on existing green field sites would be a retrograde step (though loved by developers for ease of development).

Schools. Hospitals. These places are in desperate need. Doctors without that don't allow it.. schools also required

School, doctors, local affordable shops

Doctors surgery, schools, churches and shops

Shops, schools, Crawley Western Relief Road, Doctors, Big New Railway Station + ample parking.

Everything

No comment

Schools, medical centre, local shops School, shops, GP surgery,

I do not want a new neighbourhood built outside Crawley's boundaries. This is an unfair and leading question and is obviously designed to elicit support for Homes England's proposals for 10,000 new homes on land west of Ifield

As long as there is good transport links which clearly has a lot of it wouldn't really matter whereabouts this new neighbourhood would be built priority is transport links especially to places like Manor all the town centre and also Gatwick.

Affordable housing

The New Town neighbourhood model was a good one - local shops, public toilets, pub, church and community centre.

A new neighbourhood should not be built outside the boundaries.

No way.

It would have to include adequate services (schools, medical facilities etc.) as the town's services are already overstretched. • The neighbourhood principle is also important, but becomes more difficult to maintain as the town grows larger (new neighbourhoods become further from the centre facilities).

No comment

It should include some sort of police station because crime seems to be creeping out of control. There should also be some control for the traffic. The people are going to want to go into Crawley maybe a light rail link or a tram or a mono rail so they don't take their cars in.

No More, Crawley is already overpopulated.

School, Doctor, Dentist, Rail Station.

All the usual!

Schools, shops, doctors mixed housing, playing fields, youth centres

GP Surgery, school, shops

Hospital.

GP services

Shops

Social areas

Green space

Good transport links to transport hubs.

Shops, churches, pubs, playgrounds, community centres, schools, doctors, post office, cafes, car parks.

Shops, medical centres, community centre. Allotments.

**Council Responses:**

Policy H3g (Urban Extensions) of the Local Plan captures the categories of facilities/infrastructure identified here (if not each specific type of facility identified).

**ENVIRONMENTAL SUSTAINABILITY: GREEN INFRASTRUCTURE & BIODIVERSITY**

**Do you think biodiversity net gain should be a priority on new development sites? How do you think this could be done?**

Yes! Wildflower verges have been one of my favourite things Crawley has offered. I think 'living walls' would also work well both for new development and Town Centre regeneration to help reduce Urban Heat Island effect. Greenways linking developments would be great. Rooftop gardens would be a nice idea, even for Manor Royal developments.

I think if companies want to build in Crawley we should make them agree to prioritise biodiversity and the new development sites should have to conform to providing areas that benefit the ecosystems and incorporate the natural features that are already within our town.



Yes definitely. Include green spaces and work with organisations/charities such as the Wildlife Trusts, Kew, Hedgehog charities. They have the expertise and knowledge about what can be done at local level even down to the smallest of details such as providing hedgehog holes in garden walls and fences to create hedgehog highways.

Yes

Yes. Yes. Yes! I'd rather have a garden than a space for a car. Realising that just because a house CAN for in a space doesn't mean it should.

2 fossil fuel vehicles per house policy,

Yes Maintaining current standards of tree and shrub replacement yes - by sensitive planning and development

Attractive idea but very difficult in some sites - aim to minimize loss.

- Green corridors; planting and retention of hedgerows which are managed for habitats

Yes. There should be big wide corridors where people can relax and walk to places. E.g. to walk from Ifield to Charlwood or to Rusper.

Yes – build more Passive houses.

Solar power/wind

Recycle water for garden water/save water for drinking.

Not sure

Don't know what you mean.

.gov.uk (2017) encouraging biodiversity in new build, set out a clear view.

**Council Responses:** It is welcomed that steps taken to increase biodiversity net gain, such as wildflower verges, that have already incurred in Crawley have been recognised.

Policy GI1 of the Local Plan seeks to protect and enhance Crawley's green infrastructure, including the value of linking multiple green areas together is noted. Organisations noted to work with such as Wildlife Trust have submitted responses to this consultation and these are being taken into account. The Local Plan Policy GI2 requires all development proposals to meet the 10% net gain in biodiversity requirement.

**What would encourage you and your community to support habitat creation?**

Workshops across town which may be just showing residents how they can foster habitats in their own gardens and communal spaces.

The council making a positive effort for people to do that and maybe more reasons for people to take care of their area but more natural features around (like Bewbush have some lovely wood carvings) like when a tree is taken down they could do something creative there like make a bug house etc.

It wouldn't take much. I am all for it. I would be more than happy to get involved on a practical level Yes Anything. Showing endangerment of animals and what we can actively do to resolve that to show people their efforts aren't futile.

Council tax reduction if you have a 70% grass or bushes covered front and back garden Better knowledge and understanding of what works well and will survive.

as above - further protection for the threatened Ifield Brooks area

I'm involved in several projects but have not had much success in motivating others.

- Policy across the town of plants to be sown in gardens to encourage habitat creation. Don't just leave it to individual initiatives.
- Policy and programmes for maintenance of the waterways that flow through the town.
- Involvement of schools in the programmes. Such programmes would support the national curriculum objectives.

Maybe if people were asked face to face they might be interested. Many people may not be aware that they can be involved. Or they may not think that they have anything to offer.

Only support, and a good attitude, from the authority would work. At the moment they don't care.

Tax break

Gardening courses.

More Facilities "affordable"

Have nest boxes built into housing.

Solar power.

Education – talks, displays, nature walks (guided)

Don't know.

Allotments, garden on roofs. Green space factories.

Paths

**Council Responses** Policy GI2 of the Plan requires all development proposals to meet the 10% net gain in biodiversity requirement, and some of the suggestions made here such as green roofs have been referenced to encourage developers to incorporate types of habitats into planning applications at an early stage. Several good initiatives have been proposed which will be shared with the council's corporate teams

responsible for this type of work, such as through education and using physical exhibitions or workshops to raise awareness of habitat creation.

**What resources could be needed to promote pollination plans within local communities?**

The AMAZING seeds that have been put round some areas of Ifield and Bewbush are So lovely and everyone is so much more positive about helping the bees etc. when they see the council are trying too! Also work at children and family centres - workshops and positive easy ways to show people how to promote things like pollination in a cheaper way  
 Specialist information about pollinator species from wildflowers, grasses, shrubs and trees and suitability for specific areas and climate. Wildflower seeds that people can plant at home (already available from charities like Grow Wild). Information for schools and other organisations which have green spaces. Collaboration with local plant nurseries to promote and encourage gardeners to grow pollinator plants, even on a small scale  
 All  
 Social media updates. Use the billboards around three bridges to promote it as thousands of people drive through every day and would be great advertising for the town.  
 Crawley in bloom competition with the winner receiving a year off from council tax payments, should catch people's attention  
 this seems to be a way of building new communities - to understand their soil and seasonal changes CBC advice and support  
 Awards for the best habitat project may produce some interest.  
 • Information and help to plant appropriate vegetation. • Regime of maintenance of the habitats in public places • Information panels that explain the diversity of wildlife – plant and animal (as in Willoughby Fields).  
 Leaflets through doors to make people aware. Stands set up in the Tilgate Park at park run to get high volume of people. Stands in the town information in the library. Through schools and colleges and places of work. Website with chat page and email for contact. Facebook or twitter to keep people involved.  
 Suppression of stupid populace who destroy all the efforts of those who do not give their efforts in good faith.  
 Local Gardening courses.  
 Allotments.  
 Green roofs.  
 Flower meadows on council land not just grass verges but allow where we have large areas of land. Plant them with Meadow Flowers rather than lawns  
 Don't know.  
 Look at Berlin BioTope factor.  
 Areas of open water. Bat boxes.

**Council Responses:**

National Policy implements a similar scheme to the BioTope factor through Biodiversity, Pollination Plan and ensuring new developments provide a Net Gain to local natural capital. This biodiversity net gain requirement is included in Policy GI2 of the Local Plan. Suggestions such as bat boxes and roof gardens have been noted and can be shared with developers. Further suggestions involving advertising, competitions, campaigns and awards to increase public interest are beyond the remit of the Local Plan but these responses will be fed back to other departments within the council who can take them forward. The Green Infrastructure SPD Appendix 6: Suitable Plant Species for the Crawley Area lists the tree species, ground cover plants, shrubs and hedges as well as security plants that are suitable to be planted in Crawley.

**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?**

<p>Unless it already has a more powerful designation, Tilgate Park.          Ifield!!! The woods and mill pond!          Oh and Tilgate park and forest          Grattons park, Tilgate, Milton Mount, Worth Way          Tilgate park,          And all our playing fields.          Ifield Meadow          The Hawth          West Green Park.          Tilgate Park / Golf Courses</p>	<p>Not Sure          Don't know.          No but I would like new neighbourhoods to be surrounded by a green belt, even if narrow, for environmental reasons but also to create a sense of place for residents.          Many sites in Ifield are already protected with conservation area, SNCI and/or Local Green Space status. Information on SNCIs needs updating. We are not sure about the maintenance and protection of the Ifield Brook and the River Mole. Whose protection does this come under? • We assume that the land now owned by the Gurdwara is protected as it is in the Conservation Area. • Some trees on the Ifield Village Green and</p>
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All parks and gardens. yes - Ifield Brooks and the surrounding area	Playing field have had extensive bark bitten off by dogs. Can trees in public places be protected from this hazard? Crawley Borough Council to be rebuilt
<p><b>Council Responses:</b> The Local Plan Policy GI4 designates Ifield Brook Meadows and Rusper Road Playing Fields as a Local Green Space. All elements which make up Crawley's Green Infrastructure are protected by Policy GI1 as well as individual policies which protect specific open space area typologies. The Parks and Playing Fields referred to are protected by Policy OS1, and amenity areas around the neighbourhoods are identified and protected as Structural Landscaping. Policy GI3 protects ancient woodland and other biodiversity sites. The council seeks to protect trees within its ownership.</p>	

**ENVIRONMENTAL SUSTAINABILITY: SUSTAINABLE DESIGN & CONSTRUCTION**

**How do you think new developments can be designed in order to reduce their emissions and mitigate climate change?**

Solar or wind energy used - more sustainable building materials used and reusing materials rather than replacing stuff  
 The Centre for Alternative Technology in Machynlleth in Wales has a wealth of information on this subject  
 Ok  
 More bike railings. Oxford as inspiration  
 Must all have solar PV and heat pumps and limited to 1 fossil fuel car, but no limits on electric cars.  
 make it known the town centre has adequate transport and no parking will be allowed for people in town centre flats etc. like every other town we don't have enough parking and it is they should know moving into the properties means no vehicle  
 yes with proper planning and care  
 Changing building codes and transport systems will move in this direction. Developers of larger site can be encouraged to utilise rainwater on site rather than discharge to sewer or stormwater system.  
 Good quality insulation • Clusters of buildings so there are fewer outside walls for heat loss. • Well- fitting doors and windows. • Solar panels  
 Be built with solar power and hook ups for electric cars. Building materials to be locally sourced.  
 No more development without P.V.s  
 Yes – build more Passive houses.  
 Solar power/wind  
 Recycle water for garden water/save water for drinking.  
 Not Sure  
 Use of high efficient materials  
 Solar power & heat pumps  
 Removal of gas heating and cookers.  
 Increase trees planting  
 Solar power  
 Ensure bus and rail travel and cycle routes are easily accessible.  
 Grass walls.  
 Electric car charging.  
 Tree planting integrated in plans and landscaped as part of each property.  
 Don't know.  
 Air-conditioning for elderly. CSE.org UK centre for sustainable energy states it all.

**Council Responses:**  
 Local Plan Policy SDC1 sets energy efficiency requirements for new dwellings which go beyond Building Regulations while remaining consistent with National Planning Practice Guidance. In addition it states that climate change mitigation measures should be pursued in accordance with the 'Be Lean', 'Be Clean', 'Be Green', energy hierarchy. 'Be Lean' aspects include reduction in whole-life emissions, including those associated with demolition and construction. The widespread potential for solar PV in Crawley in particular is highlighted, but scope is allowed for other low/zero carbon energy sources, among which heat pumps are likely to be appropriate in many circumstances, although there is not considered to be significant potential for wind generation owing to the urban environment and constraints associated with the airport. Policy SDC1 makes provision to seek to mitigate the 'performance gap' between as-designed and as-built levels of fabric efficiency.  
 The council or other developers can go further and achieve more advanced standards (e.g. Passivhaus) on individual developments.  
 Local Plan Policy SDC3 sets more ambitious targets for water efficiency in residential developments, particularly those of strategic scale, which reflect the potential for efficiencies through rainwater harvesting.

Local Plan Policy ST2 and the Parking Standards Annex include provision in respect of electric vehicle charging points as part of new developments.

Decarbonisation of existing gas network (partly by conversion to hydrogen) is a government intention but is primarily an issue of retrofitting existing buildings and infrastructure, which is largely beyond scope of control of the planning system. The Town Hall energy centre is proposed to be gas-powered, but a central gas boiler can more easily be converted to hydrogen or other low/zero carbon fuel than individual boilers/cookers etc. within individual properties.

Green roofs/walls may be appropriate in some cases as provided by the council at the Bewbush Centre building. This should be considered among other options for achieving high environmental standards as part of the overall design in accordance with the policies in the Character and Development Requirements Chapters (e.g. Policies CL2, CL3, CL4, CL5 and DD1) and well as Policy GI1: Green Infrastructure and GI2: Biodiversity and Net Gain.

Local Plan Policies ST1 and ST2 (and Parking Standards Annex) promote the fulfilment of opportunities for sustainable travel, including through the provision of supporting infrastructure and links provided as part of new developments. The Parking Standards Annex acknowledges lesser need for parking in the Town Centre.

Tree Planting/Soft Landscaping is pursued through Local Plan Policies DD4 and DD5.

Local Plan Policy SDC1 includes provision to ensure that overheating is avoided through the cooling hierarchy.

**What types of new developments offer opportunities to improve the environmental performance of buildings in Crawley?**

Solar panels etc. All of them

Any

A++ electronics used. Space for plants. Renewable energy as a resource. All of them, they should all have solar PV and heat pumps.

n/a

solar power

See above.

P.V.s

Yes – build more Passive houses.

Solar power/wind

Recycle water for garden water/save water for drinking.

More efficient heating better pollination control

Energy efficient buildings with solar/heat pumps.

Micro Generation

Grass wall

More trees to absorb CO<sub>2</sub>

Electric car charging.

Don't know.

Low carbon saving.

How many of the recommendations will the developers agree to adopt.

**Council Responses:**

The responses to this question are similar to those made to the question 'How do you think new developments can be designed in order to reduce their emissions and mitigate climate change?', so the council's response to the earlier question is equally valid here.

**What types of low- and zero-carbon energy sources are most appropriate in Crawley?**

Don't know

Solar panels on all new buildings. Ground source heat pumps where possible Yes

Hydro-energy outside of Crawley that source Crawley. Solar energy panels as a must.

Solar PV and heat pumps.

fast electric bays for cars there hardly any chargers in town

solar power but not wind farms

Solar panels for houses with roofs facing south • Electricity (although this is not carbon free at source if from a coal or oil fired power station) • Heat pumps? Are they suitable for Crawley? • Wind turbine at Tilgate? (but these generate noise and are large – so could spoil a much-loved area)

P.V.s

Solar/Wind

More efficient heating better pollination control

Micro generation on all new CBC Building including heat pumps & solar.

Solar

Electric  
Don't know.  
Solar panels. Biomass technology.  
CHP (Micro CHP) ground source heat pump.  
Photovoltaics, solar hot water. Wind energy technology. Emitting low or no CO<sub>2</sub> emissions.

**Council Responses:**

The responses to this question are similar to those made to the question 'How do you think new developments can be designed in order to reduce their emissions and mitigate climate change?', so the council's response to the earlier question is equally valid here. Additionally the responses raise the issue of CHP and micro-CHP. Larger scale CHP is a low/zero-carbon energy source appropriate for district energy networks and as such is promoted in Policy SDC2.

**What steps does Crawley need to be taking now in order to achieve carbon neutrality by 2050?  
What measures would you prioritise?**

I think there should be a way (though not sure how) where there is a strong incentive for alternatives to private car travel, possibly starting with an initiative with Gatwick Diamond employers.

Waste output - cars and busses - traffic flow - more green spaces and trees.

Reduction in car usage. Electric buses. Cycle routes which are separate from other road users along complete routes.

No

There are several car garages in the industrial estate especially along Gatwick Road that contribute to a waste of energy and light pollution. Mercedes Benz garage ESPECIALLY! The lights are extremely bright and is 24 hours a day. It is not needed, not even for security! No one wants to window shop a Mercedes at 4am in the morning! It's such a waste and makes me upset.

All new housing and all existing properties need to be encouraged to have solar PV and heat pumps, by means of council tax cuts and even a cash incentive.

Pedestrianize the High Street.

the unmitigated and uncontrolled growth of Gatwick Airport.

It's unlikely that a large town without countryside can reach carbon neutrality.

Good insulation Temperature control, especially in large buildings

Reduction in the use of cars / cars in carbon absorbing planting.

Reduce the population.

Yes – build more Passive houses.

Solar power/wind

Recycle water for garden water/save water for drinking.

Not sure

- Transport
- Investment in trees, grass walls.
- Reduce car use

Monitor pollution from airport.

Don't know.

See above.

**Council Responses:**

The responses to this question are similar to those made to the question 'How do you think new developments can be designed in order to reduce their emissions and mitigate climate change?', so the council's response to the earlier question is equally valid here. In addition:

- The council would encourage households and businesses in Crawley to adopt energy efficient practices in their use of buildings and building services, however, this is typically not something which can be controlled via the planning process.
- Financial concessions to consumers e.g. supporting energy efficiency measures, electricity for vehicle charging, or use of public transport are beyond scope of planning policy.
- Gatwick Airport enjoys nationally set permitted development rights for many types of development within the airport boundary. The activities of the airport in its current configuration (including monitoring of environmental indicators) are subject to regulation by an overarching S106 agreement. Developments involving major growth in scale of airport operations constitute Nationally Significant Infrastructure Projects (NSIPs), which are subject to a national consent regime, and thus not within direct scope of the Local Plan.

**ENVIRONMENTAL SUSTAINABILITY: ENVIRONMENTAL PROTECTION**

**Do you know of any areas of Crawley particularly affected by certain types of pollution?**

Noise pollution from LGW, which is why I oppose any substantial expansion to the Airport. Where I live in Langley Green, the noise can be unbearable.  
Noise from the airport can be heard from most of the town at some points - road noise from the A23 - buses in town put out quite a lot of exhaust fumes - round the new builds lots of banging - noise and dirt/dust, also a lot of redoing the roads  
No  
Again, light pollution and energy wasting around manor royal Three bridges station  
No  
Yes - areas adjacent to the M25, Manor Royal and around Gatwick Airport No.  
Ifield, Langley Green and Forge Wood – from aircraft noise and pollution (we can smell the fuel in Ifield when the wind blows from the north) • Noise from roads on east and south of the town, on either side of the A23 and on road that links Tushmore Roundabout to the M23.  
Nothing comes to mind.  
W/G [West Green] S/G [Southgate] etc. car pollution  
No  
Air quality in Three Bridges  
Airport/ Industrial Estate – high air pollution in Pound Hill and Three Bridges.  
M23 – high pollution to settlements bordering the M23.  
Areas around the level crossings.  
Pound Hill – noise pollution from airport.  
Tilgate suffers a smell from Pease Pottage compost facility.  
Broadfield as the houses are so close together, the build up of pollution must be great.  
Hazelwick Roundabout.  
Road works need monitoring.  
Three Bridges train. Air.  
KFC and other shops fumes in Air.

**Council Responses:**

The council notes the concerns raised regarding pollution in Crawley, particularly with regard to noise from aircraft and traffic, and air quality. The Local Plan's policy position with regard to noise has been strengthened and noise sensitive development, such as housing, is prevented in areas considered to be unacceptably noisy. The Local Plan includes locally specific noise guidance because of the importance of this issue in the borough. The Plan includes detailed policies on Air Quality, as well as light pollution and other Town Centre and Economic Growth policies protect residential amenity from nuisance, including noise, odours etc. Environmental Health legislation also covers these issues.

**Are there any types of pollution which you would like to see better controlled? How do you think this could be achieved?**

Despite the interest in residential development north of Langley Green's current built area, I do wonder if woodland planting would be a somewhat helpful noise abatement strategy- especially with a possibility of a major relief road considered.  
Not sure what we can do - accept not build so many houses  
No  
Cars that are environmentally unfriendly.  
Nox levels around town and three bridges. Less traffic needed, open up the Maidenbower M23 junction both ways. And make it compulsory to have low Nox boilers for all domestic, commercial and industrial natural gas, LPG and oil boilers in Crawley, if you don't you get a fine.  
Technology should be used to the full to improve air quality etc. and there should be a programme of increasing the number of trees and similar  
noise, air pollution and traffic growth. Better monitoring and awareness and a resolve to actually address the issues  
Throwing rubbish on the ground is common in Crawley. The High Street can be pretty disgusting on Sunday mornings. Needs schools education and public campaigning. I am not attracted to on the spot fines, especially via private contractors.  
Noise from traffic. The east and south sides of the town are subjected to a permanent hum of traffic from the M23, 24/7. This also cuts through the Tilgate Forest Area. There is possibly nothing that can be done about it now, but we need to learn from this that roads produce a lot of continuous noise.  
Noise from shops in the Queen's Square that put large loudspeakers outside their shops and blare music out. Are there any controls on this?  
Humans; there are already too many in Crawley.

Cars/Noise  
 Rubbish Dumping  
 Noise and Light  
 Noise from airport – use quieter aeroplanes.  
 Encourage use of electric cars.  
 Improve cycling routes.  
 Traffic fumes and noise. More buses to get cars off the roads, and people using public transport.  
 Get rid of litter.  
 Tidy up the green areas.  
 Check food outlet shops  
 And vents.

**Council Responses:**

The Local Plan is able to support greater use of sustainable technologies in developments, which will help to offset the environmental impacts of humans. The council's emerging transport strategy, and the Local Plan's policies prioritise sustainable transport and electric vehicle charging points are now required through the Parking Standards. Tree planting, or contributions towards it, is required from new development. The Local Plan includes detailed policies on noise, air quality, light pollution and the protection of residential amenity, as well as these issues being covered by Environmental Health legislation.

**More stringent criteria are proposed to reduce the number of people exposed to unacceptable noise from aircraft. What are your thoughts on this approach?**

I don't know how this would be viable as we are so close to the airport - I recon it's a waste of money - put money into making it a nicer area to live - we all kkkw we live near an airport and it's not a big deal for most of us

Difficult to manage until electric planes are the norm.

Some parts of the population are always going to suffer at the expense of others. Any changes to flight paths should require airports to provide affected householders with compensation to upgrade soundproofing. A house I lived in previously was affected by a change to a flight path and airport authorities were completely unconcerned.

No

I agree. We need to be responsible for our earth. Just because Doris can't go on another holiday when she wants and the town wants more easy money doesn't mean we need to build another runway.

No night flights, no low flying, seems to be working fine.

Not as significant a problem as many consider given that aircraft are increasingly becoming quieter and this trend will continue. The increased availability of double glazing and loft/wall insulation substantially mitigates the issue

Planes have to go somewhere when the landing goes wrong I hear about 1 flight a week living in Pound Hill this isn't an issue

it is long overdue

Not a problem in Tilgate.

We are not sure what this entails. Any reduction is welcome.

The problem is that it is often thought of in terms of how well houses are insulated from noise, rather than considering the noise in open spaces.

The airport and planes don't bother me currently

Get rid of the people.

Less Bars/ Clubs/ Pubs/

I don't have issue with aircraft noise.

Support

None.

Fit better double glazing reduce noise level.

**Council Responses:**

It is recognised different people have different perceptions as to when noise becomes an issue. Planning policy in the Local Plan requires appropriate mitigation for new noise sensitive development, and can steer residential and other noise sensitive uses away from areas where noise exposure would be unacceptable.

The Local Plan's policy position with regard to noise has been strengthened and noise sensitive development, such as housing, is prevented in areas considered to be unacceptably noisy. The Local Plan includes a locally specific Noise Annex setting thresholds to identify where noise is unacceptable, as well as a Technical Appendix on Noise because of the importance of this issue in the borough.

**ENVIRONMENTAL SUSTAINABILITY: SUSTAINABLE TRANSPORT**

**What aspects of the transport system in and around Crawley work well?**

Bus service is fairly comprehensive, though journeys that don't involve the town centre aren't always well served. Routes for cycling are there but fragmented. Provision of bridges and subways prevent the A23 causing too much severance.  
I think the buses have improved year on year.  
Constant buses :) trains are ok! Roads are easy and good most of the time! Walking. Lots of footpaths, pavements and routes across parks away from traffic  
All  
Buses  
Buses  
All are gradually deteriorating - none are perceived as working well n/a  
the buses  
Public transport is generally good but expensive for short journeys, especially if a change of bus is required. The changes to the road system through Three Bridges have helped.  
Walking routes from neighbourhoods to the Town Centre. • Having main roads between neighbourhoods, not through them. • Bus service into the centre of town. • Direct Train links to: neighbouring town of Horsham; London and further north to Peterborough; the south coast (from Eastbourne through to Portsmouth); and of course the intermediate stations • One-change train links to Dorking. Guildford and Reading and East Grinstead. • Some good cycle paths (Worth Way) • Some good walking routes, such as the greenway. • Adequate space for car transport outside peak periods (of which there are three – start of work and school; end of school day; end of work day).  
I have a car but have found the bus service in Crawley to be quite good. The number 2 to town and K2 and the frequent bus that goes out to the airport.  
Bus, Rail, Walk, Run, Jog.  
Buses  
Buses, mini cabs, trains  
Buses but the roads are not always suitable!  
Three Bridges Station is good but not very accessible. Car parking is an issue. Rail fares too expensive and service poor.  
Bus links are good.  
Cycle routes need improving.  
Buses 2, 10 and 20 are frequent and well-used.  
Buses support disabled transport (more needed)  
Paths for cyclists needed.

**Council Responses:**

The council notes that many responses feel that public transport provision and particularly the bus network within Crawley work well, although there is identified scope for improvements, and concern with prices/service standards. Favourable views in respect of walking/cycling provision are noted, as well as suggestions for improvements.

**What aspects of the transport system in and around Crawley work less well? How could these be improved?**

Quality of existing cycling infrastructure is poor in places and badly maintained. Similarly with pavements. Parking on pavements and grass verges is a problem in Ifield and action should be taken to discourage this.  
The buses are extremely helpful and consistently serve the area in and out of the Borough boundaries.  
Don't know  
Cycle routes, Often too narrow and shared with pedestrians or other road users. A better maintained cycle route from Tilgate and all the way to Three Bridges Station  
All  
Trains but that's not necessarily something our council can control  
Cars, dreadful  
Roads - both main and urban are too narrow. The major roads could and should be widened into three lanes and traffic lights abolished to ensure traffic flow speeds up. Local/urban roads, wherever possible should be widened because most are reduced to single lane because of car parking. More work needed to alleviate pinch points and to discourage the use of narrow country roads as rat-runs.  
Bus lanes on Southgate Avenue. I've never seen anything more pointless get rid of them especially the one leaving town centre to Broadfield Stadium.  
Too many cars



The road system has become clogged in many places. Pedestrian subways would help in places where crossings are near major roundabouts.

Bus routes are mostly into the centre of town. Going to K2 from Ifield, for instance, by bus takes about 50 minutes and takes us right round the town. By car the journey is about 10 minutes. Are modifications of bus networks possible? Subways under major roads are not well used as people are frightened to use them. (The fear is probably unjustified). We have a particular problem in Ifield Village of road humps to slow traffic down. These cause loud bangs every time a lorry with an empty skip goes over them.

Legislation to prohibit lorries cutting through the village is non effective.

Policies that discourage car use at peak times might help (e.g. workers living within a two mile radius of a work not being able to arrive by car.)

School run mental cases and many others who should not be driving at all, under existing law, re: medical circumstances.

Trains

Cars

Bikes

Buses, mini cabs, trains

Three Bridges Station is good but not very accessible. Car parking is an issue. Rail fares too expensive and service poor.

Cycle routes need improving.

Cycle paths are disjointed, badly maintained and broken up with bus stops etc. e.g. Southgate Ave.

Dedicated cycle paths, clearly labelled, and separated from motor traffic and from pedestrians, would make cycling safer and more attractive.

Direct cycle path N – S across town centre connecting to Southgate Avenue.

Buses support disabled transport (more needed)

Paths for cyclists needed.

**Council Responses:**

The Infrastructure Plan sets out the Local Planning Authority's current understanding of the position in respect of the various forms of Infrastructure provision, including Transport.

Some respondents suggest cycle provision is poor and in need of improvement, and some scope is identified to improve the bus network. The council is seeking to improve this through the Local Plan by means of Policy ST1 in particular which will secure developer contributions towards walking/cycling/public transport infrastructure improvements and secure better provision/access to new developments. These will work alongside the emerging Transport Strategy and Local Cycling and Walking Infrastructure Plan.

Responses reflect strains/capacity issues on the road network in various locations. Local Plan Policy ST4 safeguards land for a potential link road between the A23 and A264 (within Horsham District) to relieve existing congestion and respond to anticipated growth at Gatwick Airport and to the west of Crawley.

Transport Assessment will be updated to take account of currently proposed levels of development. As set out in the Infrastructure Plan, mitigation at key junctions elsewhere is anticipated to relieve parts of the network which would otherwise be pushed over capacity by development projected over the Local Plan period.

Improvements (including access improvements) to Crawley, Three Bridges and Gatwick Airport stations are programmed for the early part of the Local Plan period. Local Plan policy ST3 provides a framework whereby developments close to stations will be expected to reinforce their functions.

Some of the issues raised (ticket pricing, driving license requirements) are outside of the scope of influence of the Local Plan.

**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)?**

Other than the airport, no two destinations in Crawley are more than 5 miles apart, which makes all journeys a 30 minute bike ride at most.

Could do with more cycle lanes All

Cycle lanes

Its ok, I suppose better traffic separated cycling routes from every neighbourhood to Gatwick would be good.

There needs to be more encouragement of walking and cycling and use of public transport.

Many roads are reduced to one lane because of parked cars. Often the road corridors are wide.

Enough but valuable road space is used for green verges, sometimes in poor order. Low-cut grass is not especially valuable environmentally so instead of a couple of parking schemes a year I would like to see large scale redevelopment of green verges into car parking. I note that there is discussion at Westminster of making parking on footpaths illegal. Should this happen there would be something of a parking crisis in Crawley so I would like to see action in this direction ASAP.

<p>Might the 'safeguarded' land be used for a park and ride? Has there been research into whether Park and Ride do in fact reduce pollution in an area?  Nothing comes to mind.  Cycle routes and park  I have noticed there could be more cycling areas created needed.  Walking would be easier if cars were made to use the main road of Crawley. Rat runs and cut-throughs give the perception of not being safe for pedestrians.  Look at reducing cars entering the town centre.  Provide drop curbs and more paths for wheelchairs and buggies.</p>		
<p><b>Council Responses:</b>  There is significant emphasis here on improvements to cycling and walking networks. The council is seeking to improve these through the Local Plan by means of Policy ST1 in particular which will secure developer contributions towards walking/cycling/public transport infrastructure improvements and secure better provision/access to new developments. These will work alongside the emerging Transport Strategy and Local Cycling and Walking Infrastructure Plan.  Scope for Park &amp; Ride to bring benefits has been assessed in the past but not found to be justified in present circumstances but this conclusion will be reassessed as part of the Local Plan Transport Assessment.  There is some appetite for parking schemes to relieve parking pressures in some neighbourhoods. These could come forward in the context of the proposed Local Plan approach, but initiative for these is more of a corporate issue than an issue for Local Planning Policy.</p>		
<p><b>In what key ways would you like transport in Crawley to be different in 2035?</b></p>		
<p>More bikes, more walking, many less cars!  Multi-modal needs embracing. A park and ride may be of benefit.  Economically friendly  All electric vehicles on the roads  All  More scenic areas encourage cycling and walking. That's why people do it in Oxford and Bournemouth.  Less cars see above  high street closed to cars improvements to public transport  Fewer cars in general • Lower proportion of diesel cars • Higher proportion of electric (or hybrid cars) cars • Better public transport system • Electric charging points for cars built into new developments • Safer cycle routes.  If buses could run on alternative fuels.  Less cars, due to reduced population. I know several households where they have more cars than drivers.  Bikes and walking  Environmentally friendly  More electric cars  More walking and cycling.  Cheaper rail fares.  Drastic reduction in cars, allowing freely moving traffic in Crawley – especially Tilgate's – narrow roads.  A tram (bring back)</p>		
<p><b>Council Responses:</b>  The council is seeking to improve cycling and walking provision through the Local Plan by means of Policy ST1 in particular which will secure developer contributions towards walking/cycling/public transport infrastructure improvements and secure better provision/access to new developments. These will work alongside the emerging Transport Strategy and Local Cycling and Walking Infrastructure Plan.  Electric vehicle charging in new developments is supported through Local Plan policy ST2 and the Parking Standards Annex.  There are current plans to introduce hydrogen fuelled buses into Crawley in 2020.  Scope for Park &amp; Ride to bring benefits has been assessed in the past but not found to be justified in present circumstances but this conclusion will be reassessed as part of the Local Plan Transport Assessment  Some of the issues raised (rail fares) are beyond scope of influence of the Local Plan.</p>		
<p><b>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?</b></p>		
<p>Yes, if needed to support new housing. Essential that it isn't just a way to encourage more car journeys though.</p>	<p>No. Too much damage to the environment  It would be far preferable and probably cheaper to improve the existing A264/A23 by making it three-lane</p>	<p>Need to look at map and need longer time to</p>

<p>I have no doubt that this will come close to my home, but I think it's totally necessary – especially with either Gatwick and possible westerly developments in the future. I think it could benefit the northern fringes of Langley Green and Ifield.</p> <p>Probably but you would have to ruin a lot of pretty space and lovely houses etc. to do it!</p> <p>All</p> <p>Yes</p> <p>Yes</p> <p>yes</p> <p>Yes</p> <p>Undoubtedly. Just look at the traffic on the A264 to Pease Pottage to see the value of these bypass roads.</p> <p>Yes</p> <p>Yes. &amp; a new railway station</p> <p>Yes.</p> <p>Any relief road would be a good idea.</p>	<p>No - this is not needed and will only serve to create yet more private car usage as well as destroying more of Crawley's rural surroundings</p> <p>The disadvantages are considerable: • town would then be surrounded on all sides by major roads with the added pollution and noise. • opening up new roads encourages more use of cars as opposed to public transport. • It would cut through the network of rural footpaths and farmed countryside to the west of Ifield • housing tends to be built up to and beyond such roads. It is a chicken and egg situation - the A23 was built as a by-pass to Crawley. It now runs through large areas of the town. The M23 was built as another bypass, but building goes right up to it and beyond. The A264 was built as a by-pass on the southern border, but building now goes right up to it and either side of it. Where does it stop? Where does the Town in the Countryside concept of Crawley just become a conveniently forgotten dream?</p> <p>County Oak is often jammed with traffic. Cars go in the car park then there is only one way out. The same with the road to the recycling centre and where Aldi wickes and marks and Spencer is. Bringing traffic to that area more directly will only make it worse.</p> <p>No I don't.</p> <p>No.</p>	<p>examine this question.</p>
<p><b>Council Responses:</b></p> <p>Recognition of the need for the road to support new development west of Crawley, and potentially growth at Gatwick Airport, is noted. However, the concerns regarding the environmental impact and encouraging private car usage are also fully appreciated. The Local Plan includes a policy for a Link Road, because of the cumulative impact of potential levels of development close to Crawley which will exacerbate existing capacity problems in Crawley. However, it requires the design and route of the road to take account of its impact on residential properties, the flood plain, the rural landscape, local biodiversity, heritage assets and visual intrusion. It should also maintain and enhance connectivity for non-vehicular movements from Crawley into the countryside, as well as the take account of the requirements for providing bus priority measures. Other policies in the Plan, including the Urban Extensions policy prioritise sustainable transport modes for providing the most direct access from new developments.</p>		

## Comments Received at Consultation Events

Representor/ Representation Reference	Name/ Organisation	Comments
<b>General Feedback</b>		
REP9/029	County Mall 2	Is the new Local Plan available for purchase?
REP10/030	County Mall 3	Have consultation at Three Bridges Station? Gatwick?
REP33/076	K2 Crawley 12	Broadfield Park – building Broadfield House vacant last 6 months. What happens next?
REP33/077	K2 Crawley 12	What are the rules on busking?
REP49/114	Crawley Library 9	Tourist Trap – Leicester Square. How does the council identify firms to work with?
REP67/179	County Mall 18	Re: Housing Waiting List.
REP73/189	County Mall 24	Anything happening with... <ul style="list-style-type: none"> <li>- TA site</li> <li>- Telephone exchange?</li> </ul>
REP112/323	Crawley Library 14	Whenever I see something text and images (like this big map) it is very hard to visualise. What exactly are we being asked to consider? Is this a 'structure plan' of Crawley?
<b>Character &amp; Design</b>		
REP12/032	County Mall 5	Destroyed already – too many flats.
REP18/040 (repeated below in Crawley Town Centre; Housing; and Sustainable Transport)	County Mall 11	Too much bias towards flats rather than houses in the town centre – however, would make a far better environment and people would have less need to drive.
REP20/42	County Mall 13	Design policies in place but not being enacted. Crawley 'abused' by developers. Should use Design Review Panels. Architect.
REP47/108	Crawley Library 7	A wider view on future town planning. Focus on Community Hubs that includes space for meeting other residents and potentially working in those areas.
REP49/113	Crawley Library 9	Is the Local Plan integrated? Crawley has many different communities.
REP79/195	County Mall 30	It doesn't matter what residents think, planning applications go ahead anyway. Northgate Road – included garden for 3.3m rule to Kilnmead Car Park. Cuts off light. Not Juliet Balconies (left details for follow up)

Representor/ Representation Reference	Name/ Organisation	Comments
REP81/197 (repeated below Open Space, Sport & Recreation; and Crawley Town Centre)	County Mall 31	Open Space for houses/flats in town centre – people are unlikely to want to let their children play in Memorial Gardens.
<b>Landscape Character &amp; Landscaping</b>		
REP48/111	Crawley Library 8	Verges – removal for parking access to front of properties; harmful to street scene.
REP63/169 (repeated below in Open Space, Sport & Recreation; and Housing)	County Mall 14	Loss of Countryside/Open Spaces – big concern.
REP75/191 (repeated below in Open Space, Sport & Recreation; Housing; and Green Infrastructure)	County Mall 26	Needs: Keep and more access to natural green spaces and countryside (in Crawley Borough and land West of Ifield mentioned as well).
REP92/240 (repeated below in Economic Growth)	Town Hall 2	Promoting land for development at Jersey Farm and outside Built-Up Area Boundary/Safeguarding.
REP117/330 (repeated below in Green Infrastructure & Biodiversity)	Crawley Library 19	Where is the stuff about types of appropriate trees and which trees we currently have in Crawley?
<b>Heritage</b>		
REP23/063	K2 Crawley 2	Pound Hill: Oldest industrial building on Forge Wood lane? Unhappy that the council did not save the Forge.
REP91/239	Town Hall 1	General discussion re: listed/locally listed buildings. Disappointed Bar Med was demolished – don't like the Morrisons.
<b>Open Space, Sport &amp; Recreation</b>		
REP25/066 (repeated below 12. Housing)	K2 Crawley 4	Open Spaces – don't build on them.
REP34/078	K2 Crawley 13	There is no straight route to the park from the residential area of Bewbush, instead have to go all around the dual carriage way.

Representor/ Representation Reference	Name/ Organisation	Comments
REP38/082 (repeated below 13. Green Infrastructure)	K2 Crawley 17	Tilgate Park – really special, needs recognition and protection.
REP44/104	Crawley Library 4	Questions for allotments that they will be 20 and where they are in the area. That we need more allotments and in general farms to buy organic products.
REP45/105	Crawley Library 5	Open Space – very valuable; don't build on them.
REP46/107	Crawley Library 6	Broadfield Park – what's happening there? (Friends of Broadfield Park rep).
REP48/109	Crawley Library 8	Protect Tilgate Park
REP63/169 (repeat)	County Mall 14	Loss of Countryside/Open Spaces – big concern.
REP66/174	County Mall 17	Protect green spaces.
REP75/191 (repeat)	County Mall 26	Needs: Keep and more access to natural green spaces and countryside (in Crawley Borough and land West of Ifield mentioned as well).
REP77/193 (repeated below in full in Housing)	County Mall 28	Ifield Golf Course – about 70% of users are from within Crawley.
REP81/197 (repeat)	County Mall 31	Open Space for houses/flats in town centre – people are unlikely to want to let their children play in Memorial Gardens.
<b>Infrastructure Provision</b>		
REP8/027	County Mall 1	Forge Wood – What about Medical Facilities? What about Education Provision?
REP11/031	County Mall 4	Saxonbrook Medical Centre Town Centre already full. How will GP's cope with extra Town Centre Population? <i>Comment also repeated in Chapter 11. Crawley Town Centre to same reference number.</i>
REP16/036	County Mall 9	Ashford Local Plan for telecommunication broadband. Have two networks to promote competition. Forge Wood doesn't have cabling to connect to Open Reach and Virgin.
REP27/070	K2 Crawley 6	Are we building a new reservoir?
REP36/080 (repeated below in 12. Housing)	K2 Crawley 15	You really don't care. The council and the government. If you did then why is all the development coming here? What about the schools, doctors? I don't believe anything will happen so I won't be putting in a questionnaire.
REP63/168 (repeated below in Sustainable Transport)	County Mall 14	Infrastructure – roads.

Representor/ Representation Reference	Name/ Organisation	Comments
REP69/181	County Mall 20	Needs: NHS Doctor/Clinical Facilities New Buildings.
REP71/186	County Mall 21	Why no A/E in Crawley? Walk in only.
REP72/188	County Mall 23	Need for youth facilities to deter younger people from getting involved in gangs/crime.
REP114/325 (repeated below in Sustainable Transport)	Crawley Library 16	Not enough parking for library.
<b>Economic Growth</b>		
REP42/099	Crawley Library 2	Arts and Culture – for example the St. Catherine’s hearts in Crawley are really positive. The news only tends to reflect the negative but there is lots good about Crawley.
REP66/177	County Mall 17	Less AI which is taking away jobs.
REP92/240 (repeat)	Town Hall 2	Promoting land for development at Jersey Farm and outside Built-Up Area Boundary/Safeguarding.
<b>Gatwick Airport</b>		
REP15/035	County Mall 8	Support Second Runway at Gatwick in order to support economy and jobs. Keep safeguarding.
REP24/065	K2 Crawley 3	Gatwick Airport – what’s happening? Runway expansion? What does this mean? Has the full use of the emergency runway been approved?
REP25/068	K2 Crawley 4	Gatwick Airport – what’s happening with expansion? Protect land – will need it for all the new people coming to live in the area.
REP66/178	County Mall 17	Jobs at the airport are really low paid.
REP71/187	County Mall 22	Gatwick Second Runway – yes please.
REP76/192	County Mall 27	Airport needs additional runway because at moment terminals are too claustrophobic and stressful on airside.
REP91/237	Town Hall 1	General discussion re: Gatwick Airport
REP92/241	Town Hall 2	Believe Gatwick Airport safeguarding is not justified – stopping development when it is uncertain if a runway on safeguarded land will happen.
REP113/324 (repeated below in Housing)	Crawley Library 15	Do you know what’s happening with Gatwick? You will have to build more houses if the airport expands.
<b>Crawley Town Centre</b>		
REP8/028	County Mall 1	Do something about shops and empty spaces above. Quality Restaurants required.

Representor/ Representation Reference	Name/ Organisation	Comments
REP11/031 (repeat)	County Mall 4	Saxonbrook Medical Centre Town Centre already full. How will GP's cope with extra Town Centre Population?
REP18/040 (repeat)	County Mall 11	Too much bias towards flats rather than houses in the town centre – however, would make a far better environment and people would have less need to drive.
REP41/098	Crawley Library 1	I think the Post Office should be put back in Crawley Town Centre – it is an important part of our community.
REP49/115	Crawley Library 9	Eating out in Crawley at the moment – very good offers and service.
REP70/184	County Mall 21	Fresh investment in shops to bring in trade – better trade. Shut old shops. Too many betting shops, nail bars, junk shops. More leisure. What about ice skating? Roller skating park? Expecting more pressure on K2 i.e. leisure.
REP81/197 (repeat)	County Mall 31	Open Space for houses/flats in town centre – people are unlikely to want to let their children play in Memorial Gardens.
REP91/236	Town Hall 1	General discussion re: development sites in town and permitted development.
<b>Housing</b>		
REP14/034	County Mall 7	Why does Forge Wood allocation still cover the whole area, including land to north outside the neighbourhood planning permission, which is too noisy?
REP18/040 (repeat)	County Mall 11	Too much bias towards flats rather than houses in the town centre – however, would make a far better environment and people would have less need to drive.
REP19/041	County Mall 12	Use more offices for residential – covert them to affordable housing for the vulnerable (e.g. in Manor Royal).
REP23/062	K2 Crawley 1	Will West of Ifield be truly affordable? Will Crawley people be able to get housing in West of Ifield?
REP23/064	K2 Crawley 1	West of Ifield? What's happening? Concern about the deer and wildlife on the land. Flooding – significant flooding, concern of increasing by additional development on the greenfields. Three estates? – concern of so much development When is West of Ifield coming forward – was told by Homes England by 2021?
REP25/066 (repeat)	K2 Crawley 4	Open Spaces – don't build on them.
REP25/067	K2 Crawley 4	Can we not go up?



Representor/ Representation Reference	Name/ Organisation	Comments
REP26/069	K2 Crawley 5	What's happening to land adjacent to Desmond Anderson? Are the County Council landbanking? It's been talked about since 2000. There is no flooding – I live next door and have never experienced flooding.
REP28/071	K2 Crawley 7	How can a developer find land in Crawley? Are there any sites available for housing?
REP29/072	K2 Crawley 8	What's Crawley doing to meet its own unmet need? (from Cuckfield Neighbourhood Plan Representative)
REP30/073	K2 Crawley 9	What's happening on land behind K2?
REP31/074	K2 Crawley 10	Who's going to live there (in new housing)?
REP32/075	K2 Crawley 11	It's the wrong housing mix. Too many small homes. We need family housing.
REP36/080 (repeat)	K2 Crawley 15	You really don't care. The council and the government. If you did then why is all the development coming here? What about the schools, doctors? I don't believe anything will happen so I won't be putting in a questionnaire.
REP37/081	K2 Crawley 16	Will any of the housing planned be affordable?
REP43/100	Crawley Library 3	Questions 11,000 homes – roughly the population? Which are the key policies?
REP43/101	Crawley Library 3	Comments over town centre prior approval development for housing.
REP43/102	Crawley Library 3	Housing brownfield and the stress.
REP43/103	Crawley Library 3	Land West of Ifield – contribute to 11,000 housing.
REP45/106	Crawley Library 5	Is there a point when Crawley is full and no more development/people can fit in?  More development = more growth need.
REP48/112	Crawley Library 8	Housing – incremental harm but know we need more.
REP49/116	Crawley Library 9	People living longer now. In Europe people rent – which provides more flexibility and people can more easily move for employment.
REP50/119	Crawley Library 10	Any vacant sites or properties (particularly for self-build)? [*contact details provided*]
REP63/169 (repeat)	County Mall 14	Loss of Countryside/Open Spaces – big concern.
REP64/172	County Mall 15	Extensions to Crawley should be decided by Crawley – boundary moved.

Representor/ Representation Reference	Name/ Organisation	Comments
REP65/173	County Mall 16	Good that Desmond Anderson site is proposed for housing as it's currently an eyesore – attracting fly-tipping etc. Only potential issue with location is access.
REP66/175	County Mall 17	We should be setting the standard – 50% should be affordable housing. Housing for police, army vets and hospital workers: 60hours a week just to pay rent as a care worker. More rights for leaseholders – lower fees (repeat below for Policy H6).
REP66/176	County Mall 17	More rights for leaseholders – lower fees (repeat).
REP74/190	County Mall 25	Ifield Golf Course – loss of jobs and biodiversity (woodpeckers)
REP75/191 (repeat)	County Mall 26	Needs: Keep and more access to natural green spaces and countryside (in Crawley Borough and land West of Ifield mentioned as well).
REP77/193 (repeat)	County Mall 28	Ifield Golf Course – about 70% of users are from within Crawley. Homes England site is still saying Crawley and Horsham are in support of West of Ifield.
REP78/194	County Mall 29	Crawley should expand over M23 towards East Grinstead etc. M23 was supposed to be the boundary.
REP83/199	County Mall 34	Issues of houses and flats. Lease service charge, ground rent. Government should have a cap. Re: affordable housing – service charges.
REP91/238	Town Hall 1	General discussion re: Homes England housing and Permitted Development.
REP93/242	Town Hall 3	Owns property on golf course and lives on Rusper Road opposite Ifield Brook Meadows. Questions of when and where development. Concern of road if dual carriageway. River – flooding already; development will only make it worse on Ifield Brook Meadows. Visual and connection with the countryside.
REP94/243	Town Hall 4	Ifield Society rep: Parish Boundary – against Homes England within the old Parish Boundary. Local Green Space designation – would like to be upgraded to a Local Nature Reserve? Conserving Ifield Conservation Area (including wider setting) Built-Up Area Boundary. Flood risk zones 2 and 3. Ramblents are effected – short walks.
REP113/324 (repeat)	Crawley Library 15	Do you know what's happening with Gatwick? You will have to build more houses if the airport expands.

Representor/ Representation Reference	Name/ Organisation	Comments
REP114/326	Crawley Library 16	Young families – but we have so many new apartments coming.
<b>Green Infrastructure &amp; Biodiversity</b>		
REP38/082 (repeat)	K2 Crawley 17	Tilgate Park – really special, needs recognition and protection.
REP49/117	Crawley Library 9	Water flower meadows?
REP75/191 (repeat)	County Mall 26	Needs: Keep and more access to natural green spaces and countryside (in Crawley Borough and land West of Ifield mentioned as well).
REP117/330 (repeat)	Crawley Library 19	Where is the stuff about types of appropriate trees and which trees we currently have in Crawley?
<b>Sustainable Design &amp; Construction</b>		
REP69/182 (repeated below Environmental Protection)	County Mall 20	Needs: Environmental – pressure on water supplies, drainage, flood defences etc.
REP110/321	Crawley Library 12	'Green Bin' Strategy not working – how much even picked up in Jan, Feb...
<b>Environmental Protection</b>		
REP69/182	County Mall 20	Needs: Environmental – pressure on water supplies, drainage, flood defences etc.
<b>Sustainable Transport</b>		
REP13/033	County Mall 6	Need bus gate into Kilnwood Vale. Poor wheelchair access along new footpath links into Kilnwood Vale.
REP17/037	County Mall 10	Need to improve potholes in particular. Langley Green, industrial estate Parking is narrow on roads due to increase in residential development.
REP18/040 (repeat)	County Mall 11	Too much bias towards flats rather than houses in the town centre – however, would make a far better environment and people would have less need to drive.
REP35/079	K2 Crawley 14	Crawley gridlocked.
REP48/110	Crawley Library 8	Parking on residential roads around Tilgate Park is a problem.
REP49/118	Crawley Library 9	Trams? Three Bridges Station improvements – could easily be made worse. Bus Station – terrible; can't believe it won a prize. Public transport needs sorting – evening bus service is poor.
REP63/168 (repeat)	County Mall 14	Infrastructure – roads.
REP64/170	County Mall 15	Congestion at Cheals Roundabout.

Representor/ Representation Reference	Name/ Organisation	Comments
REP64/171	County Mall 15	Support western relief road.
REP68/180	County Mall 19	Woodfield Road – speeding traffic.
REP69/183	County Mall 20	Needs: Infrastructure – transport, parking, access.
REP71/185	County Mall 21	Electric Charging. Make it less expensive to purchase cars.
REP80/196	County Mall 31	Buses are more convenient. Don't have to look for parking and drops you in the centre of town.
REP82/198	County Mall 33	Expensive public transport is encouraging people to drive – both in Crawley and between Crawley and London.
REP109/320	Crawley Library 11	Now a much less pedestrian-friendly town even than it used to be.
REP111/322	Crawley Library 13	Do the people that design these junctions come back to see how they work. Chaotic for cycle at Three Bridges!
REP114/325 (repeat)	Crawley Library 16	Not enough parking for library.
REP115/327	Crawley Library 17	Pedestrian access is terrible from Maidenbower to the station. Now the junction at Three Bridges is hugely improved and changed – BUT only for the cars!! CBC still not done what was said for a proper link for people living in Maidenbower.
REP116/328	Crawley Library 18	2/3 stops on the bus = £3; Oyster = £1.50 all routes. Why use the bus – too expensive.
REP116/329	Crawley Library 18	The link to Maidenbower – not maintained properly. Mud in drains. Maintenance just doesn't work.
REP118/331	Crawley Library 20	<u>Cycle</u> Town centre to Furnace Green <ul style="list-style-type: none"> <li>- safer and prettier</li> <li>- less car conflict</li> <li>- Straight up Southgate Avenue through park and trees to south of Hawth.</li> </ul>

GENERAL FEEDBACK				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
REP95/252	Questionnaire 5		I've lived in Crawley since 1959 (on and off) and sadly I'm not happy here anymore. I know people have to have places to live but like Prince Charles said there awful designs and a blot on our landscapes!	Noted
REP143/428	Indigo Planning on behalf of McKay Securities Plc.		<p><b>Summary</b></p> <p>Overall, the emerging policies need to be made simpler and more effective, taking care to minimise duplication of policy requirements to ensure the Plan fulfils its statutory obligation as a framework to support future development. Where identified, policies need to be amended to ensure they are sound and consistent with the national policy.</p> <p>We trust that you will take these representations into account in your progression of the Local Plan. In the meantime, should you have any queries regarding our representations, please do not hesitate to contact me or my colleague.</p>	Responses provided on specific comments in later sections.
REP150/450	Sport England	1.14	<p>Thank you for inviting Sport England to review the draft local plan. Sport England is current working with Crawley Borough Council (CBC) on the Playing Pitch Assessment and Indoor Sports Study which are mentioned in 1.14 page 11 of the draft local plan (DLP).</p> <p>The current documents which are referenced in the Background Studies and Evidence Base Documents (pages 209 – 213), i.e. The Crawley PPG 17 Open sport and Recreation Assessment (2008), <i>The Crawley Playing Pitch Strategy for Outdoor Sports (2005)</i> and the <i>Crawley Playing Pitch Assessment (2013)</i>, are in my opinion not sound. It is anticipated that the joint work we are doing with CDC will be completed in Spring 2020 and will ensure that Crawley has a sound evidence base for sport.</p> <p>An advantage of carrying out the work following the Sport England methodology is that it advises that annual reviews of the studies known as Stage E meetings which will assist in the monitoring and review.</p>	Noted. The Playing Pitch Strategy and Indoor and Outdoor Sports Facilities Strategy are underway, alongside the Open Space, Sport and Recreation Study. Sport England's involvement is welcomed.

<b>GENERAL FEEDBACK</b>				
<b>Representor/ Representation Reference</b>	<b>Name/ Organisation</b>	<b>Policy/ Para/ Page No.</b>	<b>Comments</b>	<b>CBC Response</b>
REP150/451	Sport England	Vision	Sport England supports Crawley's vision, in particular that <i>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.</i> The council is to be commended for making such a bold statement on the commitment of enhancing the area with sporting and leisure facilities.	Support noted
REP150/453	Sport England	Wellbeing & Communities page 33	Sport England supports the aims set out in the Wellbeing & Communities on page 33 of the DLP.	Support noted
REP152/461	Historic England		<p>Thank you for your email of 15 July 2019 inviting comments on the above consultation document.</p> <p>As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.</p> <p>There are many issues and matters in the consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets. We note that as an early stage in the formulation of a local plan the current document may be subject to significant change and consequently we consider it appropriate to limit our comments to more general matters; we will comment more specifically and in detail at later stages in the plan making process as appropriate. In this respect, you should not take the comments below as the definitive view of Historic England on the matters contained in the plan; they are provided for general guidance in the iterative process of preparing appropriate policies for the historic environment.</p>	Responses provided on specific comments in later sections.

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			The objective of the National Planning Policy Framework, inter alia, to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment (NPPF, Paragraphs 185); and contain strategic policies to deliver the conservation and enhancement of the historic environment (NPPF, Paragraph 20 d)). These underpin the purpose of the planning system to achieve sustainable development.	
REP153/477	Home Builders Federation		<p>Thank you for consulting the Home Builders Federation (HBF) on the Draft Crawley Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year. Having considered the draft local plan our key comments relate to:</p> <ul style="list-style-type: none"> <li>• The duty to co-operate and ensuring the Council's housing need are delivered</li> <li>• Making effective use of land</li> <li>• Inclusive design</li> <li>• Future housing mix</li> <li>• Affordable housing</li> <li>• The impact of the proposed policies on viability</li> <li>• Self-build housing</li> <li>• Sustainable design and construction</li> <li>• Car parking standards – electric vehicles</li> </ul> <p><b>Duty to co-operate and housing needs</b> The Local Plan makes provision for 4,806 additional dwellings over the plan period leaving an additional 6,475 new homes to be delivered elsewhere. This is a significant amount of homes and the Council will need to ensure, using the duty to co-operate, that it</p>	Further assessment of appropriate sites within Crawley has now identified a provision figure of 5,355 dwellings for the Plan period, although it recognises that there is an unmet need of 5,925 dwellings. Policy H1 states that the council will continue to work with its neighbouring authorities to explore opportunities and resolve constraints to meet this need in sustainable locations. The Duty to Cooperate is an ongoing process and councils in North West Sussex have a long history of joint working. However, CBC can only identify and plan for sites within its administrative boundary, although Policy H3g sets out criteria which will be used to inform discussions with neighbouring authorities and potential developers, and responses to emerging policies and planning applications in these areas. Policy H3g confirms the

GENERAL FEEDBACK				
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			identified in the submitted local plan where these homes will be delivered. We note that the Council cites a number of joint documents as evidence of past co-operation. Whilst we welcome this it will be important to now use this evidence as the basis for the preparation of shared policies that actually deliver the sites necessary to ensure needs are met in full.	preferred approach of the council is to work towards relevant cross-boundary and site-specific policies or Joint Area Action Plans where appropriate and possible.
REP153/483	Home Builders Federation		<p><b>Viability</b></p> <p>The NPPF 2019 at paragraphs 34 and 57 places significant emphasis on the testing of viability during the preparation of the Local Plan and the expectation that the cumulative impact of policies should not make the plan undeliverable and that decision makers can assume that planning applications that comply with all the policies in the local plan are viable. This position is reinforced by PPG which states at paragraph 10-002 that:</p> <p><i>“The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.”</i></p> <p>The importance to be placed on Plan stage viability has never been more critical. The Government considers that this emphasis on viability at the plan making stage will inevitably mean the need for negotiation on an application by application basis will be reduced and will only occur where there has been a change in circumstance. Given this focus on viability testing at the plan making stage the Government have set out in PPG have set out a recommended approach, including standardised inputs, that should be undertaken to support plan making. This provides a simple methodology to follow where a series of evidenced inputs steered by general parameters lead us to a residual land value where the range of local policy requirements are considered to be viable. If this is wrong or</p>	<p>The Local Plan Viability Study has been commissioned and will follow the advice set out in PPG. The comments raised in this response have been shared with the consultants undertaking the Study for their consideration. The Local Plan now includes a Planning Obligations Annex identifying the policies which have associated developer contributions, and any calculations for determining financial contributions.</p>



GENERAL FEEDBACK				
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			<p>some of the key inputs are inappropriate it simply undermines the entire plan making process casting doubt on the deliverability of chosen allocations, creating further opportunities for speculative proposals, prolonged debate at EIP, delay and poorer planning. We understand that the Council are still to undertake a viability assessment of the policies in this new local plan and we would therefore suggest that in preparing this evidence the following aspects are considered.</p> <p><i>Developer engagement</i> The Council will need to show that it has engaged with the development industry and landowners in line with paragraph 10-006 of Planning Practice Guidance to secure evidence on costs and values. Whilst we recognise that there is national data on such costs it will be important to understand the actual costs of developing in Crawley to ensure development will come forward as expected.</p> <p><i>Land value and benchmark land values</i> Given the limited scope for negotiation outlined in the NPPF 2019 it is important that a cautious approach is taken with regard to benchmark land values in the viability study. PPG sets out that the benchmark to land value should be established on the basis of the existing use value of land plus a premium to the landowner - referred to in PPG as EUV+. The premium should be established on the basis of the minimum return at which a reasonable landowner would be expected to sell their land. The difficulty in assessing what is considered a reasonable return to the landowner is an issue that has been faced by the development industry for a number of years and one that is not helped by the restraints placed on the development of land by successive Governments. The nature of the system itself severely constrains the availability of development land which, as it would in any market, leads to the value of this asset increasing. In such a market the price at which a reasonable landowner is willing to</p>	

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			<p>release their land will be high. The constraints in land supply faced by Crawley and its neighbour will mean that the level at which landowners are willing to sell their land will be higher and must be recognised in viability assessments considerations of land value. Our members therefore have significant concerns that if the additional costs placed on development by the local authority reduces the land value then land will not come forward for development rendering the plan undeliverable.</p> <p><i>Development costs</i> PPG recommends using the Building Cost Information Service (BCIS) data in relation to construction costs. It should be noted that the BCIS cost is only the cost of the house itself and is based upon a flat site with standard foundation, it does not account for all of the plot works nor any costs associated with more complex ground / gradient conditions. The Viability Assessment will therefore need to make an allowance of at least 20% of build costs to take account of more complex delivery and additional sites costs such as roads, drainage and services, parking, footpaths, and landscaping. Where the Council is requiring development at higher density the Council will need to ensure that these additional costs are reflected in the viability assessment. This is generally reflected in the higher build costs in BCIS for flatted development however where development requires under croft parking to meet any standards in the Local Plan this should be recognised in addition to the BCIS costs.</p> <p>PPG also requires viability assessments to reflect the implications of abnormal costs to development. However, the very nature of abnormal costs is that they are impossible to cost accurately prior to work commencing on site. It is important to acknowledge that such costs will generally occur to some extent on all sites and the Council</p>	

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			<p>must be willing to reduce any requirements where such costs are identified.</p> <p><i>Fees and finance</i> Our members suggest legal fees are in general 1.5% and marketing costs are between 3% and 5% depending on the strength of the market.</p> <p><i>Profit</i> Paragraph 10-018 of PPG suggests a total return of between 15% and 20%. Allowing for 40% affordable housing on major sites will mean that return on Gross Development Value is well below 20%. The HBF continues to recommend that a cautious approach is taken to profit, and that the developer return on market homes is increased to ensure that the return is closer to 20% of Gross Development Value. This ensures that the overall profit reflects the long-term risks faced by the house building industry in bringing land forward for development.</p> <p><i>Policy requirements</i> It will be important for the additional costs being placed on development as a result of the local plan review are thoroughly tested. One particular concern we have moving forward is with regard to net biodiversity gain. This has the potential to be a significant cost on all development and will need to be appropriately considered within the viability assessment. Other policy requirements that may be adopted such as the provision of charging points for electrical vehicles, self-build homes and sustainable design and construction will also need to be thoroughly tested.</p>	
REP154/487	Manor Royal BID		<b>This is the formal response of the Manor Royal Business Improvement District (BID) Company to Crawley Borough Council as part of the review of the Crawley Borough Local Plan (2020-2035).</b>	Responses provided on specific comments in later sections.

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			<p>The Manor Royal BID Company (MRBD Limited) was formed in June 2013 following the successful outcome of the BID ballot conducted in accordance with the Business Improvement Districts (BID) Regulations (2004). The purpose of MRBD is to represent and promote the interests of Manor Royal based companies and staff, with sole responsibility for managing and delivering the Manor Royal BID Business Plan. Further information about the Manor Royal BID can be found at Appendix C.</p> <p>The main focus of this response on behalf of the Manor Royal BID as part of this process with a particular focus on “Economic” policies as they impact on development and design in Manor Royal.</p> <p>It is recognised that housing supply and infrastructure are also important. In response to these issues extracts from the Manor Royal BID’s “Strategic Statement” is supplied in Appendix A.</p> <p><b><i>*Appendices Attached to Representation*</i></b></p>	
REP155/498	West Sussex County Council		<p><b>Introduction</b> This note sets out West Sussex County Council’s (WSCC) officer level response to the consultation on the Crawley Local Plan Review: Reg 18 Consultation and the Draft Infrastructure Plan. It highlights key issues and suggested changes to which Crawley Borough Council (CBC) is requested to give consideration. We will continue to work with CBC in the preparation of the Local Plan Review and the Infrastructure Delivery Plan regarding WSCC service requirements in order to mitigate planned development.</p>	Responses provided on specific comments in later sections.
REP155/499	West Sussex County Council		<p><b>Minerals and Waste (Planning)</b> A steady and adequate supply of minerals and the achievement of sustainable waste management can help to achieve a District or Borough Council’s goals in relation to the economy, housing, transport, communications, strategic infrastructure and the</p>	Noted. Local Plan paragraph 9.46 outlines that the existing minerals site (the railhead and associated storage and handling facilities) at Crawley Goods Yard is

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			<p>environment. Therefore, District and Borough Local Plans should recognise the importance of minerals and waste issues as relevant to the scope of their overall strategies.</p> <p>Please consider the location of sites in relation to minerals and waste sites and safeguarded uses. Consideration should be given to the Joint Minerals Local Plan, particularly Policy M9 (and associated guidance) on mineral safeguarding.</p> <p>Policy M9 of the West Sussex Joint Minerals Local Plan (2018) requires the safeguarding of existing minerals sites from non-mineral development, it also safeguards soft sand (including potential silica sand), sharp sand and gravel, brick-making clay, building stone resources and chalk reserves against sterilisation. The policy sets out proposals for non-mineral development within the Minerals Safeguarded Areas will not be permitted unless they meet the criteria set out. The implementation of M9 requires cooperation between West Sussex County Council and the local planning authorities. Applications for any development in a minerals safeguarding area should be the subject of consultation with West Sussex County Council.</p> <p>The West Sussex Waste Local Plan, 2014 (WLP) sets out the vision and strategic objectives for waste planning. Policy W10 of the WLP allocates sites to meet the identified shortfalls in transfers, recycling and recovery capacity set out in Policy W1 (Need for Waste Management). Policy W2 (Safeguarding Waste Management Sites and Infrastructure) seeks to safeguard existing waste sites and infrastructure for the achievement of sustainable waste management. A list of safeguarded waste sites is listed in the West Sussex Monitoring Report 2017/18 (<a href="http://www.westsussex.gov.uk/mwdf">www.westsussex.gov.uk/mwdf</a>).</p>	<p>safeguarded from other forms of development. Crawley Goods Yard, including its 250 metre buffer, is shown on the Local Plan Map, with a cross reference to the West Sussex Minerals Local Plan 2018.</p>
REP157/531	Department for Education		Consultation under Regulation 18 of Town and Country Planning (Local Planning) (England) Regulations 2012	Policy IN1 has been amended to refer specifically to seeking

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			<p>Submission of the Department for Education</p> <p>1. The Department for Education (DfE) welcomes the opportunity to contribute to the development of planning policy at the local level.</p> <p>2. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and DfE is the delivery body for many of these, rather than local education authorities. However, local education authorities still retain the statutory responsibility to ensure sufficient school places, including those at sixth form, and have a key role in securing contributions from development to new education infrastructure. In this context, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. We have published guidance on education provision in garden communities and securing developer contributions for education, at <a href="https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth">https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth</a>. You will also be aware of the corresponding additions to Planning Practice Guidance on planning obligations, viability and safe and healthy communities.</p> <p>3. We would like to offer the following comments in response to the above consultation document.</p> <p>General Comments</p> <p>4. DfE notes that the draft Local Plan anticipates an annual housing target of 451 dwellings per year until 2024/25 and then 255 dwellings per year until the end of the plan period in 2035. This will place additional pressure on social infrastructure such as education facilities. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements.</p>	<p>planning obligations towards specific Education schemes related to development. The Planning Obligations Annex sets out approaches for pursuing these contributions. The Borough Council welcomes the support of the DfE and WSCC in identifying and costing appropriate schemes to secure this funding to help meet the demand for new school places.</p> <p>Policy H1 Housing Delivery Trajectory has been amended, with 500 dpa now anticipated 2020-25; 440 dpa 2025-30; and 117 dpa 2030-35.</p> <p>The Adopted Local Plan Infrastructure Plan established that additional secondary school capacity was required, and that it could be met through the expansion of existing secondary schools within the borough. However, since then a school promoter secured funding for a new school in Crawley and instead of extensions, therefore, site options for a new secondary school in Crawley have been exhaustively</p>

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			<p>5. Please note that there are two routes available for establishing a new school. Firstly, a local authority may seek proposals from new school proposers (academy trusts) to establish a free school, after which the Regional Schools Commissioner will select the successful trust. Under this 'local authority presumption route' the local authority is responsible for finding the site, providing the capital and managing the build process. Secondly, school proposers can apply directly to DfE during an application round or 'wave' to set up a free school. The local authority is less involved in this route but may support groups in pre-opening and/or provide a site. Either of these routes can be used to deliver schools on land that has been provided as a developer contribution. DfE has published further general information on opening free schools<sup>1</sup> as well as specifically in relation to opening free schools in garden communities.</p> <p>6. The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 94).</p> <p>7. In order to comply with this national policy, the Local Plan should safeguard land for the provision of new schools and school expansions where appropriate. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary, in accordance with Planning Practice Guidance and DfE guidance on securing developer contributions for education.</p> <p>8. Crawley Borough Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on</p>	<p>considered by CBC, WSCC, LocatED and the DfE over the past two years. Given the constrained land supply in the borough, no site has been found to be appropriate to all parties. The Local Plan does not, therefore, propose specific allocations for educational uses, but Policy IN2 has been amended to state that schools may be an acceptable alternative use on sites allocated for uses including housing, subject to relevant requirements being met.</p> <p>Education is one of the strategic matters identified in the Statement of Common Ground being prepared through the Duty to Cooperate, and Policy H3g states criteria necessary for development of urban extensions adjacent to Crawley to be supported, including if the development helps meet unmet needs of Crawley, including for Education.</p>

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			<p>Planning for Schools Development4 (2011) which sets out the government's commitment to support the development of state-funded schools and their delivery through the planning system.</p> <p>9. In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 24-27), DfE encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. Please add DfE to your list of relevant organisations with which you engage in preparation of the plan.</p> <p>10. Where there is significant cross-boundary movement of school pupils between a borough and adjoining areas, DfE recommends that the Council covers this matter and progress in cooperating to address it as part of its Statement of Common Ground. This should be regularly updated during the plan-making process to reflect emerging agreements between participating authorities and the Council's own plan-making progress.</p>	
REP157/532	Department for Education	Para. 1.20 – 1.21	<p>11. DfE welcomes reference within the plan's vision to the role of education provision in creating stronger communities. Paragraph 1.20 refers to collaboration between Crawley Borough Council and other authorities and infrastructure providers to meet forecast demands. You will be aware of two live free school projects in Crawley, being delivered directly by DfE through the 'wave' approval route explained above in paragraph 5, rather than West Sussex County Council. These projects include:</p> <ul style="list-style-type: none"> <li>• Gatwick Free School – which is open on a site at 23 Gatwick Road and in the process of securing permanent planning permission; and</li> <li>• Forge Wood High School – which does not yet have an identified site.</li> </ul>	The DfE's continued engagement with WSCC and CBC is welcomed.



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			<p>12. Due to these projects, it would be helpful to include DfE in your discussions about infrastructure provision, involving us in the position statements the plan refers to in paragraph 1.21. There should be collaborative working between DfE, Crawley Borough Council and West Sussex County Council on education provision to meet the needs of the borough.</p>	
REP157/533	Department for Education	Para. 2.21	<p>13. Paragraph 2.21 of the draft Local Plan recognises the unusual population profile in Crawley, with around two thirds of the population under the age of 45 and forecast demographic change leading to increased demand for educational facilities. However, there are no proposals in the plan to allocate sites for education, and the draft Infrastructure Delivery Plan (IDP) provides very little detail on school provision to meet demand from anticipated housing growth. The lack of detail on school provision in the current Local Plan is one of the reasons why it has been difficult to successfully progress schemes for new education provision in the Crawley area.</p> <p>14. For the plan to be effective and positively prepared, the IDP should identify which developments the planned school provision will serve (including cumulative or windfall developments where appropriate), the costs of provision, the predicted timescales in line with the housing trajectory, and the funding sources for each identified education project. The IDP should be prepared in conjunction with an updated viability assessment to ensure that realistic education costs are factored into any decisions about the amount and type of developer contributions that will be required.</p> <p>15. Viability assessment should inform options analysis and site selection, with site typologies reflecting the type and size of developments that are envisaged in the borough. This enables an informed judgement about which developments would be able to deliver the range of infrastructure required, including schools, leading to policy requirements that are fair, realistic and evidence-</p>	<p>The Adopted Local Plan Infrastructure Plan established that additional secondary school capacity was required, and that it could be met through the expansion of existing secondary schools within the borough. However, since then a school promoter secured funding for a new school in Crawley and instead of extensions, therefore, site options for a new secondary school in Crawley have been exhaustively considered by CBC, WSCC, LocatED and the DfE over the past two years. Given the constrained land supply in the borough, no site has been found to be appropriate to all parties. The Local Plan does not, therefore, propose specific allocations for educational uses, but Policy IN2 has been amended to state that schools may be an acceptable alternative use on sites allocated for uses including</p>

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			<p>based. In accordance with Planning Practice Guidance, there should be an initial assumption that applicable developments will provide both land and funding for the construction of new schools. The total cumulative cost of complying with all relevant policies should not undermine deliverability of the plan, so it is important that anticipated education needs and costs of provision are incorporated at the outset, to inform local decisions about site selection and infrastructure priorities.</p> <p>16. Site allocations (for standalone school sites or schools within housing developments) should also seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicate this might be necessary.</p> <p>17. While it is important to provide this clarity and certainty to developers and the communities affected by development, retaining a degree of flexibility about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. DfE therefore recommends the Council consider highlighting in the next version of the Local Plan that:</p> <ul style="list-style-type: none"> <li>- specific requirements for developer contributions to increasing capacity of existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that</li> <li>- requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.</li> </ul>	<p>housing, subject to relevant requirements being met.</p> <p>Policy IN1 has been amended to refer specifically to seeking planning obligations towards specific Education schemes related to development. The Planning Obligations Annex sets out approaches for pursuing these contributions. The Borough Council welcomes the support of the DfE and WSCC in identifying and costing appropriate schemes to secure this funding to help meet the demand for new school places.</p> <p>The Viability Assessment for the Local Plan, which will include assessment of all the Plan policies, and the Community Infrastructure Levy, will take account of required contributions for education.</p>

<b>GENERAL FEEDBACK</b>				
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REP162/567	Sussex Ornithological Society		<p><u>Appendix 1</u> <u>SOS concerns about potential housing overflow into The High Weald AONB</u></p> <p>The Sussex Ornithological Society is very concerned to note that the map accompanying paragraph 2.32 of the draft Crawley Local Plan appears to open up the possibility of further development in or close to the woodland and farmland from Bensonhill and Highbeeches Forest in the west to Worthlodge Forest in the east in order to accommodate housing which Crawley Borough has to build, but which they feel cannot be constructed within the Borough boundaries.</p> <p>This area lies within the High Weald Area of Outstanding Natural Beauty (AONB). Although it is protected both by policies LC5 and LC6 of the Crawley Local Plan and by policy DP16 of the Mid-Sussex District Plan 2014-2031, development has already been allowed in this part of the AONB at Parish Lane, Pease Pottage.</p> <p>The SOS is of the view that in order to maintain already depleted levels of bio-diversity, any further development of land in the area inside the dashed line on the map at 2.32 of the draft Plan and lying within the arc bounded to the north by the minor road running from Turners Hill to Crawley via Compasses Corner, and to the west and north-west by the M23 and A23 should not be contemplated.</p> <p>Although much of the woodland is private and bird survey work has been constrained, fieldwork from public rights of way and through permission to enter private land has demonstrated that the mixed deciduous and coniferous woodlands in the area are home to an unusually rich variety of birds, comparable in diversity and value to Ashdown Forest and other protected landscapes. The diagrammatic map in Figure 1 below shows the number of species recorded by 2km squares (tetrads) using the Ordnance Survey grid reference</p>	<p>Paragraph 2.32 of the Local Plan explains that unmet needs arising from Crawley may be accommodated in urban extensions to Crawley, although this will be assessed as part of the consideration of the most sustainable development options as the Local Plans of neighbouring areas are prepared and is not determined by the Crawley Borough Local Plan. Fig 2 identifies already planned development beyond the borough boundary, including the site at Pease Pottage which is under construction.</p>

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			<p>system. It will be seen that in five of these tetrads 70 to 90 bird species have been recorded in the last ten years.</p> <p>Sussex Ornithological Society - Figure 1</p> <p>CRAWLEY OVERSPEL AIBA - NUMBER SPECIES RECORDED</p> <p>(In figures 1 and 2 the M23/A23 is diagrammatically shown as a red line as its route is close to the grid references shown)</p> <p>Figure 2 shows how many of the species in Fig 1 are Red-listed, Schedule 1 or Section 41 species, and again the same five tetrads contain a high proportion of these uncommon or vulnerable species (see notes below for an explanation of these conservation designations).</p> <p>To give some detail: these forests contain three or more breeding pairs of Goshawk <i>Accipiter gentilis</i> and two of Honey-buzzard <i>Pernis apivoru</i>, which are both very scarce and local breeding species in Sussex, Goshawk with an estimated 18 breeding pairs in 2019 and Honey-buzzard with seven breeding pairs in 2019. Both are Schedule 1 species and Honey-buzzard is also an amber-listed species. These birds are susceptible to disturbance and require large areas of mixed forest and farmland in which to breed.</p>	

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			<p><small>Sussex Ornithological Society - Figure 2</small></p> <p><small>CRAWLEY OVERSPILL AREA - NUMBER OF RED LISTED/SCHEDULE 1/SCHEDULE 41 SPECIES RECORDED</small></p> <p>Also of particular concern is the presence in these forests of Lesser Spotted Woodpecker <i>Dryobates minor</i> (Schedule 41 and red-listed). This species has declined very severely in recent decades, and locally might be in danger of extinction.</p> <p>Other breeding species of concern include Woodcock <i>Scolopax rusticola</i> (a severely declining red-listed species), Common Redstart <i>Phoenicurus phoenicurus</i> (amber-listed and here at the highest densities in Sussex outside Ashdown Forest), Spotted Flycatcher <i>Muscicapa striata</i> (Section 41 and red-listed), Hobby <i>Falco Subbuteo</i> (Schedule 1), Common Crossbill <i>Loxia curvirostra</i> (Schedule 1) and Yellowhammer <i>Emberiza citrinella</i> (Section 41 and red-listed). The red-listed Grey Wagtail <i>Motacilla cinerea</i> breeds along woodland streams and the severely declining Cuckoo <i>Cuculus canorus</i> and Marsh Tit <i>Poecile palustris</i> (both Section 41 and red-listed) also breed. Woodlark <i>Lullula arborea</i> (Schedule 1 and Section 41) sometimes breeds, depending on the stage of management of plantations. Tree Pipit <i>Anthus trivialis</i> (Section 41 and red-listed) has occurred and may breed. The adjacent farmland is of value to both breeding and migrant birds, including breeding Skylarks <i>Alauda arvensis</i> (Section 41 and red-listed). In winter the forests are an important feeding and/or roosting area for finches, and can hold</p>	

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			<p>three figure flocks of Brambling <i>Fringilla montifringilla</i>, Chaffinch <i>Fringilla coelebs</i> and the red-listed Lesser Redpoll <i>Acanthis cabaret</i>.</p> <p><i>Notes on conservation designations</i></p> <p>1. The UK's leading bird conservation organisations have worked together to review the status of birds in the UK, Channel Islands and Isle of Man and the latest results are published in Birds of Conservation Concern 4. The bird species that breed or overwinter were assessed against a set of objective criteria to be placed on the Green, Amber or Red list. Green-listed species are of least conservation concern, amber-listed species are of medium conservation concern and red-listed species are of high conservation concern.</p> <p>2. Schedule 1 of The Wildlife and Countryside Act 1981 contains a list of 83 species of birds which enjoy extra protection. It is an offence to intentionally or recklessly disturb Schedule 1 bird species at, on or near an 'active nest'.</p> <p>3. Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 lists 949 species of all taxa (including 49 species of bird) whose conservation is of principal importance for the well-being of biodiversity in England. Section 41 species are the only ones considered under the criteria for designating SSSI's and there must also be evidence of the presence of some Section 41 species when designating Sussex LWS's.</p>	
REP172/593	Vail Williams on behalf of Jersey Farm landowners		<p><b>Response on Behalf of Land Consortium at Land Adjacent to Jersey Farm for Crawley Borough Council Local Plan Review 2035</b></p> <p>We are writing on behalf of our clients Ardmore Ltd and their informal land consortium of 4 adjacent land owners, in regard to land that we believe should be considered available for development to the North of the Borough, adjacent to Manor Royal.</p>	Responses provided on specific comments in later sections

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			<p>There are nine sites and five landowners which all wish to act as signatories to this letter and we are appointed by them under the lead member Ardmore Limited.</p> <p>The landowners are as follows:</p> <table border="1"> <thead> <tr> <th>Site no.</th> <th>Land ownership</th> <th>Site address</th> <th>Site area</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Ardmore</td> <td>Land at Jersey Farm (A)</td> <td>0.59ha</td> </tr> <tr> <td>2</td> <td>Ardmore</td> <td>Land at Jersey Farm (B)</td> <td>2.18ha</td> </tr> <tr> <td>3</td> <td>Ardmore</td> <td>Land at Jersey Farm (C)</td> <td>8.77ha</td> </tr> <tr> <td>4</td> <td>Willmott</td> <td>Land at Little Dell Farm (A)</td> <td>3.98ha</td> </tr> <tr> <td>5</td> <td>Ohm and Hill</td> <td>Land at Little Dell Farm (B)</td> <td>1.94ha</td> </tr> <tr> <td>6</td> <td>Ardmore</td> <td>Land at Little Dell Farm (C)</td> <td>0.26ha</td> </tr> <tr> <td>7</td> <td>Maxwell</td> <td>Land at Poles Lane (A)</td> <td>1.43ha</td> </tr> <tr> <td>8</td> <td>Rixon and Crook</td> <td>Land at Poles Lane (B)</td> <td>0.68ha</td> </tr> <tr> <td>9</td> <td>Ardmore</td> <td>Land at Spikemead Farm</td> <td>3.67ha</td> </tr> </tbody> </table> <p>The attached Map identifies the 9 sites considered as part of this wider land assembly, and for some sites relates to land that is currently identified as being safeguarded for a second runway at Gatwick Airport.</p> <p>In order to further support these representations, Vail Williams have attended the Developers Forum on Thursday 5th September 2019 and the Local Economic Action Group meeting on Wednesday 11th September 2019. Our attendance to these events has helped inform our representations as cited in this letter.</p> <p>In order to assist you with our detailed representations, our response reflects the structure of the document proposed by the Local Plan in its consultation draft. Our main areas of comment will understandably be relating to the context, setting and landscape character of the land north of Manor Royal, as well as Gatwick safeguarding and the Economic Growth policies.</p>	Site no.	Land ownership	Site address	Site area	1	Ardmore	Land at Jersey Farm (A)	0.59ha	2	Ardmore	Land at Jersey Farm (B)	2.18ha	3	Ardmore	Land at Jersey Farm (C)	8.77ha	4	Willmott	Land at Little Dell Farm (A)	3.98ha	5	Ohm and Hill	Land at Little Dell Farm (B)	1.94ha	6	Ardmore	Land at Little Dell Farm (C)	0.26ha	7	Maxwell	Land at Poles Lane (A)	1.43ha	8	Rixon and Crook	Land at Poles Lane (B)	0.68ha	9	Ardmore	Land at Spikemead Farm	3.67ha	
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REP172/604	Vail Williams on behalf of Jersey Farm landowners		<p><b>Conclusions</b></p> <p>We are grateful for the opportunity to comment on the Regulation 18 Issues and Options Consultation and would seek further to engage directly with the Council in regard to the key matters regarding the</p>	Responses provided on specific comments in later sections																																								

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			<p>safeguarded land, the Crawley Western Relief Road and general economic policies.</p> <p>To assist in the assessment of the Consortium we have attached a map showing all nine landowners and the land boundaries that have also been submitted to your call for sites. In addition, we have submitted a plan that identifies the new planning application submitted to the Council week commencing 9th September 2019 and how it would be aligned and affected by the potential western relief road. Should have any further questions please do not hesitate to contact me.</p>	
REP172/605	Vail Williams on behalf of Surrey County Council		<p><b>Response on behalf of Surrey County Council as local plan representation to Crawley Borough Council Local Plan Review 2035</b></p> <p>We are writing on behalf of our clients Surrey County Council in regard to their site and development opportunities at Nexus Parcel 3, 2-3 Gatwick Road, Crawley.</p> <p>We would like to make the following Local Plan representations in regards to economic growth policies in the emerging local plan, as proposed under the 2019 Local Plan Consultation Regulation 18, and how this would impact on the future development and delivery of any future development on Parcel 3.</p> <p>As you will be aware, planning permission was granted for Parcels 1 and 2 following a number of hybrid outline and approval of reserved matter applications, as well as MMA and NMA applications.</p> <p>Both of these sites are now occupied and operating with associated landscaping and car parking operational.</p> <p>Parcel 3 currently remains undeveloped although Surrey County Council are actively looking to bring forward development on this site within the short term.</p>	Responses provided on specific comments in later sections



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			<p>In order to further support these representations, Vail Williams have attended the Developers Forum on Thursday 5th September 2019 and the Local Economic Action Group meeting on Wednesday 11th September 2019, and these have helped inform our representations as cited in this letter.</p> <p>In order to assist, our response reflects the structure proposed by the Local Plan in its consultation draft, but our main areas of comment relate to the context, setting and character of the land north of Manor Royal, Gatwick safeguarding and the employment policies. Our detailed comments are as follows:</p>	
REP174/613	Gatwick Airport Limited		<p><b>Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012.</b>  <b>Crawley 2035 Local Plan Review - Early Engagement Consultation (Regulation 18).</b>  <b>Response of Gatwick Airport Limited.</b></p> <p>Gatwick Airport Limited (GAL) welcomes the opportunity to comment on the Draft Crawley Borough Local Plan 2020 – 2035 “Crawley 2035” June 2019 (‘the draft Plan’) as part of the current Regulation 18 early engagement consultation.</p> <p>GAL provides its initial comments on the draft Plan’s policies and supporting text as appropriate at this early stage in the public engagement process. GAL’s submission also provides a response to a number of the questions contained within various chapters of the draft Plan which we consider to be of specific relevance and importance to the operation of the airport, development management and land use planning aspects.</p> <p>Gatwick Airport is the UK’s second largest airport and the most efficient single-runway airport in the world. It serves more than 230 destinations in over 70 countries with more than 46 million passengers a year on domestic, short and long-haul point-to-point</p>	

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			<p>services. These levels of operation are predicted to grow irrespective of the development of an additional runway to the south of the airport. Gatwick is a major economic driver for the Gatwick Diamond and therefore has a significant influence upon not only Crawley borough and the town, but also the wider London and South East Region. Furthermore, Gatwick is the single largest local employer generating over 24,000 on-airport jobs and a further 12,000 jobs through related activities. The airport has excellent public transport links and provides good levels of connectivity for residents and workers in the Borough and surrounding areas.</p> <p>This response provides GAL's overarching views of the proposed draft Plan and considers the soundness of specific planning policies proposed within the draft Plan. The response also provides GAL's recommendations for specific amendments to the proposed text of the draft Plan's policies and supporting text.</p> <p>In preparing this response, we have sought to provide the relevant level of reasoning and justification for the amendments GAL seeks to the draft Plan and which are appropriate to this Regulation 18 stage of the public consultation.</p> <p>In responding to the draft plan, GAL acknowledges that local plans are required to be sufficiently flexible to be able to accommodate needs not anticipated in the Plan and to allow a rapid response to changes in circumstances (NPPF paragraph 11(a)). The draft Plan addresses the existing airport operation in its single runway and two terminal configuration. However it is essential that the draft Plan is prepared taking into account the sustainable growth of the airport by making best use of its existing runways and infrastructure over the Plan period, in accordance with national policy. The GAL Master Plan published in final form in July 2019, after a period of public consultation, is an important consideration and confirms that GAL</p>	<p>Policy GAT1 continues to support the growth of the airport on a single runway, but the Council has not yet seen evidence to determine whether or not the use of the northern runway, currently being</p>

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			<p>intend to bring forward a Development Consent Order application which will enable it to routinely use its existing standby / emergency runway for everyday operations. The draft Plan should anticipate this project coming forward and provide the necessary framework in which ancillary development may be supported.</p> <p>Furthermore, with the potential for an additional wide-spaced runway (to the south) and associated infrastructure to come forward at Gatwick during the lifetime of the Plan period (to 2035) the draft Plan should demonstrate that it is sufficiently flexible to be able to respond to the changes that will arise should this occur. This forms a significant material consideration that has direct implications for the draft Plan. (NPPF para 22). GAL hold the position that the Local Plan 2035 would need to be subject to a policy review following any subsequent policy announcement by Government on airport capacity triggered during the Local Plan 2035 horizon. We consider such an approach is a fundamental requirement to ensure that the flexibility required by the NPPF is provided and that the Plan is sound. GAL recognise that the draft Plan identifies that there will some form of review of the Local Plan undertaken again in 2025 in line with the NPPF (para 33) requirement for a cyclical 5 yearly review period for Local Plans.</p> <p>GAL's representation and comments on the draft Plan relate to the promotion of strategic policies that will support the further sustainable growth of the airport through the optimization of its current assets and continue to safeguard land around the airport in line with current Government policy.</p> <p>GAL is keen to engage further with the CBC Forward Plans Team in the next stage of plan preparation. We look forward to discussing our representations in advance of the preparation of the Regulation 19 consultation.</p>	<p>considered through the DCO process, could be supported in terms of its impact on the local environment and infrastructure. The policy therefore highlights the issues which the DCO process should address.</p> <p>Response regarding safeguarding covered under Policy GAT2 below.</p>

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			<p><b>Introduction</b></p> <p>This response is set out as follows.</p> <p>Firstly, the response covers 'Chapter 10: Gatwick Airport', which is the chapter of most relevance to Gatwick Airport Ltd. This section follows the structure of Chapter 10 as drafted and covers our detailed comments on the following:</p> <ul style="list-style-type: none"> <li>• Gatwick Airport Chapter 10 Consultation Questions and introductory text;</li> <li>• Policies GAT1, GAT2, GAT3 and GAT4 including specific questions relating to each policy and amendments suggested to the wording of those policies</li> <li>• The 'reasoned justification' text for each policy and any amendments suggested.</li> </ul> <p>For ease and clarity, where appropriate, we have provided a track change of the amendments being sought.</p> <p>Secondly, the response then covers each Policy as follows:</p> <p>Policy</p> <p>GAT1: Development of the Airport with a Single Runway</p> <p>GAT2: Safeguarded Land</p> <p>GAT3: Gatwick Airport Related Parking</p> <p>GAT4: Employment Uses at Gatwick</p> <p>CD7: Aerodrome Safeguarding</p> <p>CD8 Advertisements</p> <p>EP4: Noise Sensitive Development (and Noise Annex)</p> <p>CD4: Effective Use of Land</p> <p>EC1: Sustainable Economic Growth</p> <p>EC2: Economic Growth in Main Employment Areas</p> <p>EC4: Visitor Accommodation</p> <p>H2: Key Housing Sites</p> <p>H3e: Upward Extensions</p> <p>H8 : Gypsy, Traveller &amp; Travelling Showpeople Sites</p>	<p>Responses provided on specific comments in later sections.</p>

GENERAL FEEDBACK				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			IN1: Infrastructure Provision IN2: The Location and Provision of New Infrastructure ST1: Development and the Requirements for Sustainable Transport ST3: Improving Rail Stations ST4: Safeguarding a Search Corridor for Crawley Western Relief Road	
REP175/637	Savills on behalf of St. Catherine's Hospice		<p><b>1. Executive Summary</b></p> <p>1.1. This representation is made to the Crawley Borough Council (CBC) Regulation 18 Consultation on the Emerging Local Plan. The consultation is open between 15 July 2019 and 16 September 2019.</p> <p>1.2. This representation is submitted on behalf of St Catherine's Hospice and provides commentary on key aspects of the consultation and evidence base as applicable to the land and buildings at St Catherine's Hospice, Malthouse Road ("the site"), which is being actively promoted to the Local Plan for C3 or C2 development for circa 70 dwellings/ 80-bed care facility (use class C3/C2). The location plan for the site is included at Appendix 1.</p> <p>1.3. The site currently comprises St Catherine's Hospice, a facility for palliative health care. St Catherine's services are to be provided in an alternative enhanced facility, roughly 2.5 miles from the existing site, in neighbouring Mid Sussex (planning permission for the new facility is granted under Ref: DM/15/4711). The provisioning of these services has rendered the existing buildings at Malthouse Road unnecessary for St Catherine's Hospice and provides the opportunity for redevelopment on the site.</p> <p>1.4. The housing need in Crawley is set at 11,200 net additional dwellings over the plan period but CBC has acknowledged that it cannot meet this need within the Borough. Similarly, CBC were unable to meet its own housing need within the adopted Local Plan,</p>	St Catherine's Hospice site has been allocated in the submission Local Plan as a Key Housing site for Older People for Use Class C3 designed specifically for older people or residential rooms Use Class C2 in order to help meet these specific needs identified in the Strategic Housing Market Assessment, and to better reflect the constraints of the site.

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			<p>with both Horsham and Mid Sussex District Councils contributing to meeting CBC's unmet need.</p> <p>1.5. The relocation of St Catherine's Hospice to Pease Pottage presents the opportunity for the essential redevelopment of a significantly under-developed and inefficient site.</p> <p>1.6. Once St Catherine's has moved to its new facility in Pease Pottage (anticipated early 2022), the Malthouse Road site will be available for redevelopment. This echoes with the adoption of CBC's Local Plan Review.</p> <p>1.7. Development at St Catherine's will provide multiple benefits, notably:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Reusing brownfield land;</li> <li><input type="checkbox"/> Providing crucial housing in a sustainable town-centre location;</li> <li><input type="checkbox"/> Enhancing the neighbouring Malthouse Road Conservation Area through the replacement of ungainly buildings with sympathetically designed new builds.</li> </ul> <p>1.8. Within this representation comments are provided on CBC's Local Plan review. The conclusion is drawn that the site at St Catherine's Hospice should be allocated in the emerging Local Plan for residential development capable of delivering residential dwellings (use class C3) or residential beds, for use as a residential care home or nursing home (use class C2). This flexibility will enable residential dwellings/elderly person accommodation to come forward.</p> <p><b>2. Background to The Site</b> <b>The Site</b></p> <p>2.1. The 0.73 Ha site is situated on the southern side of Malthouse Road Crawley, which is a predominantly residential road located</p>	

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			<p>approximately 0.7 miles south of Crawley town centre and railway station.</p> <p>2.2. The site comprises four existing buildings, including the Main Hospice care building, the Turner Centre, the Awebrook building and the Mynthurst building. The Main Hospice is situated on northern part of the site fronting onto Malthouse Road. The Turner Centre is located to the rear of the site and adjacent the southern boundary. The Awbrook building is located in the centre of the site, immediately east of the Main Hospice building. The Mynthurst building is located on the northern part of the site and fronts onto Malthouse Road (No. 128 Malthouse Road).</p> <p>2.3. Vehicular and pedestrian access is provided via Malthouse Road, which abuts the northern boundary of the site.</p> <p>2.4. Immediately south of the main hospice building is a larger building accommodating an extra care residential scheme. This is a reasonably large part 2, 3 and 4-storey building, known as Hogshill Gardens. To the west of the hospice building are No.s 60, 62 and 64 Brighton Road, these are 2-2.5 storeys in height.</p> <p>2.5. The eastern boundary of the site (and No. 128) intersects Malthouse Road Conservation Area, and Goffs Park Road Area of Special Local Character is located within 200m of the Hospice, future development will be designed sympathetically to preserve the Conservation Area.</p> <p>2.6. Malthouse Road predominantly comprises semi-detached, two storey, Edwardian houses which has largely influenced the character of the road. At present, the general scale, massing and design of St Catherine's Hospice does not respond well to the local vernacular. Similarly with Brighton Road and the neighbouring Goff Park Road, which are both celebrated as part of Crawley's Heritage.</p>	

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			<p>2.7. There are a number of mature trees along the boundary of the site, these will to be assessed as part of an arboriculture survey/tree survey to inform any future development schemes. The neighbouring property, Hogshill Gardens on Brighton Road is known to have several trees protected by Tree Preservation Orders (TPO).</p> <p>2.8. The site is in Flood Risk Zone 1, and therefore has the lowest chance of fluvial flooding, therefore flooding is not a constraint on the site.</p> <p>2.9. A preliminary ecology survey has confirmed that the habitats on the site are "<i>predominately common and widespread throughout the local area.....Buildings, hardstanding, amenity grassland and introduced shrubs were dominant on site, which are of limited value</i>" (paragraph 6.2).</p> <p><b>The Proposals</b></p> <p>2.10. As set out above the aspiration for the site is to provide a comprehensive development, comprising either: a care facility of approximately 80 beds, for use as a residential care home or nursing home (use class C2); or, residential development of circa 70 dwellings (use class C3). At present there is no set decision on the layout of development. St Catherine's would request flexibility is built into any allocation/policy to allow residential dwellings/elderly person accommodation to come forward on the site.</p> <p>2.11. Whilst there are some constraints on the site, these are not considered significant enough to negatively affect the opportunities for a comprehensive development to come forward. It is considered that there are numerous opportunities across the site, owing to the existing access points and close proximity to the train station and town centre.</p>	



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			<p>2.12. Crawley is considerably constrained due to the limited land available in the Borough, therefore it is of paramount importance to maximise the development potential within, and close to, the Town Centre. The redevelopment of the site will increase the density of housing provided on the site, whilst enhancing the setting of the neighbouring Conservation Area.</p> <p>Relocation of St Catherine's Hospice Facilities</p> <p>2.13. St Catherine's Hospice is currently in the process of developing an enhanced care facility in Pease Pottage, two miles south of the Malthouse Road site. The relocation of St Catherine's Hospice will considerably improve the level of care offered at St Catherine's, providing a modernised and bespoke enhanced palliative care facility.</p> <p>2.14. As the hospice will be relocated just outside of the Borough, the hospice will still provide services to Crawley residents and therefore the move will not affect the care provisions available in the area.</p> <p><b>3. The Local Plan Review</b></p> <p>3.1. These representations specifically address the strategic policies as well as those set out in Section 4 (Character and Design); Section 6 (Heritage); Section 8 (Infrastructure Provision); and Section 12 (Housing). Whilst some comments relate to the broader interpretation of policy, they are primarily focused on sections relevant to the site.</p> <p>3.2. The positive approach towards sustainable development, set out in Strategic Policy SD1 is fully supported and reflects the heart of the National Planning Policy Framework (2019) (NPPF), as set out in paragraph 10.</p>	

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			3.3. St Catherine's welcomes the prospect of working in partnership with the Council to provide a sustainable new residential development in the heart of Crawley.	
REP178/671	FirstPlan on behalf of Crawley Goods Yard Operators		<p><b>RESPONSE ON BEHALF OF CRAWLEY GOODS YARD OPERATORS DRAFT CRAWLEY 2035 LOCAL PLAN REGULATION 18 CONSULTATION</b></p> <p>Firstplan are instructed by Aggregate Industries UK Ltd (AI), Cemex UK Operations Ltd (Cemex), Day Group Ltd (Days) and Brett Group to provide the following response to the regulation 18 consultation on the draft Crawley Borough Local Plan 2020 – 2035.</p> <p><b>Relevant Background Information</b></p> <p>As the Borough Council are fully aware, our clients jointly operate Crawley Goods Yard an established rail fed aggregates depot and safeguarded rail head. The goods yard has the capacity to handle a million tonnes of aggregate a year with the potential for expansion in the future. The site supports additional key minerals infrastructure and related development including two concrete batching plants, an asphalt plant and construction and demolition waste recycling plant.</p> <p>The operators of the Goods Yard were fully involved in the last Local Plan process which led to specific wording in the adopted version of Policy H2 regarding the Tinsley Lane site. This requires that development on this site must be "<i>planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent safeguarded minerals site</i>".</p> <p>The operators were subsequently also involved in providing comments in response to consultation undertaken in the preparation of the Tinsley Lane Development Brief (Adopted April 2017). This now includes at Section 7 guidance on Noise.</p> <p><b>Comments on the Draft Plan</b></p>	Support noted.

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			Crawley Goods Yard is illustrated on the draft Proposals Map as a 'Safeguarded Railhead' with reference made to the WSCC & SDNPA Joint Minerals Local Plan 2018 within the legend. This approach is strongly supported as it signposts people accessing the Local Plan to this important designation within the Joint Minerals Local Plan and therefore raises awareness of the need to take our clients' site into account. This approach was taken in the adopted Proposals Map and found sound by the previous Inspector.	
REP184/706	Sussex Wildlife Trust	Vision	<p>The Sussex Wildlife Trust (SWT) recognises the importance of a plan led system as opposed to a developer led process and supports Crawley Borough Council's (CBC) desire to produce a cohesive Local Plan. Therefore we hope that our comments are used constructively to make certain that this draft plan properly plans for the natural capital needed within the Borough and ensures that any development is truly sustainable.</p> <p>Where we are proposing a change to policy or the supporting text, recommended additions are highlighted in <b>bold</b> and deletions are <del>struck through</del>.</p> <p>Crawley 2035 Vision SWT notes that the last heading in the Vision relates to protecting the environment. This is welcome, however we are concerned that this section includes an unnecessary focus on the road network. We support the reference to active travel and public transport, but these need to be prioritised if CBC is going to be successful in transitioning Crawley to a carbon neutral town. Paragraph 110 of the National Planning Policy Framework (NPPF) is clear that development should give priority first to pedestrian and cycle movements and second, to facilitate access to high quality public transport. We feel that the wording in the vision is currently too 'business as usual' in terms of its ambitions for sustainable transport.</p>	Agree - proposed amendments to the Vision have been incorporated.

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			<p>Similarly, SWT would encourage stronger and more positive wording in relation to CBCs commitment to biodiversity within the Vision.</p> <p>We therefore recommend the following modifications to the Protecting the Environment section:            '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 <del>strategic</del> road network that prioritises sustainable transport modes. Electric Vehicles will be promoted along with, and through, e-car clubs. A <del>strong</del> sustainable road network will be complemented by a good public transport system, giving people a genuine 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 and reduce their need to travel.</p> <p>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. The borough will protect the connectivity and function of its network of protected sites while delivering wider net gains to the borough's biodiversity. Losses to protected and priority species and habitats will have been avoided and the delivery of vital ecosystem services, including pollination, flood alleviation and carbon capture, will have been enhanced in order to facilitate a sustainable and resilient future. <del>including through pollination and connectivity measures, to address and mitigate against losses.'</del></p>	
REP184/707	Sussex Wildlife Trust	Spatial Context	<p>Section 2 – Crawley 2035 Spatial context            SWT is concerned that this section fails to acknowledge the natural environment and in particular the biodiversity of the Borough. There</p>	Agree – new wording has been included in this section to highlight

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			is a clear need for the draft Local Plan to consider the spatial context for the delivery of biodiversity over the lifetime of the plan. In particular, CBC must take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure as per paragraph 171 of the NPPF. Therefore there is a need to consider the special components and the functioning of the existing network within the Borough.	the importance of the borough's green infrastructure.
REP188/772	Turley on behalf of Rainier Developments		<p>1.1 These representations have been prepared by Turley, on behalf of Rainier Developments Limited ('Rainier'), in response to the Draft Crawley Borough Local Plan 2020 – 2035 (July 2019). This representation relates to land to the south of Station Way (also referred to as 'MOKA'), Crawley, which is currently subject to a full planning application (CR/2019/0542/FUL) with the following description of development:</p> <p><i>“Demolition of existing nightclub and redevelopment of site providing 152 apartments, Ground Floor Commercial / Retail space (Class A1, A3, A4, B1 and/or D2 uses) split between 2 to 4 units, new publicly accessible public realm (including Pocket Park), new publicly accessible Electric Vehicle Charging Hub and Car Club and associate works”.</i></p> <p>1.2 A location plan is enclosed at <b>Appendix 1</b>.</p> <p>1.3 The proposed development seeks to deliver new residential development within a key town centre location, which will align with the wider regeneration scheme along Station Way, and will assist in the creation of a new gateway to the Town. Rainier has a strong track record of delivery and the redevelopment of the site will deliver 152 residential dwellings early on in the plan period and therefore will assist with the wider delivery aspirations of the New Local Plan.</p> <p>1.4 These representations have regard to the national and local policy context, and are framed in the context of the requirements of</p>	

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			<p>Local Plans to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF) (2019), paragraph 35. For a development plan to be sound it must be:</p> <ul style="list-style-type: none"> <li>• <b>Positively Prepared</b> – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</li> <li>• <b>Justified</b> – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</li> <li>• <b>Effective</b> – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</li> <li>• <b>Consistent with National Policy</b> – enabling the delivery of sustainable development in accordance with the policies in this Framework.</li> </ul> <p><b>2. Representations</b></p> <p>2.1 This section sets out Rainier’s response to the Draft Crawley Borough Local Plan 2020 – 2035, taking each section and policy in turn.</p> <p><b>Review</b></p> <p>2.2 Rainier welcome the Draft Local Plan’s commitment to a review of the plan in 2025, five years after the anticipated adoption of the Plan in 2020, in order to ensure that the Plan remains up-to-date and consistent with national policy and ultimately the legal requirement for all local plans to be reviewed at least every five years. This is also necessary given the significant level of unmet need from the wider Northern West Sussex Housing Market Area. In undertaking regular monitoring and review, it will be possible to identify any</p>	<p>Para 1.31 of the Local Plan explains that a review will be undertaken within 5 years to meet the requirements of the NPPF. It also describes the process should monitoring show an earlier review is necessary.</p>

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			<p>shortcomings in the Plan and identify any delay in the delivery of strategic housing allocations.</p> <p>2.3 While it is recognised that all local plans should be reviewed at least every five years in accordance with the NPPF (footnote 18), Rainier consider that a new policy should be included within the Draft Local Plan. Such a policy would formalise the period for review and identify any relevant triggers which would require an early review of the Plan (i.e. the level of unmet housing need is not being met within the wider Northern West Sussex Housing Market Area).</p>	
REP188/773	Turley on behalf of Rainier Developments	Vision	<p><b>Crawley 2035: A Vision</b></p> <p>2.4 Rainier welcome the strategic vision for the Plan, in particular its focus on wellbeing, creating stronger communities, delivering the Borough's housing needs and working towards becoming a carbon neutral Town.</p> <p>2.5 Rainier's proposals for Station Way will contribute to meeting Crawley's housing needs in a central location within the Town Centre, complementing the emerging Station Gateway scheme, and will therefore be consistent with this vision. The site is in a central location, in close proximity to Crawley Train and Bus Stations, so is inherently sustainable and promotes walking, cycling and the use of public transport, with excellent connections within and beyond the region. Recognising this, the proposals therefore include limited car parking spaces. Of the spaces provided, five will be operated as an electronic vehicle (EV) car club, with all other spaces providing EV charging points available to all Crawley residents and visitors. It is therefore considered that the proposed development will deliver much needed housing within a highly sustainable location, promoting the use of active and sustainable transport, aligning with the Council's vision of protecting the environment and making significant progress towards Crawley becoming a carbon neutral town.</p>	The MOKA site is allocated as a Town Centre Key Opportunity Site in Policies TC3 and H2.

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			2.6 It will also deliver significant benefits for the wider community through the provision of a high quality pocket park, contributing to the wider public realm improvements planned as part of the Station Gateway proposals.	
REP196/806	Environment Agency		<p>Thank you for consulting us on the above. We have the following comments to make.</p> <p><b>FLOOD RISK</b> <b><i>Draft Local Plan</i></b></p> <p>The commentary in the draft Local Plan highlights that due to the constraints that are present within the Borough and the housing requirement to meet predicted demand, there is likely to be a need for Crawley to work strategically with adjacent Local Authorities to assist in reducing the unmet housing gap. It is essential that Crawley works closely with adjacent Local Authorities in order to strategically manage flood risk. Watercourses cross over Authority boundaries, flood risk should be considered on a catchment basis as development in one area can have impacts elsewhere. Planning Policy requires development to demonstrate and ensure that flood risk can be managed on site for the lifetime of the development, without increasing the risk to flooding elsewhere.</p> <p>The Strategic Flood Risk Assessment (SFRA) for the Crawley Borough area is referenced within the Supporting Guidance Documents. The Council may wish to consider whether the SFRA is up to date, and reflects the most recent flood risk information. The Environment Agency has recently undertaken a project to update the flood risk mapping for the Upper Mole area, which Crawley Borough is located within. The latest and most up to date flood risk mapping should be utilised as part of the development of the draft Local Plan. We also new guidance on Strategic Flood Risk Assessments.</p>	<p>The council agrees flooding and drainage are cross boundary issues to be addressed as part of the duty to cooperate. The council is working with Horsham District Council to update the Strategic Flood Risk Assessment for the upper River Mole catchment. This work is being undertaken in consultation with the Environment Agency. Policy H3g (urban extensions) (sub para. iii) identifies flooding and drainage as one criteria which the council will use in engaging with adjacent authorities, developers and other stakeholders.</p>
REP196/813	Environment Agency	Local Plan Map	<b><i>Draft Local Plan Map</i></b> No comments.	



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REP196/815	Environment Agency	Consultation Statement	<p><b><i>Draft Consultation Statement</i></b>  Below para 1.6 - Only Southern Water is identified as a key stakeholder. Thames Water provides the sewerage provision (see Draft Infrastructure Plan p7). SES Water and South East Water supply water to small parts of the area (as described in the Draft Infrastructure Plan).</p>	Noted. Crawley Borough Council has jointly commissioned an updated Water Cycle Study, working with Horsham District Council, Mid Sussex District Council and Reigate & Banstead Borough Council. This work is being supported and informed by a wider stakeholder group that includes the Environment Agency, Natural England, Southern Water, Thames Water, South East Water and Sutton & East Surrey Water.
REP196/819	Environment Agency	Consultation Statement	<p><b><i>Consultation Statement, July 2019</i></b>  Page 3 - The table does not mention Thames Water as having been consulted. This is one partner that would have direct impacts on maintaining and / or improving water quality so they should have been consulted.</p>	Noted. To confirm, Thames Water has been consulted on the Local Plan and has provided feedback at the Regulation 18 stage and in relation to the draft Infrastructure Plan.
REP204/908	Resident 8		<p>As a disappointed but not surprised resident, I have just been looking at the plans for the overall development of Crawley, some ideas are indeed laudable as it is agreed that extra housing (within reason - being the operative term) is obviously needed. I am so despondent about how our Town will develop, I have to write despite the fact that I know it is a complete waste of my time and energy!</p> <p>It would appear that some of the current conversions etc. could be merely a money making scheme for Developers (and I use the term loosely in some cases), with absolutely no consideration for the wellbeing of the current population of Crawley. This is obvious from planning permission eventually granted despite initial refusal and with good reason, totally against and in spite of the feelings and</p>	The Government's Standard Method for the identification of housing need indicates a need for 752 additional dwellings on average arising in Crawley over the Local Plan period which, even with higher densities within the borough, cannot be met in full within the borough boundaries. It is important that the council can demonstrate it is doing all it can to maximise housing delivery with the borough and is "leaving no stone unturned"

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			<p>concerns of local people, East Park being one such plan, a classic example, with not one but two further planned developments in a very small and already congested rat run, a great example of empathetic planning, and we are not alone! You can therefore see why I do not waste my time going to any of the exhibitions to make comments, my neighbour has done so and found that the responses are so banal and insulting to one's intelligence, that it is just a waste of time. I too believe that any such 'Consultation' is just a tick box exercise.</p> <p>It is irresponsible and galling that this Government, and our Council without any objection, seem to be obsessed with filling every square metre with dwellings, some at the cost of the quality of life for residents local to these sites. Some are eyesore developments not in keeping with the surroundings, add to that the current level of litter around the perimeter of town (in this particular residential area it is out of control and unacceptable and should be an embarrassment to any council), traffic and the inevitable pollution from the increase, plus general pollution, and communication paraphernalia with ever increasing masts, not to mention eventual overcrowding if the current volume of building and conversions continue (we are not in Japan - they actually care about the opinions of their population) and with the knowledge of currently what is only a shoestring healthcare infrastructure.</p> <p>It is a fact that the NHS is in crisis at the moment, therefore no amount of planning and CCG consultations would improve it in time for the huge increase in the amount of residents as planned by individuals that have no understanding of transfer from paper to reality, and from experience, care even less about the consequences. It would be of interest to know how many of these</p>	<p>in identifying suitable sites. This is particularly so in light of the focus in national policy on increasing residential density within existing settlements while retaining strong protections for the Greenbelt. This means giving consideration to all potentially suitable sites, and only excluding sites when there is evidence to justify this</p> <p>The Infrastructure Plan sets out the Local Planning Authority's current understanding of the position in respect of the various forms of Infrastructure provision. The Plan as a whole will provide a basis to ensure that development is supported by the necessary infrastructure, including (where appropriate) requiring developers to provide infrastructure or provide financial contributions towards it. In respect of health facilities: the Local Plan can identify the infrastructure needs associated with the existing population and needs emerging from new development. However, the NHS will advise on their strategy for meeting health needs. The council will continue to liaise with the NHS.</p>

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			<p>planners actually live in the area and have real knowledge of the situation.</p> <p>That said my question is this :- When you as a local Council know that the infrastructure is currently inadequate and in no way suitable for the current population, why are you continuing to plan for and to build dwellings with no finalised idea of what healthcare and facilities will <b>realistically</b> be possible. Plans there may be, but it would seem only on paper and in consultation with the CCG for potential facilities, or have I misunderstood and there is in fact a realistic and empathetic master plan?</p>	
REP204/915	Resident 8		<p>Thank you for your response, I would indeed be interested. Furthermore, on the subject of planning and something I omitted to include even though unfortunately it is only anecdotal, is that my neighbour at a consultation on East Park asked one of the representatives of the company converting Zurich House, why they could not build houses to include parking as suggested by local residents, in keeping with the surrounding very old and very characteristic neighbourhood, we would have been very pleased with that outcome as we are not against housing but against inappropriate housing, the houses could of course have been partially social housing as well. She was told quite frankly that it would not be as profitable. My cynical outlook and that of my neighbour followed that one comment, as we felt that it confirmed our fears. I just wanted to give you some background to my heartfelt observations on planning as well as my very real concerns regarding the healthcare issue.</p>	See above regarding higher density development.
REP209/933	Horsham District Council	Para. 2.29	<p>Thank you for consulting us on the Draft Crawley Borough Local Plan 2020 -2035. We are grateful for the opportunity to be able to comment on your emerging plan. Horsham District Council recognises that your authority faces considerable challenges in ensuring it can meet the future needs of Crawley within what is a</p>	Support noted.

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			<p>tightly bound administrative area. Overall we consider that the plan has positively sought to balance the provision of those future needs with other wider objectives in a manner that contributes to achieving sustainable development. We do however have some more detailed comments on the draft document which are set out in the following paragraphs.</p> <p><b>Spatial Context and the Duty to Co-operate</b>  This Council recognises and supports the context of Crawley set out in the draft Local Plan documentation. We note the strong economic relationships that the town has with other local authorities in the Gatwick Diamond and those within northwest Sussex (i.e. Horsham and Mid Sussex Districts) in particular. Given these clear linkages, we are committed to continuing our programme of joint work on evidence base documents and continued constructive discussions as part of the Duty to Co-operate to seek to ensure that the wider needs of the area can be addressed as far as possible. As you know Horsham District Council is currently providing 150 homes per year towards meeting the unmet housing needs of Crawley in our current local plan (the Horsham District Planning Framework). Following the introduction of the Standard Housing Methodology our own housing requirements have increased significantly and we therefore welcome the recognition in paragraph 2.29 of the increasing challenges we all face in meeting housing needs.</p>	

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REP150/452	Sport England	Policy SD2	<p>I would like to make a couple of observations on <i>Strategic Policy SD2: Enabling Healthy Lifestyles and Wellbeing</i>. Sport England &amp; Public Health England's Active Design guidance <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</a> sets out established guidance on how the design and layout of new developments can be planned to make communities more active and healthier and some of the principles in this guidance could be referenced in the policy. This is in line with Section 8 promoting healthy and safe communities in the revised NPPF.</p> <p>The policy or the supporting text could also make reference to the expectation that development will accord with the guidance in the Essex Design Guide. The latest review of the guide: <a href="https://www.essexdesignguide.co.uk">https://www.essexdesignguide.co.uk</a> which covers the full range of residential urban design guidance matters has embedded Active Design principles throughout the guidance. The supporting text to the policy should refer to the Essex Design Guide and/or the Active Design guidance to signpost applicants to detailed advice.</p>	<p>Reference to the Sport England and Public Health Active Design guidance has been referenced in the Reasoned Justification supporting the Policy (para. 3.16). This has included setting out the “Ten Principles of Active Design” and providing the weblink.</p> <p>The principles in Essex guide will be considered to be incorporated into the Urban Design SPD Review where useful and relevant. Reference has been made to this, including the link, in the Reasoned Justification supporting the Policy (para. 3.16).</p>
REP152/462	Historic England	Policy SD1	<p>We are pleased that the overarching policy in this respect, Strategic Policy SD1: Presumption in Favour of Sustainable Development, includes recognition of this in bullet point 3, but we suggest the wording is changed from the neutral term ‘Respect’ to the more positive ‘Conserve and enhance’ to more accurately reflect the intention of the NPPF.</p> <p>A positive strategy in the terms of the NPPF is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of</p>	<p>Comment noted – amendment has been made in the Policy to refer to “conserve and enhance” in conformity with the intention of the NPPF.</p>

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			development, including within their setting, that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.	
REP177/647	The Woodland Trust	Policy SD1	<p><b>About the Woodland Trust</b> The Woodland Trust (“the Trust”) is the UK's leading woodland conservation charity, and wants to see a UK that is rich in native woods and trees, for people and wildlife. We aim to achieve this by restoring and improving woodland biodiversity and increasing people's understanding and enjoyment of woods and trees. We own over 1,275 sites across the UK covering over 23,580 hectares and have around 500,000 members and supporters. The Trust is recognised as a national authority on woods and trees and a protector of the benefits and values that they deliver for society. We welcome the opportunity to comment on the draft Crawley Local Plan 2035.</p> <p><b>Sustainable Development</b> Policy SD1 - We welcome the priority given to Crawley's commitment to being carbon neutral by 2050. We strongly welcome the inclusion of ancient woodland as a protected designation in para 3.4, in line with the NPPF. We would also urge policy in support of new tree planting and woodland creation (see also our comment on section CD3). A rapid increase in the rate of woodland creation has been proposed by the UK's Committee on Climate Change, to provide a key mechanism to lock up carbon in trees and soils, provide an alternative to fossil fuel energy and resource-hungry building material, and importantly to stem the declines in biodiversity.</p>	<p>Support noted for ancient woodland reference in para. 3.4.</p> <p>Policy SD1(4) establishes the strategic principle for development to protect, enhance and create opportunities for Crawley's Green Infrastructure.</p> <p>Policy DD5: Tree and Landscape Character Planting requires one new tree, or equivalent landscape character planting, for each new dwelling.</p> <p>Policy DD6: Tree Replacement Standards requires in the first instance trees to be retained on site, and where it is agreed they are unable to be, a contribution is required for off-site tree replacement planting, equivalent to the size of the tree to be lost.</p>

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REP184/708	Sussex Wildlife Trust	Para. 3.9 & Policy SD2	<p>Section 3 – Sustainable development</p> <p>We feel that section 3.9 has clear scope to reflect the importance of high quality green space in a healthy functioning environment. Therefore we suggest that the following amendment is made to bullet point 4 of 3.9: ‘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 <b>and high quality green space accessible to all.</b>’</p> <p>Strategic Policy SD2: Enabling Healthy Lifestyles and Wellbeing In line with our comments above and sections 91 and 92 of the NPPF, policy SD2 should be amended to ensure that new development considers the benefits that high quality green infrastructure, which promotes biodiversity, in increasing wellbeing. Additionally, as mentioned above, the NPPF is clear that sustainable modes of transport must be prioritised through development (paragraph 110). This is reflected in the wording of policy ST1 and therefore should also be reflected in SD2 for both clarity and consistency.</p> <p>We therefore recommend the following amendments to SD2:…In order to maximise opportunities to enable healthy lifestyles, new development must:</p> <ul style="list-style-type: none"> <li>• 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);</li> </ul>	<p>Agree: amendment made to bullet point 4 of para. 3.9, accordingly.</p> <p>Agree: amendment made to Policy SD2 bullet point 4.</p> <p>Agree: amendment made to Policy SD2 by new additional bullet added.</p>

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<ul style="list-style-type: none"> <li>• Meet the needs of all through the use of the highest standards of accessible and inclusive design (Policy CD10);</li> <li>• Provide opportunities for high quality open space, play and recreation (Policies OS1 – OS2);</li> <li>• <del>Promote</del> <b>Prioritise</b> the use of accessible and reliable sustainable transport and <b>active travel through providing encourage</b> greater levels of safe and attractive opportunities for active travel (Policies OS3, ST1 – ST2);</li> <li>• Be supported by, and not result in a loss of, necessary infrastructure provision (Policies IN1 – IN2); and</li> <li>• Ensure proposals are safe for future site users and do not result in unacceptable harmful impacts (Policies EP1 – EP5).</li> <li>• <b>Ensure proposals incorporate biodiversity and green infrastructure which enable climate change resilience (Policies GI1 – GI2)</b></li> </ul>	
REP185/734	Carter Jonas on behalf of Homes England		<p>On behalf of our client, Homes England, please find enclosed representations to Crawley Borough Council's Local Plan Review 2020 – 2035 (Regulation 18) (hereafter referred to as "CBCLPR").</p> <p>Homes England is an executive non-departmental public body, sponsored by the Ministry of Housing, Communities and Local Government (MHCLG). Homes England is the government's housing accelerator. Homes England has the appetite, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities.</p>	<p>Noted.</p> <p>Representation details made are considered under each relevant section under the Chapter Tables below.</p>



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			<p>Homes England works in collaboration with partners who share our ambition. These include local authorities, private developers, housing associations, lenders and infrastructure providers. Within the next few years, Homes England will have invested over £27 billion across our programmes.</p> <p>Homes England mission is to intervene in the market to ensure more homes are built in areas of greatest need, to improve affordability. Homes England will make this sustainable by creating a more resilient and diverse housing market.</p> <p>Homes England has experience in acting as a 'master developer' on schemes such as the Northern Arc in Burgess Hill. In the case of Burgess Hill, we acquired the site, which has been identified as a location for major housing delivery for over 10 years but had stalled due to the complexities of land ownership and the need for upfront strategic infrastructure delivery. Homes England worked closely with Mid Sussex District Council, the landowners and the site promoter to acquire the land. At the Northern Arc, we are investing in the required infrastructure to release the first phases of development early.</p> <p>At West of Ifield, we will take a similar approach as the master developer to accelerate the delivery of key infrastructure to enable housing to be built out quickly.</p> <p>Furthermore, acting as a master developer will enable Homes England to maintain the highest design standards across the scheme from outset to completion as well as delivering significant social, economic and environmental benefits to the existing neighbourhoods of Crawley.</p>	

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>These representations relate to the promotion of Rowley Farm for employment uses and of which a Call for Sites submission has also been made by Homes England under separate cover, and also to specific policies and proposals in the CBCLPR including the safeguarding of land for the expansion of Gatwick Airport (GAT2), the safeguarding of the proposed Crawley Western Relief Road ('CWRR') (ST4) and those policies that relate to urban extensions and which are relevant to the proposed development of land west of Ifield.</p> <p>Each representation is set out under a separate heading below and reflects the tests of soundness set out in the NPPF (paragraph 35) that plans should be positively prepared, justified, effective and consistent with national policy.</p> <p>In addition to this representation, Homes England includes a representation prepared by Wood Environment &amp; Infrastructure Solutions in relation to the site at Tinsley Lane. This representation is attached to this letter.</p>	
REP186/758	CPRE Sussex		<p>This is the formal response from CPRE Sussex – the Countryside Charity - to the above consultation.</p> <p><b>Sustainable Development Chapter Consultation Questions: What should be the key priorities for making Crawley a more sustainable place by 2035?</b></p> <p>Para 5.26 notes that '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...' The natural capital of the countryside surrounding Crawley should not be undervalued. To</p>	<p>Crawley is a land-constrained borough and a planned New Town. This offers limited opportunities for new development to meet the scale required by the NPPF in order to meet the needs of the growing population. The Local Plan seeks to maximise the opportunities for meeting the development needs within the urban area as far as possible and constitutes sustainable development. However, there are areas of valuable employment, open space, biodiversity</p>

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			<p>achieve Sustainable Development, Crawley must deliver as much of its housing target within its existing built up area boundary as possible.</p> <p>Paras 1.26 and 1.27 describe cross-boundary strategic issues which Crawley Borough Council (CBC) is progressing through joint working under the Duty to Co-operate. We would like to see further information about how Green Infrastructure (GI) will be explored across LPA boundaries. Has the Council explored the production of joint research and evidence gathering to support policy choices in relation to biodiversity networks across LPA boundaries in a way which is consistent with Paragraphs 24-27 and 174 of the Framework? The reference to this in para 2.41 is quite vague.</p> <p>Following CBC's declaration of a 'Climate Emergency' in July of this year we welcome para 2.34 and the proposal to 'build upon nationally described standards to ensure that the borough's potential to adapt and mitigate against the effects of climate change is maximised.' We believe that this is consistent with S19 (1A) of the Planning and Compulsory Purchase Act 2004. The translation of this is seen in Policies CD2, SDC1 and SDC2, which we fully support.</p>	<p>sites and heritage assets which also warrant strong protection.</p> <p>Land outside Crawley's Built-Up Area boundary substantially falls outside of the borough's administrative boundaries, and is therefore under the Planning control of the neighbouring Local Planning Authorities. Unmet need arising from Crawley is to be considered by the neighbouring authorities as part of Duty to Cooperate discussions in meeting as much of it as they are able to within their own Local Plans.</p> <p>CBC is supported by the Sussex Biodiversity Record Centre as part of the Sussex Authorities in relation to Biodiversity recording and the Local Wildlife Sites. CBC have recently jointly commissioned the Record Centre with Horsham District Council to undertake an EcoServe assessment which covers the two authority areas. The council also works closely as part of the Gatwick Greenspace Partnership alongside neighbouring authorities<sup>1</sup>. Increased reference has been made to the Local Plan to reflect this partnership working (para. 2.34/2.35). Support for paragraph 2.34 and policies CD2, SDC1 and SDC2 is noted.</p>
REP188/774	Turley on behalf of	Policy SD2	<b>Policy SD2: Enabling Healthy Lifestyles and Wellbeing</b> 2.7 Rainier agree in principle with this proposed policy and its intention to facilitate and control development to promote	Disagree. The policy is flexible in how it can be achieved.

<sup>1</sup> Surrey and West Sussex County Councils; Horsham, Mole Valley, Reigate and Banstead District and Borough Councils; Horley Town Council and Gatwick Airport Limited

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	Rainier Developments		<p>healthy physical and mental lifestyles. NPPF paragraph 96 recognises that access to high quality open spaces can make an important contribution to the health and well-being of communities, the proposed high quality pocket park on the MOKA site will therefore make a significant contribution to achieving healthy lifestyles. The proposals also promote this through the provision of private amenity space, (including a roof garden).The commercial space at ground floor level has been designed to include co-working space. Such facilities will increase opportunities for the social interaction of residents as well and aligning with the wider range of improvements to the public realm and pedestrian infrastructure associated with the Station Gateway scheme.</p> <p>2.8 As currently drafted the policy states that “new development <b>must</b> be designed to achieve healthy, inclusive and safe places”. NPPF paragraph 11 seeks for Local Plans to be flexible in order to respond to rapid change. On this basis we recommend the policy is reworded as follows to ensure the plan is able to respond to rapid change:  <i>“New development <b>should</b> 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...”</i></p>	In this instance, it is considered reasonable that development must be designed to achieve healthy, inclusive and safe places. The detailed policies in the Plan will apply to new development proposals and this Policy seeks to identify those which will particularly support the health and wellbeing agenda.
REP196/817	Environment Agency	Policies SD1	<p><b>INTEGRATED ENVIRONMENTAL PLANNING</b>  <b>Draft Local Plan</b>  Page 13, 1.26 - The strategic issues relating to the future development of Crawley do not include water resources. Considering that the South East is an area that is susceptible to water stress, which has been acknowledged</p>	<p>Agree: new bullet included in para. 1.26 relating to water resources.</p> <p>Comments in relation to water stress references in paras. 2.33-2.35 noted.</p>

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			<p>in the Local Plan (refer to comment 2 below), consideration should be given to including water resources as a strategic issue.</p> <p>Page 24, 2.33 -2.35 – This section deals with Environmental Sustainability, which highlights that the borough has been identified as an area of serious water stress. Page 178, 14.5 reinforces the point of water stress. The consequences of water stress are dealt with to some extent in the Local Plan, but dealing with water stress has not been consistent in all sections of the Local Plan.</p> <p>Page 24, 2.33 - 2.25 – This section deals with water stress, but does not mention water quality. In a high density, growing urban area, water resources and water quality should both be addressed. As more water is required, less is available for ecosystems, more wastewater is produced, which may ultimately affect the aquatic environment. Another point that should possibly be included in the section of environmental sustainability is the risk of stress on sewage infrastructure as the population grows. This may lead to negative impacts on water quality.</p> <p>Page 27, Strategic Policy SD1 – Although this policy is directed at Sustainable Development, there is no reference to water resources / water quality. As water quality is closely related to water use, which in turn is an important part of sustainable development, consider including an additional strategic objective to help meet SD1 that is directed at water resources and water quality. For example, no development should impact negatively on the quality or status of water bodies.</p>	<p>Para. 2.35 has been amended to include comments made in relation to water quality and sewage infrastructure.</p> <p>It is considered that the Strategic Policy SD1 is overarching and covers all requirements which are provided in more detail in the Plan. In relation to water quality, this is picked up by SD1(4): Protects, enhances and creates opportunities for Crawley’s unique Green Infrastructure and SD1(7). Policy G11 applies to Crawley’s waterway (para. 13.7). Additional reference has now been included to waterways and water bodies in the list set out in para.13.15. Furthermore, clarity will be provided in the definition of Green Infrastructure in the glossary to it applying equally to the “blue” infrastructure.</p> <p>Comment relating to developments setting out how they address the requirements of Policy SD1 is anticipated to be met by the applications’ Design and Access/Planning Statement.</p> <p>In respect of para. 8.5 this is an overarching paragraph covering all infrastructure needs of Crawley. This includes reference to “utility” facilities, and this is further clarified in para. 8.7 which makes clear reference to waste water treatment. It is considered that the Infrastructure Plan (in liaison with the waste water infrastructure providers) will highlight necessary works and impacts. This is a requirement for the providers in consultation with the EA. It is anticipated this will</p>

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			<p>To further strengthen Strategic Policy SD1, consider including that major developments (or all developments) should set out how they address the requirements of the policy, which would be in line with a similar approach within Strategic Policy SD2.</p> <p>Page 83, 8.5 – The key issues on infrastructure provision rightly state that a critical point may soon be reached whereby a new (or upgraded) sewage treatment works may be needed. This shows that sewerage infrastructure is, or may soon be, under stress, which could negatively affect water quality. The Local Plan could be improved by linking water stress to the risk of deteriorating water quality, especially with sewerage infrastructure operating at near capacity and the risk this places on water quality in the event of failing sewerage infrastructure.</p> <p>Page 84 – <i>“Where appropriate and in line with the CIL Regulations, Section 106 agreements will address site specific issues”</i>. Considering the threat to water quality from the growing population and large developments, it may be beneficial to include water quality monitoring in section 106 agreements to ensure no deterioration of the status of water bodies, especially with large developments.</p> <p>Page 186, The section on Tackling Water Stress should reference the need to protect against deteriorating water quality.</p> <p>Page 206 - Appendix A: Sustainability Objectives have no direct reference to water resources or quality, even though water is an important aspect of sustainability.</p>	<p>be assessed as part of the update of the Water Cycle Study.</p> <p>With regards to the CIL and S106 requirements, this will be explored further through the Planning Obligations Annex and paragraph 8.9 in relation to enforcement and monitoring.</p> <p>Reference has now been included in the Policy to clarify that minimising “its impact on water resources” includes protecting against deteriorating water quality.</p> <p>Water resources and quality, in relation to water stress are captured in the Sustainability Objectives under:</p> <ul style="list-style-type: none"> <li>• Sustainability Objective 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;</li> <li>• SO6: To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough; and</li> <li>• SO8: To ensure the provision of sufficient infrastructure to meet the requirements of the borough.</li> </ul>

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REP198/830	The Ifield Society		<ul style="list-style-type: none"> <li> <b>What do you think are Crawley's Key Strengths and Weaknesses as a Sustainable Place?</b>  <u>Strengths</u> A young, vibrant, positive town – likely to achieve City status – with the hope, ability and energy to achieve its Vision (page 16) and Sustainability Objectives (page 206)  <u>Weaknesses</u> An inability to control Air and Noise Pollution resulting from airport growth. An inability to provide affordable housing, especially for the young and those with disabilities. An inability to protect and preserve its history and heritage.           </li> <li> <b>What should be the Key Priorities for making Crawley a more Sustainable Place?</b>            Take firm, bold action to control Air and Noise Pollution. Improve the provision of affordable housing (e.g. Council Housing).            Implement policies and procedures which protect and preserve the town's history and heritage (e.g. Upgrading Ifield Brook Meadows Local Green Space to Local Nature Reserve (LGS to LNR) <b>*Appendix 3 &amp; 4 provided with original representation to support*</b> </li> <li> <b>Is there anything in your Local Area which you feel affects your Health?</b>            Air Quality and Noise Levels.            Reduced amount of open spaces for healthy walks and recreation.            Less wildlife to see and energy in their natural habitats due to housing over development.           </li> <li> <b>What do you think the Health and Wellbeing Priorities should be for Crawley?</b>            See Appendix A <b>*provided with the original representation to support*</b> </li> </ul>	<p>Comments noted.</p> <p>Policies H5: Affordable Housing; EP4: Development and Noise; EP5: Air Quality; and HA1-HA7: Heritage Assets seek to address the concerns raised.</p> <p>The Local Green Space designation recognises Ifield Brook Meadows' value for biodiversity, recreation, landscape, heritage, tranquillity and accessible countryside. It is also a Local Wildlife Site, designated and re-considered recently by an independent Panel of experts for its wildlife importance.</p> <p>The council have previously explored the possibility for the site to be designated as a Local Nature Reserve. However, the permission and support from the landowner is necessary in achieving this designation. Homes England are the landowners for this site.</p> <p>Healthy walks and recreation are promoted through Policies SD2, OS1, OS2 and OS3 of the Local Plan.</p>

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			<p>Sustainability Objectives, especially 6 and 9 (page 206). See Crawley 2035: A Vision, especially the first 5 paragraphs (page 16).            Prioritise healthy walks and recreation, especially to the west of the town (e.g. the ancient Parish of Ifield, including Ifield Brook Meadows Local Green Space (LGS) (upgraded to Local Nature Reserve (LNR)), Ifield Wood and Ifield Golf Club <b>*Appendix I provided with original representation to support*</b></p>	
REP107/843	Town Access Group		<ul style="list-style-type: none"> <li> <b>What do you think are Crawley's Key Strengths and Weaknesses as a Sustainable Place?</b>                One reason is the generally high standard of disabled access which is good for residents and has made it a mecca for disabled visitors over a wide area. Notable venues are town centre shopping, Tilgate Park, the Hawth, K2, the museum. Now we need a step-free Crawley Station.             </li> <li> <b>Is there anything in your Local Area which you feel affects your Health?</b>                In the town centre (e.g. Boulevard and High Street) and places in all neighbourhoods, poor pavements are an issue for wheelchair users and the less mobile. It restricts independence, exercise and therefore health when people find it difficult or unsafe to travel.             </li> <li> <b>What do you think the Health and Wellbeing Priorities should be for Crawley?</b>                Adequate GP and dentist coverage. Provision of safe pavements. Good lighting (improvement needed in Memorial Gardens) for sense of security after dark. Good toilet provision 24/7 essential, including changing places facilities.             </li> </ul>	<p>Comments relating to disabled access within the town are noted.            Existing pavements are outside of the scope of the Local Plan. However, Policy CL2c) requires development proposals to make places permeable and connect; Policy DD2 requires developments to meet the requirements necessary for their safe and proper use, in particular with regard to access (DD2e), and to be supported by a future management and maintenance plan for all shared hard and soft landscaping, semi-public or semi-private areas; and Policy DD3 requires development proposals to achieve the highest standards of accessible and inclusive design, including ensuring they can be entered, used and exited safely, easily and with dignity by all.            The Infrastructure Plan establishes the position of the health providers in respect of the coverage of health services.</p>



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REP107/308	Town Access Group	Policy CD10	<p>CBC LOCAL PLAN CONSULTATION 2019 Submission from Crawley Town Access Group (TAG)</p> <p>Issue: <b>HOME EXTENSIONS – ADD REQUIREMENT</b> page 52. CD10 Inclusive Design</p> <p><b>Consultation Question: Is there anything missing which should be included?</b></p> <p><b>TAG’s Response</b> Yes. This is a great opportunity to make wheelchair-inaccessible homes accessible, by adding simple requirements. A policy addition is needed to achieve this, as proposed below.</p> <p><b>New policy</b> All dwelling extensions and in-fill developments that include a new external entrance must comply with the same Building Regulations for entrances as newly built homes. These require a level or ramped entrance and minimum door width. As with new-build homes, sensible exceptions would be permitted, but detailed advice should be made available. Other inclusive features (downstairs toilet, 1500mm turning circle and raised power points) should be strongly recommended where practicable.</p> <p><b>Justification</b> Reasons expressed in 4.71 and 4.72, particularly the fact that the existing housing stock will continue to house the vast majority, yet there will be a growing need to provide more accessible housing. 2019 figures to date (01/01 to 14/08) show that of 141 planning applications for home improvements, 119 will have</p>	Agree: However, this additional wording has been incorporated into the existing Policy rather than a new policy.

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			<p>included an external entrance and would therefore have become wheelchair-accessible if this policy had been in place. Currently TAG's digital leaflet (attached) is sent to applicants; we have no means of knowing the outcome, but suspect the uptake is small.</p> <p><b>Note</b> We generally find that people, including some designers, have a limited view of the design possibilities for ramped entrances and this puts people off. A guidance booklet, showing different types and styles to fit a range of contexts, would be helpful. TAG would be happy to help compile this.</p>	
REP143/419	Indigo Planning on behalf of McKay Securities Plc.	Policy CD2 and CD4(a)	<p><b>REPRESENTATIONS TO CRAWLEY LOCAL PLAN REVIEW – ISSUES AND OPTION CONSULTATION</b> On behalf of our client, McKay Securities PLC, we enclose representations to the Crawley Local Plan Review 2020-2035 Issues and Options Consultation. Our client is the freehold owner of two properties within the Borough, located at Pegasus Place and Oakwood Trade Park, both on Gatwick Road, Crawley.</p> <p>Both of these sites are within the Manor Royal and Manor Royal Buffer Zones designations. Our client supports the emerging Local Plan's general aim to promote further growth and regeneration of the Manor Royal Business District. However, we raise a number of general concerns about the clarity, effectiveness and soundness of certain policies, as follows.</p> <p><b>Strategic Policy CD2 &amp; CD4(a)</b> Policy CD2 and CD4(a) do not sufficiently consider the transport needs of Main Employment Areas.</p> <p>Part e) of emerging policy CD2 seeks to "put people before</p>	<p>Policy CD2 and CD4 (a) (now Policies CL2 and CL4) are concerned with new residential development or any other development which will generate significant levels of human movement.</p> <p>It is accepted road transport reliant industries will seek to be located close to strategic road infrastructure. However, these policies will apply where such new industrial development also generates significant human movement. Public transport can also connect to road transport reliant industries, where demand and commercial viability for public transport is justified.</p> <p>In the case of Manor Royal, almost the entire district is already located within 5 -10 minutes walking distance of the Fastway, a high capacity and high frequency public transport service. Plans and programs are already in place to improve and expand further the segregation and therefore speed and reliability, of these services. Policy</p>

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			<p>traffic and integrate land uses and transport networks as outlined in Policy CD4a”. Whilst this is generally a positive policy aim, it does not take appropriate consideration of transport based and transport reliant industries such as distribution warehouses and other industrial operations. For these industries, being located close to strategic road networks is more sustainable and efficient than being <i>“located adjacent to stations, stops or interchanges along...public transport corridors”</i> as required by Policy CD4(e). In order to be consistent with sustainability objectives within Policy ST1, this policy should be amended to refer to industrial and business development being located close to strategic road networks as appropriate.</p> <p>Policy CD4(a) also refers to new development being “designed and organised in a way that ensures future inhabitants” are within a 10-minute radius walking distance of rail station and bus stops. The reference to “future inhabitants” is further evidence that the policy is set up to advise predominantly residential development and is not clearly applicable to new employment development. Clarity should be provided to make it clear that Policy CD4(a) applies to new residential development only.</p>	CD4(a)/CL4 is specifically drafted to promote these movement corridors.
REP143/420	Indigo Planning on behalf of McKay Securities Plc.	Policy CD4(b)	<p><b>Strategic Policy CD4(b)</b> Policy CD4(b) sets out density ranges which apply to <b>all</b> new development. However, it only sets out dwellings per a hectare for each density range.</p> <p>Again, this makes it unclear how this policy would be applicable to new mixed use, retail and/or employment development. This policy needs to be clarified to ensure it is explicitly clear what type and/or location of development it is applicable to.</p>	Minimum density figures in themselves do not determine unit numbers nor dictate the exact form of development. Decisions made in relation to any matter related to overall form have to be based on various parameters. There is no simple formulaic answer. Each site needs to be considered on its own merits and take the entirety of the development plan into account. A blanket roll out of development form based on minimal densities

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				will rarely be appropriate.  Foundational policy regarding development form, includes policies CD1 to CD5 (inclusive) (now Policies CL1-CL5 and DD1). There are additional policies, specific to retail and employment areas, which also influence the potential to achieve minimal density targets.
REP143/421	Indigo Planning on behalf of McKay Securities Plc.	Policy CD5	<p><b>Strategic Policy CD5</b> Emerging Policy CD5 sets out a number of specific design tools prospective applicants should employ such as 3D digital modelling. This is overly prescriptive and restrictive. It is possible to assess and demonstrate the quality of new spaces and structures without such expensive methods as digital modelling. Requiring the use of such a specific tool will add unnecessarily to the financial burden for smaller and medium scale developers and could frustrate development coming forward.</p> <p>This policy also refers to accurately testing and exploring design options from a “social line of vision”. No definition or explanation of what this is, or requires, is provided and as such it will be impossible for applicants to know how to satisfy this policy requirement and it is therefore undeliverable and unsound. Without clarity being provided regarding the intention and scope of this policy to make it effective or justified, the policy should be deleted.</p>	This Policy has been significantly amended and some of its requirements only apply to larger developments, for which thresholds are set out in paragraph 4.69. Achieving good design is recognised in the NPPF (and government guidance) as a key aspect of sustainable development and the need to be clear about the impact of new forms of development is particularly essential in order to make efficient use of land. It is also important to secure minimal density ranges for new development across the borough. Reference to “social line of vision” has been deleted.
REP143/422	Indigo Planning on behalf of McKay Securities Plc.	Policy CD6	<p><b>Strategic Policy CD6</b> Policy CD6 encourages development to retain and reuse existing buildings occupying a site or demonstrate why this is not feasible, viable or desirable. However, the removal of buildings to increase the density of a site to make more efficient use of land should be considered desirable. Clarity</p>	This policy wording (now in DD1) encourages retention but allows for flexibility, for example where increased density could be provided. The primary reason retention is encouraged is to aid character retention ( <i>“This is particularly relevant in the case of building, structures or landscape</i>

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			<p>needs to be added to this policy in this respect. This would make sure this policy is consistent with Strategic Policy CD4(a): Effective Use of Land.</p> <p>Policy CD6 also states that development proposals should “comply with” any relevant supplementary planning guidance including Conservation Area Appraisals, the Manor Royal SPD, and advice on signs and advertisements.</p> <p>This is not appropriate or in accordance with the national policy. The PPG is clear at paragraph 008 of ‘Plan-making’ that SPDs do not form part of the Development Plan and that they cannot introduce new planning policies. SPDs are only a material consideration in decision-making. Therefore, it is not appropriate to have a policy requirement within CD6 requiring a blanket compliance with all future SPDs and other supporting documentation. In order to be consistent with national policy, the wording of this policy should be amended to read “Development proposals should give due regard to any relevant supplementary <i>planning guidance</i>...”.</p>	<p><i>features that contribute to local character, setting and context</i>”) and also for reasons of sustainability.</p> <p>The supporting text to Policy DD1 has been amended to explain that further guidance on how development proposals can address the matters in the policy is set out in supplementary planning guidance.</p>
REP143/423	Indigo Planning on behalf of McKay Securities Plc.	Policies CD1 – CD6 and CD10	<p><b>Overlapping Policies CD1-6 and 10</b></p> <p>Policies CD1 to CD6 and CD10 all cover design considerations for development.</p> <p>These eight policies overlap in many places and provide details on the same considerations. For example:</p> <ul style="list-style-type: none"> <li>- Policy CD3 deals with local character and design of new development and Policy CD5 deals with local design standards. This is effectively one and the same and these policies should be condensed and merged.</li> <li>- Both Policy CD2 and CD10 deal with making places and new development inclusive, safe and healthy for all.</li> </ul>	<p>These policies are considered to be complementary and cover strategic and detailed design matters. Achieving good design is recognised in the NPPF as a key aspect of sustainable development and the need to be clear about design expectations is essential (para. 124). Paragraph 125 further explains that plans should set out a clear design vision and expectations so that applicants have as much certainty as possible about what is likely to be acceptable.</p>

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			<p>Policy CD10 could easily be integrated into either Policy CD2 or CD6 as making developments inclusive is a good urban design principle (CD2) and should be a normal requirement for all new development (CD6).</p> <p>This means there is unnecessary duplication of policy requirements. This in turn makes these policies less clear and harder to deliver which could frustrate development from coming forward. For clarity, and in order to be more effective, these policies need to be condensed into a smaller number of more succinct policies which clearly set out the design requirements for new development.</p>	<p>The council disagree with the suggestion of combining them. Policy CD10 (now DD3): Inclusive Design has been made into an independent explicit policy to ensure it is not overlooked, a concern with combining it with CD2). It is important that the cost implications and design opportunities of incorporating inclusive design features are considered at the early stages of development costing and land pricing.</p> <p>However, detailed amendments have been made to these policies and the reasoned justifications to address other comments received through this consultation. In addition, the first two chapters in the Plan have been combined and restructured into two different chapters, in order to be clearer in their scope between the spatially strategic (i.e. the “Character and Landscaping) policies and the more detailed development-specific and design matters.</p>
REP150/454	Sport England	Policy CD2 & CD3	Again, with reference to <i>Strategic Policy CD2: Making Successful Places: Principles of Good Urban Design and Strategic Policy CD3: Local Character and Design of New Development</i> , I believe the inclusion of Active Design, as mentioned above will strengthen these policies.	Comment noted. Reference to ‘active travel’ has been included into Policy CD2g).
REP150/455	Sport England	Policy CD3	With regards to <i>Strategic Policy CD3: Local Character and Design of New Development</i> , Sport England produced specialist design guidance many years ago to ensure that all sections of the community could easily access every type of sports building: <a href="https://www.sportengland.org/media/4508/accessible-sports-facilities-2010.pdf">https://www.sportengland.org/media/4508/accessible-sports-facilities-2010.pdf</a>	Detailed design guidance can be considered later as part of any review of the Crawley Urban Design SPD.

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			I would advise that this document is referenced as a design document.	
REP152/463	Historic England	Policy CD2	We note, and support, that Strategic Policy CD2: Making Successful Places: Principles of Good Urban Design requires good design that reflects the defining characteristics of each neighbourhood within the plan area, and reinforces the existing character and distinctiveness of each; and, that the protection and enhancement of heritage assets is integral to this (bullet point a)).	Support noted.
REP152/464	Historic England	Policy CD3	We support Strategic Policy CD3: Local Character and Design of New Development; however, we suggest the inclusion of 'and their settings' after 'heritage assets' in paragraph 1a). The setting of an asset is often an integral part of its significance, in terms of how it is experienced and viewed, and good new development will recognise this. It would also link more directly to the subsequent sub-paragraphs (paras 1b) and c)).  You may like to consider adding a reference to Conservation Area Appraisals to paragraph 2, as these may provide more specific guidance where appropriate than the broader brush Area Wide Character and Design Assessments.	Agreed: amendment made to Policy CL3 1a. as suggested.  Agreed: amendment made to Policy CL3 2 as suggested.
REP152/465	Historic England	Policies CD4 – CD6	The location, design and use of future development can contribute to local identity and distinctiveness, and safeguarding heritage significance. We agree that Policies CD4-CD6 set out a series of design parameters that will help to ensure that high-quality design is achieved in new development and sustainable forms of urban planning are delivered, including the protection of heritage assets.	Support noted.
REP152/466	Historic England	Policy CD8	We support Policy CD8: Advertisements in its references to considering the effects on the character of the locality,	Support noted.

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			including scenic, historic, architectural or cultural value or features in sub-paragraph b).	
REP153/479	Home Builders Federation	Policy CD4(b)	<p><b>Making effective use of land</b></p> <p>We cannot comment on where higher densities would be most appropriate and it will be necessary for the Council to carefully consider their options. We note in policy CD4(b) that higher densities will be considered appropriate around stations and in town centres. These locations would appear to be consistent with the approach set out in the NPPF. However, we are concerned that the Council has looked to set a minimum density of 95 dpa on all small-scale infill development. Such sites inevitable need to conform with the nature of the surrounding area and the Council should not seek to impose unnecessary burdens on such sites. We are also concerned that the imposition of minimum densities could reduce the viability of such sites and the Council will need to carefully consider whether this policy will limit the number of such sites coming forward. Given that the Council expects at least 55 units per annum to come from windfall it will be important to ensure such sites are not unnecessarily prevented from being developed.</p>	<p>Amendments to the policy have reduced the anticipated minimum density figures for infill developments to 70-85dpa, and it accepts that on constrained sites it may only be possible to achieve between 50 and 75dpa. It also introduces the opportunity for this to be considered flexibly where evidence supports an alternative approach.</p> <p>The importance the delivery of housing has in meeting Crawley's housing need as the Plan period progresses, and the reliance on smaller infill sites increases, provides strong justification for ensuring these sites are maximised for their efficient use of land, subject to offering high quality design and environmental credentials, constituting sustainable development and meeting the requirements of the Local Plan policies. This policy compliance should be reflected in the price of land.</p>
REP153/480	Home Builders Federation	Policy CD10	<p><b>Inclusive design</b></p> <p>Footnote 46 of the NPPF (page 39) states that "<i>Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need</i>". As such the Council must ensure that their policy is meeting an actual and evidenced need. We would question whether the evidence supports all new homes being built to part M4(2) standards as is required by policy CD10 and is unjustified. The Council state that the number of people over 65 are expected to increase by 55% and that 30% of households</p>	<p>The Strategic Housing Market Assessment has recently been updated. The evidence established by this confirms that it is appropriate and justified for new housing to be delivered to meet Part M4(2) accessible and adaptable home standards. New housing in Crawley will, from now, only ever form a small amount of the housing stock and on this basis it is believed all of this should offer the opportunity for adaptability and accessibility.</p> <p>This will form a key element of the Viability</p>



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			contain at least one person with a long-term health condition or disability. Whilst we would not disagree with these figures it is unlikely that all people over 65 or those with a long-term health problem or disability will need a more accessible home and the Council should not assume that they will. This would appear to be supported by the English Housing Survey which found that in 2014-15 only 9% of all households in England that had one or more people with a long-term limiting disability actually required adaptations to be made to their home. It would appear that for the majority of households a home built to part M4(1), the mandatory standard, will be sufficient to meet their needs now and in later life.	Assessment of the costs of the Whole Plan policies. Concerns for viability impacts should only occur where this requirement has not been factored in early enough into the schemes design, as much of the Building Regulation requirements associated with this standard are easily achieved at minimum cost in the early stage of design and layout. It is acknowledge this may not be possible for all developments and the Policy sets out the anticipated exceptional circumstances for this. Policy CD10 (now DD3) is not only concerned with simply the numbers of evidenced occupancy needs/homes required by older people as well as those with a long-term health condition or disability. It is also relating to the ability for all people to visit any building with dignity. On this basis, the supporting text to this policy has been amended to clarify this.
REP155/500	West Sussex County Council	Para. 4.32	<p><b>WSCC Highways</b></p> <p>To help with clarity there are a number of suggested amendments to paragraphs and policies: <b>Paragraph 4.32 criterion 1 (Transport – Rail):</b></p> <p>To aid clarity, it is suggested that criterion 1 is amended to read – <b><i>Two of the best rail stations south of London, in terms of connectivity:</i></b></p> <ul style="list-style-type: none"> <li>• <b><i>frequency of services,</i></b></li> <li>• <b><i>journey times / express services;</i></b></li> <li>• <b><i>number, variety and desirability of destinations served</i></b></li> </ul> <p><b><i>being Gatwick Airport and Three Bridges;</i></b></p>	Agreed: amendment made.
REP155/501	West Sussex County	Policy CD9	<p><b>WSCC Highways: CD9 Crossovers</b></p> <p>There is concern that any ‘vehicle crossovers’ could result</p>	Comment noted. The policy seeks to cover this concern.

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	Council		in a loss of public on street parking as it will effectively create private parking spaces.	
REP162/556	Sussex Ornithological Society	CD4b	<p>It is notable that borough councils across the country are finding that they are having to resort to building upwards rather than outwards, with perhaps Croydon being an obvious, and apparently commercially successful, example. The SOS believes that Crawley Borough has reached this point too, and needs to now plan to build upwards rather than outwards.</p> <p>We feel that if Crawley, and other Local Authorities who are running out of land, do not build upwards the whole of West Sussex outside the SDNP will become urbanised in the next 30 years. That would cause a massive loss of habitats and biodiversity, and have a massive impact on birds.</p> <p>8. So at the very least we would expect to see in the Crawley Local Plan :</p> <ul style="list-style-type: none"> <li>- a proposal showing how all 11,281 new dwellings can be accommodated within Crawley through the higher density building of homes</li> <li>- any problems caused by such a proposal being highlighted</li> <li>- and to show how they would be addressed</li> <li>- those problems being compared to the problems, including loss of biodiversity, caused by building overflows in adjoining authorities.</li> </ul> <p>We believe that Crawley should be putting forward a Local Plan that will meet the NPPF guidelines of achieving a net increase in biodiversity (see 16 to 18 below). Overflowing into areas rich in biodiversity is not the solution and will only cause an inevitable loss in net biodiversity, which is contrary to NPPF guidelines.</p> <p>9. Because of the above, we believe that <u>Policy CD4b</u> proposes inappropriately low housing densities given what</p>	<p>Disagree: Policy CD4b (now CL5) includes challenging minimum densities. Notwithstanding this, decisions made in relation to any matter related to overall form have to be based on various parameters. There is no simple formulaic answer. Each site needs to be considered on its own merits and take the entirety of the development plan into account. A blanket roll out of development form based on minimal densities will rarely be appropriate.</p> <p>Foundational policy regarding development form, includes policies CL1 to CL5 (inclusive) e.g. limitations on densities will occur in areas where forms is tailored to meet policy requirements regarding noise pollution, conservation area designations, and the parameters/ restrictions dictated by the adjoining form and character of the surrounding context.</p> <p>All development will be required to secure biodiversity net gain (Policy GI2).</p> <p>The quantum of housing need in Crawley is such that it cannot all be met sustainably on appropriate sites within the borough, and some unmet needs will therefore be met by neighbouring councils. The location of development outside of Crawley's administrative boundaries is a matter for consideration by the neighbouring authority within which it falls, and ensuring net gain of biodiversity is achieved will form part of the considerations undertaken</p>

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			such a policy means for the rest of Sussex.	through appropriate Sustainability Appraisals etc. associated with the neighbouring Plans.
REP174/619	Gatwick Airport Limited	Policy CD7	<p><b>Chapter 4 Character and Design</b>  <b>Policy CD7 – Aerodrome Safeguarding</b>  <b>Consultation Question - 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?</b></p> <p>The entire catchment of Crawley Borough Council falls within the aerodrome safeguarded zone therefore the inclusion of a standalone policy for technical aerodrome safeguarding is justified and wholly supported by GAL. Often developers are unaware of the need for aerodrome safeguarding thus the inclusion of Policy CD7 specifically serves to identify the need for developers and planning practitioners to consider aerodrome safeguarding concerns at the pre application stage for new proposals in the vicinity of the airport. The inclusion of Policy CD7 way will provide greater clarity for developers on the requirements for proposed developments within the 15km aerodrome safeguarded zone surrounding the airport, thereby ensuring new schemes are designed and constructed in accordance with the technical aerodrome safeguarding requirements and will not pose a risk to the continued safe operation of the airport aerodrome.</p> <p>Aerodrome safeguarding is a legal requirement of both the International Civil Aviation Organisation and the European Aviation Safety Agency and is embedded in the Town &amp; Country Planning process by way of ODPM/DfT circular 01/2003 'Safeguarding of aerodromes &amp; military explosives storage areas' Direction 2002. The inclusion Policy CD7 would therefore satisfy the specific requirements of</p>	Noted and support welcomed (now Policy DD6).

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			<p>Technical Safeguarding Circular 01/2003 (Annex 2 para 28) for the inclusion within local plans of an aerodrome safeguarding policy.</p> <p><b>Consultation Question - 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?</b></p> <p>GAL considers that standalone policy for aerodrome safeguarding should highlight to developers the opportunity for early engagement with the airport with regard to aerodrome safeguarding matters. When developers consult with the airport operator it often serves to assist in making the planning process more expedient for all parties. GAL therefore encourages developers to be referred in the Policy CD7 to both the Local List and to the airport at gal.safeguarding@gatwickairport.com so that GAL can advise on planning applications in the vicinity of the aerodrome. For greater general awareness the AOA (Airport Operators Association) safeguarding advice notes available at <a href="http://www.aoa.org.uk/policy-campaigns/operations-safety/">www.aoa.org.uk/policy-campaigns/operations-safety/</a> could also be referenced in the draft Plan Policy CD7.</p> <p>GAL suggests the following amendments to the wording of Policy CD7 to ensure the appropriate level of specific detail is required by the proposed policy text:</p> <p><b>Proposed Amendment to Policy Wording CD7 Aerodrome Safeguarding</b></p> <p>There is an error in the first line of the Policy text which GAL suggests is amended as follows:</p>	<p>Noted. It is agreed that it would assist applicants to include this information within the Local Plan, similar to the approach used in the Manor Royal Design Guide SPD. Additional text has been added.</p> <p>Noted. Text has been amended to remove this error.</p>

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			<p>'Development will only be supported if it is consistent with the continued safe operation of Gatwick airport <b><i>will be supported</i></b>'.</p> <p>In the second paragraph, second sentence, of Policy CD7 the policy states that: <i>'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'</i>.</p> <p>GALs considers that the policy wording should be amended to include structures and other safeguarding matters, as follows: <i>'Statutory consultation responses may require that restrictions placed on the height or detailed design of buildings/structures to avoid impacts on the airport aerodrome including those relating to navigational aids or on developments which may increase the birdstrike risk, create building induced turbulence or include lighting that could pose a hazard to the safe operation of the airport aerodrome.'</i></p> <p>GALs also considers that the policy wording should be amended to include (following the final policy paragraph) the additional policy text: <i>'Developers should refer to the Local List and also consult with the airport at gal.safeguarding@gatwickairport.com for advice on planning applications in the vicinity of the aerodrome.'</i></p> <p><i>Developers should refer for general awareness to the AOA (Airport Operators Association) technical aerodrome safeguarding advice notes available at <a href="http://www.aoa.org.uk/policy-campaigns/operations-safety/">www.aoa.org.uk/policy-campaigns/operations-safety/</a></i></p> <p><b>Proposed Amendments to Supporting Text Policy CD7 -</b></p>	<p>Noted. Additional wording has been added to the Policy (now Policy DD6).</p> <p>Noted. The suggested wording has been added as additional text to the Policy DD6 Reasoned Justification.</p> <p>Noted. Supporting text and Reasoned Justification has been revised in response to the suggested amendment.</p>

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			<p><b>Aerodrome Safeguarding</b>  <b>Proposed Amendment to Supporting text Para 4.62.</b>            GAL believes that the supporting text in para 4.62 describing aerodrome safeguarding should be amended as follows:            ‘The adopted Local Plan does not currently include a policy in relation to Gatwick Airport Aerodrome Safeguarding but a recent study has suggested that the awareness of the requirements for consultation with airports on planning applications is inconsistent.            The text below sets out how Paragraph 4.63 and new text to be inserted in <i>italics</i>.  <i>‘Aerodrome safeguarding is the process used to ensure the safe and efficient operation of airports and protects aircraft and passengers while taking off and landing or flying in the vicinity of the airport which in turn ensures the safety of people living and working nearby. Aerodrome safeguarding is a legal requirement by way of ICAO (International Civil Aviation Organisation) &amp; EASA (European Aviation Safety Agency) and is embedded in the Town &amp; Country Planning process by way of ODPM/DfT circular 01/2003 ‘Safeguarding of aerodromes &amp; military explosives storage areas’ Direction 2002.</i>  <i>Aerodrome safeguarding differs to the principle of safeguarding land for a possible additional runway to the south at Gatwick Airport instead it relates to how a development it could impact on safety. Aerodrome Safeguarding assesses for example the height and design of the proposed development or construction equipment such as cranes which could create a potential risk to the airport aerodrome through impacts on radar or building induced turbulence. It also considers the potential risks to</i></p>	<p>Noted. Text has been amended as suggested.</p>

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			<p><i>aviation created by large landscaping schemes, lighting designs and new water bodies which could attract birds hazardous to aviation.</i></p> <p><b>Proposed Amendment to Supporting Text Para 4.63.</b> GAL considers the need for the amendment to the text of para 4.63 by the removal of the first sentence of the supporting text as the draft Plan has stated that Gatwick Airport is a 'licensed aerodrome', which is technically incorrect as Gatwick is now EASA certified. Para 4.63 needs to be amended as follows: Gatwick Airport is a 'licensed aerodrome' to be replaced with: <i>'Gatwick Airport is an EASA certificated aerodrome'.</i></p> <p><b>Proposed Amendment to Supporting Text Para 4.65.</b> GAL supports the text in paragraph 4.65 and specifically the signposting of the Aerodrome Safeguarding Map. However, GAL does seek that the Local Plan Map is amended to clearly identify that the entire borough is within the Aerodrome Safeguarding Map.</p> <p><b>Additional comments to Policy CD7</b> GAL believes further supporting text is required for Policy CD7 to highlight that the national policy requirement for the safeguarding of land which would be needed to develop the airport in the future also results in a need to safeguard both the existing and extended future aerodrome from inappropriate development. GAL therefore considers that as land is currently actively safeguarded from development it is also necessary to identify in the supporting text of Policy CD7 the need to safeguard the current operation and potential <i>future</i> aerodrome operation.</p>	
REP174/620	Gatwick Airport Limited	Policy CD8	<p><b>Policy CD8 Advertisements</b></p> <p><b>Consultation Question - Is the new policy for</b></p>	Noted and support welcomed.

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			<p><b>advertisements helpful?</b> GAL supports the inclusion of Policy CD8 (e) as it identifies the important need for aerodrome safeguarding to be considered and is in the interests of ensuring new advertisements are designed as not pose a risk to aviation safety.</p>	
REP174/622	Gatwick Airport Limited	Policy CD4	<p><b>Chapter 4 – Character &amp; Design</b> <b>Policy CD4 Effective Use of Land</b> <b>Consultation Question - Are there areas in Crawley which should be protected from high density development?</b> GAL considers that noise sensitive development should not be located in high density areas where there is the potential for future residents to be exposed to an unacceptable level from noise from aircraft. High density development should also consider the requirements of aerodrome safeguarding to ensure new proposals do not pose a risk to the safe operation of the airport aerodrome.</p> <p><b>Proposed Amendments to Policy CD4 (b)</b> GAL considers that the following additional points should be included within the text of Policy CD4 (b): The text below sets out how new text to be inserted in <i>italics</i>.</p> <ul style="list-style-type: none"> <li>• <i>Policy CD4 (b) vii - noise sensitive development will not be permitted at high density locations areas where there is an unacceptable level of exposure to noise from aircraft</i></li> <li>• <i>Policy CD4 (b) viii - high density proposals must comply with the requirements of Policy CD7 Aerodrome Safeguarding.</i></li> </ul>	The Plan needs to be read as a whole and there are specific policies covering Development and Noise (EP4) and Aerodrome safeguarding (DD6).
REP175/638	Savills on		<b>Section 4: Character and Design</b>	Sustainability in relation to movement cannot be



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	behalf of St. Catherine's Hospice		<p>3.4. The importance of character and design in development is recognised nationally. Paragraph 124 of the National Planning Policy Framework (2019) set outs that it "the creation of high quality building and places is fundamental to what planning and development should achieve".</p> <p>3.5. The redevelopment of St Catherine's will integrate a higher density residential development within an existing residential neighbourhood which is considered sustainable due to its location in proximity to local facilities. Policy CD1 recognises that higher density developments, such as Malthouse Road, may be compatible with an existing neighbourhood structure. The use of the word 'may' in this context creates a vague policy that does not promote such forms of sustainable development. It is recommended that this policy is reworded to truly promote the benefits of higher density developments within sustainable neighbourhoods.</p> <p>3.6. Emerging Policy CD3 highlights the need for development proposals to be based on a thorough understanding of the site and the wider context, including: views, landmarks, nature conservation assets etc.; heritage assets; locally distinctive patterns of development; and, their surroundings.</p> <p>3.7. The reasoned justification for the policy demonstrates that it is based on paragraph 127 of the National Planning Policy Framework 2019 (NPPF). Whilst Policy CD3 reflects the NPPF's sentiment to achieve well-designed places, the emerging policy provides little flexibility to facilitate development at a greater density which could be considered out of character for the area and may challenge the status-quo in established neighbourhoods.</p>	<p>applied to the Malthouse road site as it is not within reasonable walking distance of an existing high capacity transport interchange. The closest Fastway stop is at least 15 minutes away. As a result there is a natural cap on the capacity for densification at this site as there is a risk that overly intensive development in such a location would only promote unnecessary car movements.</p> <p>Disagree: the point raised in relation to Policy CD1 (now CL1) is inconsistent with national policy. One size does not fit all where intensification is concerned.</p> <p>Decisions made in relation to any matter related to overall form have to be based on various parameters. There is no simple formulaic answer. Each site needs to be considered on its own merits and take the entirety of the Local Plan into account. A blanket roll out of development form based on minimal densities will rarely be appropriate.</p> <p>Foundational policy regarding development form, includes policies CL1 to CL5 (inclusive) e.g. limitations on densities will occur in areas where form is tailored to meet policy requirements regarding noise pollution, conservation area designations, and the parameters/ restrictions dictated by the adjoining form and character of the surrounding context.</p> <p>The emerging policy provides flexibility to facilitate development at a greater density which could be</p>

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			<p>3.8. This is in conflict with the NPPF, notably where it states that planning policies should ensure that developments are <i>“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)”</i> (emphasis added). It also conflicts with part J of Policy CD2 requires new development to consider flexible development forms that can respond to changing conditions.</p> <p>3.9. The shift in CBC’s housing strategy towards densification and the redevelopment of previously developed land (PDL) is not apparent in Policy CD3. To align the draft Local Plan with the NPPF, local character and design policies in Crawley should be reworded to actively encourage and facilitate well-designed, high density new development and highlight the opportunities of redeveloping PDL.</p> <p>3.10. Planning Practice Guidance states that “characterisation studies and design strategies, dealing with issues such as urban form, historic character, building typologies..” can assist when establishing appropriate densities in site (ref: 66-004-20190722). In accordance with this, the emerging Local Plan references new Area Wide Character Assessments. St Catherine’s Hospice would appreciate the opportunity to comment on the development of any character assessments relating to the site once they are made public.</p> <p>3.11. Policy CD4 (b) promotes the effective use of land in terms of layout, scale, appearance and public realm. All new developments must meet criteria listed i. - vi. in this policy. Little flexibility is given to different circumstances that might occur throughout the borough and therefore is not</p>	<p>considered out of character for the existing context. Amendments have been made to clarify the council’s position.</p> <p>This policy and many others positively encourages challenging the status quo in established neighbourhoods.</p> <p>The emerging policy encourages new development and intensification across the borough and encourages creativity and flexibility in this regard. However, and consistent with national policy, there are also many constraints and each site must be judged on its own merits. Each new development has to have a site specific response.</p> <p>It is also the case that more universal considerations and parameters can apply to and direct the form of development within entire districts. See answer above in relation to point 3.5 as an example.</p> <p>The Urban Design SPD is to be updated following the Local Plan Review.</p> <p>The Local Plan includes housing typology policies (Policies H3/H3a-g) which explicitly highlight the support the council offers to encourage a wide range of sites to come forward through the plan period.</p> <p>The St. Catherine’s site has been allocated specifically in Policy H2 as a Housing for Older People site.</p>

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			<p>consistent with paragraph 11a of the NPPF and therefore the heart of the entire framework.</p> <p>3.12. Key density categories are also outlined within Policy CD4 (b). The densities range from 95-130 dwellings per hectare to 180 - 300 dwellings per hectare. The densification of the borough is thoroughly supported and the development at St Catherine's will encompass this into the proposals. The Council should promote the use of brownfield/previously developed land throughout this policy whereas currently, it is only mentioned as part of the highest density categories.</p> <p>3.13. To support intensification within the built-up area boundary, CBC could look towards other constrained Boroughs to understand other methods for encouraging development in Crawley. Notably, Croydon Borough Council published a Suburban Design Guide in April 2019 which emphasises the capacity to boost housing supply by increasing the density and massing across small sites.</p> <p>3.14. The regeneration of previously developed, low-density sites, like St Catherine's Hospice, should be explicitly supported in the draft Local Plan to encourage small and medium sites to come through the planning process.</p>	
REP177/648	The Woodland Trust	Policy CD3	<p><b>Character &amp; Design</b></p> <p>Policy CD3 – We welcome the policy that existing trees, green spaces, and hedges, should be integrated, protected and enhanced in new developments. Integrating trees and green spaces into developments early on in the design process minimises costs and maximises the environmental, social and economic benefits that they can provide. We recommend the guidance published by the Woodland Trust <i>Residential developments and trees - the importance of trees and green spaces</i> (January 2019). We further</p>	<p>Support noted.</p> <p>Reference has been made to the Guide in the Local Plan as part of the supporting text to Policy DD5, which specifically relates to tree planting and residential development.</p> <p>The council is not currently pursuing a target tree canopy for the borough, as tree planting may not always be the best form of landscape planting. However, the tree replacement policy (Policy DD6</p>

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			recommend adding that a target tree canopy cover of at least 20 per cent will be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease in line with policy LC4 and by new planting to support green infrastructure.	(previously LC4) acknowledges the impact of the loss of a mature tree and its replacement with a younger tree; hence the proportionate approach between the lost tree's girth and number of replacement trees required.
REP177/649	The Woodland Trust	Policy CD6	Policy CD6 – We welcome the policy section d) to retain existing individual or groups of trees that contribute positively to the area and allow sufficient space for trees to reach maturity. Trees can play a significant aesthetic role helping integrate new developments into existing ones and creating a local identity. We welcome the policy to ensure that trees that make a contribution to the street scene are not at risk of being removed (section 4.58). Integrating trees and green spaces into developments early on in the design process reduces the risk of tree removal. We recommend the guidance published by the Woodland Trust <i>Residential developments and trees - the importance of trees and green spaces</i> (January 2019).	Support noted.  As above, reference has been made to the Woodland Trust Guide in the supporting text to Policy DD5. Amendments to Policy CD6 (now DD2) have clarified the importance of preserving trees and soft landscaping in accordance with Policy DD5 as an integral part of the layout.
REP184/709	Sussex Wildlife Trust	Policy CD1	Section 4 – Character & Design Strategic Policy CD1: Neighbourhood Principles Whilst SWT understands why CBC wishes to encourage development within neighbourhoods, we feel it should be clarified that this development is not a 'special case' and must align with the other policies within the plan. We therefore recommend the following addition: <b><i>c) encouraging development unless it would result in local facilities and services which help meet the day-to-day needs of residents being lost or conflicts with other policies within the plan.</i></b>	Agreed: amendment made.
REP184/710	Sussex Wildlife Trust	Policy CD2	Strategic Policy CD2: Making Successful Places: Principles of Good Urban Design Paragraph 127 of the NPPF makes it clear that policies	Agreed: amendments have been made accordingly.

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			<p>should ensure developments use appropriate and effective landscaping and are sympathetic to the surrounding landscape setting. Additionally, paragraph 171 states that plans should take a strategic approach to enhancing networks of habitats and green infrastructure. Therefore SWT feels that policy CD2 needs to be more assertive about the link between high quality green infrastructure and good urban design. We recommend the following additions: To assist in the creation, retention or enhancement of successful places in Crawley, development proposals will be required to:</p> <ul style="list-style-type: none"> <li>a) respond to and reinforce locally distinctive patterns of development, urban and landscape structure and character and protect and/or enhance <b>environmental and</b> heritage assets;</li> <li>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);</li> <li>c) make places that are permeable <b>for people and wildlife</b> 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;</li> <li>d) provide recognisable routes, intersections and landmarks to help people find their way around, places that are legible and easy to read;</li> </ul>	

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			<p>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;</p> <p>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;</p> <p>g) create public spaces and routes that are attractive, safe, uncluttered and which work effectively for all in society, including disabled and elderly people;</p> <p>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</p> <p>i) orientation, solar gain and aspect, including the path influences of the daily sun and the location of habitable rooms <b>and green infrastructure</b>;</p> <p>j) consider flexible development forms that can respond to changing social, technological and economic conditions; and</p> <p>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.</p> <p>Applications must include information that demonstrates that these principles would be achieved, or not compromised, through the proposed development.</p>	
REP184/711	Sussex Wildlife Trust	Policy CD3	<p>Strategic Policy CD3: Local Character and design of new development</p> <p>As for policy CD2, SWT feels there should be a clearer</p>	Agree: amendment made accordingly.

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			reference to the contribution that new development can plan in protecting and enhancing the Borough's ecological network (NPPF paragraph 171). We therefore recommend the following addition: 1) Development proposals: a) respond to and reinforce locally distinctive patterns of development and landscape character and protect and/or enhance <b>environmental and</b> heritage assets:	
REP184/712	Sussex Wildlife Trust	Policy CD6	Strategic Policy CD6: Normal requirement of all new development. Given the requirements within the NPPF for all development to produce a net gain in biodiversity (paragraph 170) and the reference to this in the plan Vision, SWT believes that the following additional bullet point is required to ensure that applicants are clear of their obligations when forming proposals: <ul style="list-style-type: none"> <li>Retain existing green infrastructure and biodiversity features/assets to ensure continued connectivity and function and deliver a net gain to biodiversity. This should be considered at an early stage of the proposal design process.</li> </ul>	Agreed – amendment made accordingly (now DD1).
REP184/713	Sussex Wildlife Trust	Policy CD8	Non-Strategic Policy CD8: Advertisements Paragraph 180 of the NPPF states that planning policies should ensure that new development limits the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. Whilst policy CD8 does consider that advertisements can result in lighting impacts, this is not in relation to nature conservation. For clarity, we recommend the addition of a further bullet point to this policy to ensure conformity with the NPPF: <ul style="list-style-type: none"> <li>The potential impact on light sensitive species and</li> </ul>	Agreed – amendment made accordingly (now DD7).

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			associated habitats.	
REP185/737	Carter Jonas on behalf of Homes England	Policy CD5	<p><b>Policy CD5: Local Design Standards</b></p> <p>This policy highlights the need for the preparation and use of Area Wide Character and Character-Specific Design Assessments, and this cross references to Policy LC5 which Homes England have already provided comment on. A considerable strength of Homes England is its ability to act as a master developer and through governing the scheme from start to finish, can ensure a commitment to the highest quality of design. This approach was viewed positively and supported for the Northern Arc at Burgess Hill and consisted of a close working relationship with Mid Sussex District Council to bring the previously stalled site forward. Homes England is however concerned that the requirement to provide an Area Wide Character and Design Assessment to inform local urban design framework plans and development briefs, plus the preparation of detailed three-dimensional masterplans, is too onerous.</p> <p>Also, whilst it is noted that the Council would be responsible for the preparation of the Area Wide Character and Character-Specific Design Assessments, and that consultants may work with the Council to produce the documents jointly, Homes England does not consider that this is best use of the Council's resources and it should be for the landowner or developer to lead on the completion of these assessments.</p> <p>There is also ambiguity about the wider use of Area-Wide Character and Design Assessments (paragraphs 4.19 and 4.20). Homes England considers that these have a role, but only for larger developments. Given the resource challenges facing the Council, Homes England considers these are un-necessary for Crawley as a whole and simply</p>	<p>Crawley Borough Council will be bringing a programme forward, over time, of Area Wide Character and Design Assessments. However, we welcome developers supporting us in their delivery.</p> <p>Agreed in part. This policy and the preceding three Polices have been significantly amended and clarified.</p>



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			<p>would not be prepared, and this could delay development from coming forward.</p> <p>Homes England considers that the Council should require these only for larger developments. Homes England proposes therefore that Policy CD5 be amended to read as follows:</p> <p><i>“Strategic Policy CD5: Local Design Standards for Substantial Development</i></p> <p><i>For all new substantial development, Area Wide Character and Design Assessments must be prepared because these are essential and foundational. Development proposals will be expected to be informed by them and respond to them. In particular, these should provide an indicative, but flexible vision for future development form.</i></p> <p><i>Masterplans should be prepared which:</i></p> <ul style="list-style-type: none"> <li><i>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);</i></li> <li><i>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;</i></li> <li><i>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;</i></li> <li><i>d. The scale and size of buildings, appropriate to both its function and the areas existing character, adjoining built context.</i></li> </ul> <p><i>Proportionate to the scale of development, employ design tools such as 3D digital modelling to assess the quality of new spaces and structures and retained character elements</i></p>	

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			<p><i>to accurately test and explore options, in particular from key points (see 'c' above) from a realistic street level position / social line of vision.</i></p> <p><i>The applicant should prepare the Area-Wide or Character-Specific Design Assessments in consultation with the Council and this should form part of a submitted Design and Access Statement.</i></p>	
REP186/759	CPRE Sussex	Policy CD4	<p><b>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?</b></p> <p>We agree with para 4.28 that 'Building at higher densities not only makes more efficient use of land but can also deliver higher quality.' Good design is critical in ensuring a successful high density development. We also agree with para 4.25 that 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, for example by the use of minimum density standards for the town centre and other locations that are well served by high frequency, reliable public transport. Shunting Crawley's unmet housing need of approximately 6,475 dwellings into neighbouring authorities with open countryside does not represent sustainable development. We would like CBC to ensure that it has robustly assessed its capacity to meet as much of this development as possible within the built-up area boundary once the current call for sites has been completed, and that the updated Urban Capacity Study is part of the evidence</p>	<p>This policy along with CD5 has been significantly amended and clarified.</p> <p>Policy CD4b (now CL5) includes challenging minimum densities. However, the quantum of housing need in Crawley is such that it cannot all be met sustainably on appropriate sites within the borough, and some unmet needs will therefore be met by neighbouring councils. The location of development outside of Crawley's administrative boundaries is a matter for consideration by the neighbouring authority within which it falls as their Plans are developed and Sustainability Appraisals undertaken.</p> <p>All sites received during the Call for Sites have been assessed as part of the Strategic Housing Land Availability Assessment, and some new housing allocations have been made. Existing allocations have been reviewed and, on some, anticipated delivery numbers have been increased. There is an ongoing Open Space study assessing whether any are surplus, as well as the Brownfield Register which identifies potential brownfield sites within the borough.</p>

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			pack in the next stage of consultation.	
REP188/775	Turley on behalf of Rainier Developments	Policies CD1- CD6 CD10 & H3	<p><b>Policies CD1 – CD6, CD10 and H3</b></p> <p>2.9 The plan reflects the NPPF in seeking development to be of the highest quality design, specifically within Crawley Town Centre, and policies CD1 through to CD6, together with policies CD10 and H3, provide detailed guidance on best practice for design, layout, movement, sustainability and place making principles. In delivering high quality design within the Town Centre, these policies will assist in the continued growth and improvement in built form quality, aligning with the Council's proposed vision for Crawley to be a place which provides high quality leisure and cultural facilities and supporting health and wellbeing.</p> <p>2.10 Notwithstanding the above, Rainier consider that the level of detail set out across the various policies is considerable, with significant cross policy interaction, this at times results in repetition of design criteria. While it is appreciated that each policy deals with a different element of design, a number of the policies could be combined. Such amendments will be likely to assist in clarity for applicants, as well as assisting in the Council's application of policies when considering development proposals, ensuring they are consistent with NPPF paragraph 124 which requires policies to be clear about expectations.</p> <p>2.11 Furthermore, in accordance with the NPPF paragraph 57, it is important that the intentions of planning policies and their requirements do not impact upon the viability and deliverability of a development scheme which could bring significant benefits to the Borough.</p> <p>2.12 Reflecting on the emerging plan's vision for high quality design, the Design and Access Statement prepared in support of Rainier's application for the MOKA site</p>	These policies have been significantly amended and clarified.

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			<p>identifies a design led approach which seeks to assist in the creation of a vibrant mixed use area. It will assist in the creation of a new gateway and contribute to the ongoing urban regeneration of this part of Crawley. It represents the reuse of previously development land which is currently underused and in a declining state and will deliver a range of significant benefits, including a public pocket park, 152 new homes, and the provision of electric vehicle charging points and car club facilities.</p> <p>2.13 The proposed development responds to and reflects its immediate and wider environs, drawing on the New Town vernacular with the innovative use of materials and design aesthetics.</p> <p>2.14 At ground floor level, the two sides of the square will provide new commercial / retail units, with the aim of creating a lively, active frontage to the new green space / public square and Station Way, whilst providing high quality residential apartments above.</p>	
REP188/776	Turley on behalf of Rainier Developments	Policy CD4b	<p><b>CD4(b): Effective use of Land: Layout, Scale , Appearance and Public Realm</b></p> <p>2.15 Rainier welcome the minimum density ranges identified within the policy, as this will drive the delivery of higher density development where it is needed centrally within the town and assist in the much needed deliver of new homes. However, Rainier are concerned that identifying an upper figure in the high density category could artificially suppress the level of new homes which can be delivered at a given site, particularly in highly sustainable locations in close proximity to key transport nodes such as Crawley train and bus stations.</p> <p>2.16 It is also considered that identifying a 10 storey limit to new development is not necessary. Height will be controlled</p>	These policies have been significantly amended and clarified.

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			by the requirements of other policies such as Aerodrome Safeguarding (CD7) and the ranges of policies within the 'Character and Design' section of this plan, particularly those which seek for new development to reflect that which surrounds it. Rainer consider that the maximum height of a building should be guided by the wider policies within the Local Plan.	
REP188/777	Turley on behalf of Rainier Developments	Policy CD11	<p><b>CD11: Standards for all new dwellings</b></p> <p>2.17 Rainier agree that all new dwellings should be delivered in accordance with National Space Standards to create comfortable and sustainable living conditions. The proposed development has been designed in full compliance with these to create a high quality development which contributes to the unique character and identity of the town.</p> <p>2.18 Notwithstanding this, the second part of this policy goes on to promote higher space standard requirements than necessary. Rainier are concerned that this will not be the most efficient use of space for deliverable land particularly given the level of unmet housing need in Crawley.</p>	This policy has been significantly amended.
REP198/831	The Ifield Society		<ul style="list-style-type: none"> <li>• <b>What do you think is valuable about the areas you know in Crawley?</b></li> </ul> <p>Open spaces and accessibility to the open countryside, especially to the west of the town e.g. Ifield Brook Meadows, Ifield Wood and Ifield Golf Club – within the ancient Parish of Ifield, Crawley Greenway (especially in Ifield) (*Appendix I to 4 provided with original representation to support*)</p> <ul style="list-style-type: none"> <li>• <b>What is your neighbourhood's defining characteristics?</b></li> </ul> <p>A balance of urban development and a rural setting.</p>	<p>Comments received regarding Ifield neighbourhood, and Conservation Areas, are noted. These will be considered as part of the character assessments.</p> <p>Comments regarding protection of green spaces, wildlife areas and heritage is noted. The Local Plan policies seek to ensure this is the case through specific policies, e.g. CL8, HA1, HA2, OS1 and OS2, GI1, GI2, GI3 and GI4.</p>

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			<p>An area of heritage and character with a rich 1000-year history. Preservation of the West of Ifield Rural Fringe (Policy LC5) (see Crawley 2035 Map for Rural Fringe)</p> <ul style="list-style-type: none"> <li>• <b>What don't you like about parts of Crawley?</b> Litter. Over-development – 'boxed in' with an inability to 'breathe'. Homelessness. Ugly, boarded-up shops.</li> <li>• <b>Are there any places you think would be improved by change and new development?</b> Ifield Brook Meadows Local Green Space upgraded to Local Nature Reserve status (LGS to LNR) – to improve the community' health and well-being and discourage over-development <b>*Appendix 3 &amp; 4 provided with original representation to support*</b></li> <li>• <b>What makes higher density areas like St Peters Road and Brighton Road attractive?</b> Its preservation and protection as a Conservation Area.</li> <li>• <b>Where in Crawley should higher densities be allowed?</b> The Industrial Estate and areas previously safeguarded for airport and runway expansion.</li> <li>• <b>Are there areas in Crawley which should be protected from higher densities?</b> Its Conservation Areas, Local Green Spaces (e.g. Ifield Brook Meadows) and Parks – including the 'Buffer Zones' surrounding those protected areas (<b>*Appendix 1 and 3 provided with original representation to support*</b>)</li> </ul>	
REP205/910	Mid Sussex District Council	Policies CD4a and CD4b	<p><u>Efficient Use of Land and Built-up Areas</u> Mid Sussex supports policies CD4a and CD4b relating to making more efficient use of land. The Council recognises that Crawley considers it has an unmet need for housing, and welcomes the fact that Crawley is exploring mechanisms to increase housing supply, including the</p>	Support noted.

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			requirement for higher densities.	
REP/211/939	Natural England	CD6	<p><b>CD6 Normal Requirements of All New Development</b></p> <p>We support this policy's requirement to "retain positively contributing trees" as this helps maintain valuable Green infrastructure (GI) assets and key features of the existing ecological network. Which is in line with the National Planning Policy Framework (NPPF) (paragraphs 20. 91. 150. 171. &amp; 181.) and the Government's 25 year environment plan (chapter 3 section 3.i.).</p> <p>However we advise that, this policy could be used to strengthen requirements of new development to provide biodiversity net gains and Green infrastructure of later policies.</p> <p>This policy could also be used to introduce a requirement of developments to enhance the natural capital stock of Crawley, in line with the NPPF (paragraphs 170. &amp; 171.) and the Government's 25 year environment plan.</p> <p>This could be done by adding something akin to the following wording:</p> <p><i>"g) demonstrate how they will contribute to the multi-functional green infrastructure network while also delivering measureable and robust net gains in biodiversity as set out in policies GI1 and GI 2."</i></p> <p>See Annex A for further advice on Natural Capital:</p> <p><b>Annex A – Further Advice</b></p> <p><b>Natural capital</b></p> <p>Natural Capital is a concept which assigns monetary value to natural assets and the ecosystem services they provide, the value of natural capital assets can be from a physical products generated or the value of the service they provide. Natural capital assets can be any asset which is natural or semi-natural, from street trees to arable fields and even</p>	

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			<p>whole habitats such as a woodland.</p> <p>A single asset may generate is value from a number of sources; for example a woodland has a clear value as a timber product but while the woodland is growing it provides valuable services such as carbon sequestration, recreation, nutrient cycling and air/water quality management.</p> <p>Incorporating natural capital concepts into the Local Plan will enable more efficient communication of Crawley's needs to developers, using the most recent environmental planning terminology. Furthermore having a larger stock of natural capital assets will be only positive for Crawley and its residents/visitors.</p> <p>The requirement to incorporate natural capital into your Local Plan is driven by the NPPF in paragraphs 170. 171.</p> <p>As well as being a key concept within the Government's 25 year environment plan being ubiquitously mentioned throughout its length.</p>	



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REP22/059	Thames Water	5.18	<p>We support paragraph 5.18.</p> <p>We recognise the environmental benefits of trees and supports increased tree planting. However, in order for the public sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of the sewers or water pipes.</p>	<p>Support noted.</p> <p>For clarity, this paragraph has been repeated in the supporting text to the tree replacement policy (now Policy DD6).</p>
REP40/097	High Weald AONB Unit	LC6	<p>Thank you for your consultation on the above draft Local Plan. This response focuses on Policy LC6: High Weald Area of Outstanding Natural Beauty and the associated text and map.</p> <p>The current text of LP6 is supported insofar as it goes, but it is considered that it could go further in identifying the landscape components on the small areas of land in Crawley Borough that are in the AONB. In particular there are some areas of Ancient Woodland between Pease Pottage and the A264 and the areas further north-west form part of Buchan Park and include archaeological assets. The High Weald AONB Unit can assist with providing GIS information on these areas, but it is recommended that they are surveyed on foot for landscape, biodiversity and heritage characteristics that the policy could then refer to so that it goes beyond national AONB policy to be local distinctive to Crawley.</p> <p>The visual setting of the AONB to the east is largely shielded by the M23, however there are other impacts that could affect it such as watercourses and historic routeways. Again reference to these potential impacts of development outside the AONB on the designated area would help to make this policy more locally distinctive and easy to use.</p> <p>The policy should be supported by a detailed inset map showing the location of the AONB boundary relative to the Borough boundary and the AONB landscape components referred to in the policy. The map on</p>	<p>The location of the AONB in relation to the landscape character policy is provided in the small map under Policy CL8: Development outside the Built-Up Area Boundary. However, a more detailed insert map showing the location of the AONB boundary relative to the borough boundary, and including areas of ancient woodland has been inserted into the Plan.</p> <p>Policy relating to developments within the AONB is covered by Policy CL8 and CL9. More detailed assets would be considered against the other policies of the Plan in relation to landscape, ancient woodland, archaeological and biodiversity assets as part of planning application submissions.</p> <p>The surveying on foot for landscape, biodiversity and heritage characteristics would require specialist expertise.</p>

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			<p>p66 is too small scale to show this effectively. AONB Unit is happy to assist with this map.</p> <p>Lastly, the reference to the High Weald AONB Management Plan should be to the latest 2019-2024 version, the previous version is referred to on p208.</p> <p>The above comments are advisory and are the professional views of the AONB Unit's Planning Advisor on the potential impacts on the High Weald landscape. They are not necessarily the views of the High Weald AONB Joint Advisory Committee.</p> <p>(*Background Information Attached*)</p>	<p>Noted: the reference to the High Weald AONB Management Plan to the 2019-2024 version has been updated.</p>
REP97/256 (repeated below in 8. Infrastructure and 13. Green Infrastructure)	West Sussex County Council Asset Management and Estates Team	LC1	<p><b>1. Regarding Items:</b></p> <p>(6) The Oaks Primary School (9) Holy Trinity CE School (11) Our Lady Queen of Heaven School (13) Milton Mount Primary School (14) Oriel High School and The Brook School</p> <p>These sites are operational school playing fields under the ownership of West Sussex County Council. The fields are an integral and functional part of the schools. The Council, as Education Authority, has a statutory obligation to ensure that every child living in West Sussex is able to access a mainstream school in the county. Should there be a future requirement to create additional spaces at any of the schools in the planning area this would be in accordance with statutory obligations and a 'Biodiversity Opportunity Area' or 'Structural Landscaping' designation would serve to compromise the Councils ability to meet this need.</p> <p><b>We therefore wish to object to proposals that the school playing are included as a 'Biodiversity Opportunity Area' or as 'Structural</b></p>	<p>These designations have been carried forward from the adopted Crawley Borough Local Plan. They are based on factual evidence and studies undertaken to identify the existing character and purpose of the land.</p> <p>The requirements associated with the designations are set out in the existing and draft Policies (existing Policy CH7: Structural Landscaping &amp; Policy ENV2: Biodiversity; draft Policy LC1: Structural Landscaping &amp; Policy GI3: Biodiversity Sites).</p> <p>The council do not agree that these designations should be removed, or consider they compromise the county council's ability to meet the</p>

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			<p><b>Landscaping’, for the reasons set out above, namely that they are already protected due to their status, and that there may be a future requirement to increase the capacity of the schools to accommodate additional children.</b></p> <p>2. <b>Regarding Item (15)</b> Land to the south of Cheals Roundabout appears to be designated as a ‘Biodiversity Opportunity’ – please advise. This is held by West Sussex County Council on behalf of our highways department and therefore unavailable for an alternative allocation.”. It is land that is required to ensure that the road remains safe and can be well maintained. Future highways requirements are as yet unknown. However, we would be concerned if the land became unavailable for any necessary future improvements to take place due to the current designations”</p> <p>(15)The land to the north of Cheals roundabout appears to be designated as ‘Structural Landscaping’. Again, please advise and clarify. This land is also owned by WSCC, and is <b><i>being held to fulfil future strategic requirements.</i></b>(?)</p> <p><b>To resolve our concerns, we request removal of the areas of WSCC owned land known to the north and south of Cheals Roundabout (item 15) in Crawley from the proposed list of designated areas of Structural Landscaping or Biodiversity Opportunities as identified in the Local Plan.</b></p>	<p>needs for securing additional spaces at any of the schools in the planning area, or meet the needs of the Highways Authority. However, the policies are clear that development should not be at any cost and the existing character would need to be taken into account in the design and landscaping of proposals. In addition, the policies also support the government’s expectation for securing “biodiversity net gain”.</p> <p>The Biodiversity Opportunity Areas were identified originally by WSCC; now these are managed by the Sussex Biodiversity Record Centre across Sussex authorities.</p>

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REP152/467	Historic England	Policy LC1	<p>The interrelationship between Crawley’s historic development as a new town based upon development of distinct neighbourhoods and the green infrastructure and landscape of the town is well made in paragraph 5.6 on Structural Landscaping, but is not expressed explicitly in the Policy LC1: Structural Landscaping. While we support the broad intention of the policy, we believe it will benefit from inclusion of explicit mention of the significance and need to respect and plan for the conservation the historic landscape character of the town, which is at best only implied in the current drafting.</p>	<p>Policy LC1 (now CL6) has been updated to clarify landscaping makes a contribution to the development of the town and its neighbourhoods. However, it is not just the historic town landscaping that is important. The paragraph preceding the policy explains the historic relevant and origination to the structural landscaping.</p>

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REP152/468	Historic England	Policy LC2	We support Strategic Policy LC2: Important and Valued Views and the supporting reasoned justification that seek to protect views of heritage assets and within historic areas.	Support Noted.
REP152/469	Historic England	Policy LC5	Strategic Policy LC5: Development Outside the Built-Up Area would be improved and strengthened by reference to heritage assets and significances where appropriate; e.g. in bullet points ii, v and vi.	References made in policy.
REP155/520	West Sussex County Council	Policy LC6	<p><b>Countryside</b> WSSC own the Buchan Country Park which although in Horsham DC area is located in south east part of the CBC, bordering land to south of Broadfield in the High Weald AONB. Buchan Country Park is also referred to in the plan as the Country Park. Specific comments are as follows:</p> <p><b>Policy LC6 High Weald Area of Outstanding Natural Beauty:</b> Buchan Country Park is within the High Weald AONB and WSSC support the policy to include key requirements from the High Weald Management Plan.</p>	<p>Support for inclusion of key requirements from the High Weald Management Plan is noted.</p> <p>Reference is made to the need to have regard to the Management Plan in the policy. More detail has now been provided in the supporting text to this policy drawn from the Management Plan and advice from the AONB Unit.</p>
REP172/594	Vail Williams on behalf of Jersey Farm landowners	Policy LC5	<p><b>Landscaping &amp; Landscape Character</b> In regards to strategic policy LC5 “Development Outside the Build Up Area”, the inclusion of text within the Upper Mole Farmlands Rural Fringe and B Use Class development abutting Manor Royal is supported. We understand that this is to ensure that development proposals do not create, or are able to mitigate adequately, against visual intrusion and therefore this policy approach is supported. This policy also recognises the area as having an important role in maintaining the separation between Gatwick Airport and Crawley and identifies its valuable recreational links from the northern neighbourhoods into the countryside.</p> <p>The Consortium recognise the inclusion and the supported text that identifies the expansion of the opportunity for further development abutting Manor Royal and we understand that future development</p>	<p>Comments noted.</p> <p>This area is now designated for the preparation of the North Crawley Area Action Plan but, as Policy SD3 sets out, countryside policies continue to apply until the adoption of the AAP. The provision for minor extensions of Manor Royal is maintained within the AAP policy, provided they do not compromise future comprehensive development within the area. The implications on the character of this area and the importance of maintaining a gap</p>

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			<p>proposals will need to consider how they sit within the Upper Mole Farmlands Rural Fringe.</p> <p>We would also welcome the need for the text to recognise the permitted extensions to Manor Royal as achieved by our current planning application CR/2015/0435/FUL.</p> <p>However, for additional clarity, it would also assist if the supporting reasoned justification could identify any altered position, should safeguarding be lifted and the opportunity for urban extensions into the Upper Mole Farmlands Rural Fringe Area outside of the built-up boundary become suitable.</p> <p>Paragraph 5.26 recognises that any such extension in the countryside would need to be properly planned to ensure the important contribution of the rural landscape setting for Crawley's neighbourhoods is not lost, and the visual, spatial and environmental aspects of the landscaped setting is assessed.</p> <p>We believe that this has been successfully achieved with the existing planning application CR/2015/0435/FUL and will be demonstrated by the emerging planning application that has recently been submitted to Crawley Borough Council.</p> <p>The reasoned justification continues in paragraph 5.27 to explain that any sites which fall outside of the area subject to safeguarding in policy GAT2, will be considered favourably for minor extensions. This also identifies and introduces the issue of the search corridor for the western relief road, but also suggests that the land may potentially be suitable for employment floorspace. Further clarity on this point would be welcomed as the later policies appear to restrict such development within the identified boundary.</p>	<p>between the built up area of Crawley and Gatwick Airport will be considered as part of the work on the Area Action Plan.</p>

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			<p>The reasoned justification continues to state that development in these locations must be respectful of the adjoining countryside setting and ensure adequate landscaping, screening and design. The positive nature of this reasoned justification is therefore supported, and we believe that given the alignment of existing and proposed buildings this can be achieved.</p> <p>In addition, the final sentence of 5.27 states that where planning permission has been implemented, the built-up area boundary will be reviewed and any new development will provide a defensible new boundary, is also supported. This should therefore be considered in regard to the existing planning permission for 3 units and the submitted application for a single industrial unit at Jersey Farm, under this Local Plan Review.</p>	
REP177/650	The Woodland Trust	Policy LC2	<p><b>Landscaping &amp; Landscape Character</b> Policy LC2 – We welcome the commitment to protect and enhance existing tree planting in key linear views, and to require additional tree planting to screen new developments.</p>	Support Noted.
REP177/651	The Woodland Trust	Policy LC3	<p>Policy LC3 – We welcome the requirement for at least one new tree, or equivalent soft landscaping, for each new dwelling. We would further encourage the specification where possible of UK sourced and grown tree stock, to support biodiversity and resilience. Useful guidance on the integration of tree planting into new designs is available in the Trust publication, <i>Residential developments and trees - the importance of trees and green spaces</i> (January 2019).</p>	<p>Advice and comments noted. Amendments have been made to the supporting text to this policy (now Policy DD5), including reference to the Guide.</p> <p>The current Green Infrastructure SPD Appendix 6 lists appropriate tree species that can be planted in Crawley. CBC would welcome discussions when updating this list.</p> <p>The guidance on SUDs is helpful.</p>

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REP177/652	The Woodland Trust	Policy LC4	Policy LC4 – We welcome the clear policy in support of tree retention, with tree replacement as a last resort. We strongly welcome the proposed ratio of tree replacement, which reflects the Trust’s guidance on <i>Local Authority Tree Strategies</i> (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees. With reference also to policy GI1 on ancient woodland, where it is deemed that there is going to be unavoidable residual damage or loss to ancient woodland, the measures taken to compensate for this must be of a scale and quality commensurate with loss of irreplaceable habitat. Where ancient woodland is to be replaced by new woodland, this should aim to create 30 hectares of new woodland for every hectare lost.	Agree: Amendment has been made to clarify that Policy LC4 (now DD5) does not apply to ancient woodland and aged trees.
REP177/653	The Woodland Trust	Policy LC6	Policy LC6 –We would support including key requirements from the High Weald AONB Management Plan, in particular the vision for woodland set in objectives W1-W4, to ensure that the nationally-important assemblage of ancient woodland in the High Weald is managed in a sustainable way to maximise its wildlife, landscape and historical value.	Reference is made to the need to have regard to the High Weald AONB Management Plan in the policy, and its components are set out in the reasoned justification. This is considered to be proportionate and allows flexibility should the AONB Unit update the Management Plan.
REP181/695	Tim North & Associates on behalf of Holiday Extras	Policies LC1 & LC5	1. Policies LC1 and LC5 Landscape and Landscape Character The first series of policies which are directly affected by any decision relating to the same land are those relating to landscape and landscape character. To the extent that the same land could be made available for release for employment related purposes now to meet a current unmet need, or whether it is reserved for future airport expansion, dictates that landowners will have little incentive to carry out structural landscaping works or indeed undertake planting in the intervening period. In this way, those sustainability objectives relating to protection and/or enhancement of the landscape are unlikely to be	Green Infrastructure and its multiple benefits can be brought forward in a variety of ways and are essential to providing a net gain for new developments. The mental and physical benefits of a green landscape are to be acknowledged as part of future developments for the benefit of future generations. Through early consideration in the



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			<p>adopted by the respective landowners. In this respect, simply leaving the land in an unmanaged state does not equate to protection or enhancement of the landscape.</p> <p>Indeed, and as highlighted in the Sustainability Appraisal concerning the adoption of Option 3 relating to Policy EC1, maximising new opportunities within the Borough at the same time seeking the release of “<i>safeguarded land</i>” for employment generating purposes is more likely to have a positive impact on enhancing the environment than if Policy LC1 and LC5 are adopted.</p> <p>It follows that Policies LC1 and LC5 where they relate to the Upper Mole Farmlands Rural Fringe will not realise their intended objectives, but frustrate legitimate future development needs.</p>	<p>design stages, future developments can meet Policies LC1 and LC5. The Upper Mole Farmlands Rural Fringe area is now designated for the preparation of the North Crawley Area Action Plan but, as Policy SD3 sets out, countryside policies continue to apply until the adoption of the AAP. The implications on the character of this area and the importance of maintaining a gap between the built up area of Crawley and Gatwick Airport will be considered as part of the work on the Area Action Plan.</p>
REP184/714	Sussex Wildlife Trust	Policy LC1	<p>Section 5 Landscaping and Landscape Character.</p> <p>Strategic Policy LC1: Structural Landscaping</p> <p>SWT is supportive of the policy including wording that reflects the ability for biodiversity improvements to be delivered.</p> <p>The policy has a supporting map, however it does not clearly convey the types of habitats present that the structural landscaping is made up of. Section 5.8 of the justification for this policy also leans heavily towards wildflower meadow creation. While we are supportive of this, it is important the most appropriate landscaping is delivered based on the features and current value of the specific site. Therefore the justification wording should be broadened as follows:</p> <p>'5.8 To maximise multiple benefits of Structural Landscaping, <del>where appropriate</del> for <b>in line with and complementary to</b> the character of the area, these can also be designed and managed as <del>meadows</del> <b>species-rich habitat</b>. Wild flower meadows and flower-rich habitats <b>in</b></p>	<p>Support noted.</p> <p>Amendments made to supporting text, now para 4.72.</p>

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			<del>particular, such as meadows,</del> are crucial to supporting pollinators by providing good source of nectar and pollen throughout the summer and also shelter and nest sites. The council is committed to securing such enhancements wherever possible.'	
REP184/715	Sussex Wildlife Trust	Policy LC4	Strategic Policy LC4: Tree Replacement Standards SWT would recommend the following amendment to paragraph 5.20 to ensure there is proper recognition of the biodiversity benefits of trees: '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 <b>and biodiversity</b> . 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.'	Support noted. Amendment made (now para 5.41).
REP184/716	Sussex Wildlife Trust	Policy LC5	Strategic Policy LC5: Development outside built up area. Given its designation as a Local Wildlife Site (LWS), the presumption should be against any development within the Worth Way LWS. Additionally, given the valuable habitats it contains, any development within Tilgate Country Park must ensure the conservation and enhancement of biodiversity. This section of the policy should be amended as follows: 'Tilgate/Worth Forest and Fringes Proposals within Tilgate Country Park and Worth Conservation Area/ <del>Worth Way SNCI</del> should conserve <b>and enhance</b> their high landscape <b>and biodiversity</b> , value and potential for improved green infrastructure links to other areas.'	Amendments made (now Policy CL8)
REP185/736	Carter Jonas on behalf of Homes England	Policy LC5	<b>Strategic Policy LC5: Development Outside the Built-Up Area</b> This policy deals with development outside of the built-up area. One of the character areas that is identified is the "West of Ifield Rural Fringe" within which " <i>proposals which respect this area of locally special rural</i>	The council considers any development beyond the built up area should fully respect the character of the area in which it is

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			<p><i>fringe, its nature conservation and recreation value, its positive relationship with the urban edge and links to the wider countryside will be encouraged.”</i></p> <p>Whilst Homes England generally supports this policy and agrees that the location of new development should be carefully considered, the significant need for housing must also be addressed. The potential for a 16th new neighbourhood to extend Crawley has been considered for some time and the only credible location is on the west side of Crawley and yet this policy appears to undermine this potential.</p> <p>Specifically, Homes England considers that the policy should acknowledge the potential for stronger pedestrian and cycle links across this area to link any new development to existing communities. The following changes are proposed as underlined text to express support for <i>“proposals which respect this area of locally special rural fringe, its nature conservation and recreation value, its positive relationship with the urban edge and includes stronger pedestrian and cycle links between the edge of the existing settlement and connecting the development to the wider countryside will be encouraged.”</i> This suggested change is consistent with Homes England’s comments on Policy H3g x. and xiii which are set out later in this submission.</p>	<p>situated, and this includes the provision of access routes. The council strongly objects to the suggestion of a road link across Ifield Brook Meadows and Rusper Road Playing Fields which is a Local Green Space, designated as such due to its particular qualities in terms of nature, heritage, recreation, landscape, tranquillity and access to the wider countryside.</p>
REP186/760	CPRE Sussex	Policy LC6	<p><b>Policy LC6: High Weald Area of Outstanding Natural Beauty Consultation Questions:</b></p> <p><b>Should this policy include the key requirements from the High Weald Management Plan?</b></p> <p>We do not believe that ‘major’ development within the AONB is acceptable, unless in exceptional circumstances as set out in national policy and this should be made clear. We support the reference to the most recent High Weald Management Plan. We would like more detailed maps to be made available in the next round of consultation.</p>	<p>National policy regarding AONBs will apply. Reference is made to the need to have regard to the High Weald AONB Management Plan in the policy and the small area within Crawley is mapped which is considered to be proportionate.</p>

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REP188/778	Turley on behalf of Rainier Developments	Policies LC1 – LC2	<p><b>Policies LC1 – LC2</b></p> <p>2.19 Rainier support policies LC1 to LC4 in their approach to contribute to character, appearance and identity of Crawley. Such an approach is consistent with the overall approach to delivering high quality design within the wider Local Plan and expressed in national policy.</p> <p>2.20 The proposed development seeks to provide a ‘common relationship’ in massing and footprint to the buildings in the adjacent surroundings and is similar in character and form to the recently approved scheme along Station Way. It is considered that when viewed in the long range view, the proposed development will not be discernible from the wider built form within Crawley Town Centre, particularly given that careful attention has been paid through the design and pre-application process to ensure that the proposed development is seen as part of the wider redevelopment along Station Way.</p> <p>2.21 Furthermore, through the design process careful attention has been paid to the existing arboricultural life on site, and the proposed development incorporates an increase in the overall amount of trees and accessible green space within the site.</p>	Support noted.
REP188/779	Turley on behalf of Rainier Developments	Policies LC3 & LC4	<p><b>Policies LC3 and LC4</b></p> <p>2.22 While Rainier are supportive of the overall approach taken to enhancing built form through the provision of new tree planting, it is considered that the approach and standards set out within policies LC3 and LC4 are not sufficiently flexible to account for other landscape opportunities within a scheme.</p> <p>2.23 The proposed development will provide a new ‘pocket park’ and while it will include some new tree planting, it will also deliver a range of other new planting of varying sizes, including grass, shrubs, flowers etc.. The pocket park will also include seating and space for socialising</p>	A pocket park could provide a rich habitat for species and in that way contribute to soft landscaping. Awareness of the time for trees to mature and therefore contribute to decreasing carbon levels should be taken into account when acknowledging the girth of trees. Furthermore replacing an 80cm girth tree with 8 appropriate tree species will help the developer on meeting

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			<p>at a natural place of convergence along Station Way. It is considered that the provision of a pocket park in this location will enhance the physical and social landscape far beyond what the planting of only trees could achieve within the same space. However, the wording of policies LC3 and LC4 should be more flexible to take this into account.</p> <p>2.24 We agree that mitigation for the loss of trees is important however the number of replacement trees required by policy LC4 does not have full regard to the girth or maturity of the proposed replacement trees or the space within a site to provide replacement trees. In a sustainable town centre location (where the Council should be making most efficient use of developable land) the requirement to provide 8 replacement trees to mitigate the loss of 1 tree with a girth of 80 cm will require a significant area of land. There should be greater flexibility to the application of this policy, which would have regard to the girth and maturity of the replacement trees.</p> <p>2.25 Furthermore as currently worded these policies do not consider the viability implication associated with the proposed commuted sum for the cost of new and replacement tree planting which should be consider alongside other Section 106 contributions.</p>	its biodiversity net gain requirements. This policy will be subject to viability testing, as with all others in the Plan.
REP191/798	Quod on behalf of Aberdeen Standard Investments	Policy LC5	<p><i>Policy LC5: Is this policy still valid?</i></p> <p>The Site is identified as falling beyond the Built-Up Area Boundary and within the Upper Mole Farmlands Rural Fringe (Draft Policy LC5). The policy states that Class B development abutting Manor Royal (which should read Policy EC9 but is incorrectly identified as Policy EC3) within the Area of Search 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 area. Paragraph 5.27 states that where planning permission is implemented, the Built-</p>	Cross reference has been amended. This area is now designated for the preparation of the North Crawley Area Action Plan but, as Policy SD3 sets out, countryside policies continue to apply until the adoption of the AAP. The provision for minor extensions of Manor Royal is maintained within the AAP policy, provided they do not compromise future comprehensive development

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			<p>Up Area boundary will be reviewed and any new development should provide a defensible new boundary.</p> <p>There is no is robust evidence to support the continued airport expansion safeguarding and the policy should be deleted. This will release land to the north of Manor Royal for employment development to meet an unmet need.</p> <p>The general thrust of the policy is still valid as it seeks to maintain the separation between Crawley and Gatwick Airport where necessary, however amendments will be required in the light of other changes to the Draft Local Plan with regards to proactively identifying employment land to meet the substantial identified need.</p>	<p>within the area. The implications on the character of this area and the importance of maintaining a gap between the built up area of Crawley and Gatwick Airport will be considered as part of the work on the Area Action Plan.</p>
REP198/832	The Ifield Society		<ul style="list-style-type: none"> <li>• <b>What soft landscape features do you particularly value in Crawley?</b> Grass Verges Queens Square Water Fountains</li> <li>• <b>Are there areas of Crawley which would benefit from more trees and/or soft landscaping?</b> Three Bridges</li> </ul>	<p>Queens Square Water Fountain is identified as one of Crawley's Civic Spaces.</p> <p>Policy CL6, Structural landscaping, protects many verges across the borough. Three Bridges as an important node for transport but comment is noted.</p>
REP107/844	Town Access Group		<ul style="list-style-type: none"> <li>• <b>What soft landscape features do you particularly value in Crawley?</b> Trees – but please monitor problems caused by roots damaging pavements. Avoid by good planning, and take appropriate action when it occurs.</li> </ul>	<p>Hard pit planting as identified in the Green Infrastructure SPD may provide an appropriate method of directing tree routes and avoiding roots damaging pavements. However, most trees were planted before such technology was in existence.</p>

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REP/211/940	Natural England	LC3	<p><b>LC3 Tree and Landscape Character Planting</b></p> <p>We support the requirement that landscape proposals for residential developments add at least 1 new tree or equivalent soft landscaping feature, is a good way to ensure developments provide GI assets and enhance the existing ecological network, in line with the NPPF and Government's 25 year environment plan the Government's 25 Year Environment Plan</p> <p>However we advise, this requirement to provide at least 1 new tree should be expanded to all developments where practical to maximise enhancements.</p> <p>Furthermore, this policy should also be amended to support planting of native trees to better enhance the existing ecological network. We recommend incorporating the following wording.  <i>"...or equivalent soft landscaping, for each new dwelling, of an appropriate native species and planted in an appropriate location."</i></p>	
REP/211/941	Natural England	LC4	<p>We support the requirement for developments to retain and replace trees, as a good method to protect existing GI assets and preserve the existing ecological network, in line with the NPPF and Government's 25 year environment plan.</p> <p>We would advise that specific mention of veteran trees could be included within this policy to strengthen their protection.</p>	
REP/211/942	Natural England	LC6	<p><b>LC6 High Weald Area of Outstanding Natural Beauty</b></p> <p>We strongly support the requirements of this policy specifically ensure the qualities and features of the High Weald AONB are protected and enhanced by development.</p> <p>We recommend that this policy could make direct mention of the specific characteristics of the High Weald AONB and could directly reference the High Weald AONB management plan to help further support development which enhances the AONB.</p>	

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REP56/152	Sussex Gardens Trust	Policy HA6	<p>Thank you for notifying the Sussex Gardens Trust (SGT) of the above consultation. SGT is a member of the Gardens Trust, (a national statutory consultee), and works closely with the GT on planning matters. Representatives of SGT have reviewed the document and the Trust welcomes the inclusion of Strategic Policy HA6: Historic Parks and Gardens (as shown on page 76). Our comments on the questions posed on this section are shown below:</p> <p><b>Policy HA6: Historic Parks and Gardens Consultation Questions:</b></p> <p>→Is this policy justified and necessary? <i>SGT comment: Yes – locally listed parks and gardens (including those identified in the Crawley Local Plan) are “Non-designated Heritage Assets” and under the NPPF these are afforded the same protection as “Designated Heritage Assets” so this policy is essential.</i></p> <p>→Are the requirements set out in the policy proportionate to the significance of Crawley’s Historic Parks and Gardens as a heritage asset? <i>SGT Comment - Yes</i></p> <p>→Does the policy need to explain more clearly what is meant by ‘the historic setting and character’ of a Historic Park and Garden? <i>SGT comment it may be helpful to include a reference to the guidance issued by the Gardens Trust which may be found at <a href="http://thegardenstrust.org/wp-content/uploads/2016/10/Planning-System-in-England-and-Protection-of-Historic-Parks-and-Gardens-2016-v1.pdf">http://thegardenstrust.org/wp-content/uploads/2016/10/Planning-System-in-England-and-Protection-of-Historic-Parks-and-Gardens-2016-v1.pdf</a></i></p>	<p>Noted.</p> <p>Noted.</p> <p>Some slight amendments have been made to the policy text and para. 6.27 of the plan to link in more clearly with the NPPF definition of ‘heritage significance’.</p>



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REP96/253	Council for British Archaeology South-East	Para. 6.7/6.8	<p>In response to your request for comments/consultation on the new Crawley Local Plan, on behalf of the Council for British Archaeology South-East (which covers archaeology in Kent, Surrey and Sussex), I make the following observations on Section 6 – Heritage:</p> <p>1. The policies as presented concentrate on above ground heritage assets, such as standing buildings. There is little mention of buried cultural heritage assets, or archaeology in general.</p> <p>2. Sections 6.7/6.8 – Heritage Assets. Whilst separate policies are in place for dealing with historic buildings etc., there is a need to provide developers, owners and residents with further information, guidance and separate strategic policies for both <b>Scheduled Ancient Monuments</b> and especially <b>‘other assets’</b> which should be better defined (e.g. the range, nature and vulnerability of archaeological heritage assets). With regards to above ground buildings/structures, a need also to consider such assets as World War 2 remains and the need where appropriate to preserve or adequately record them.</p> <p>This is a good opportunity to highlight to you that since archaeological advice is no longer being provided by WSCC to West Sussex District and Borough councils, and advice is now sought from consultants on a case by case basis, <b>there is a lack of strategic coverage for archaeology in the Borough</b>. This situation is clearly evident from the Local Plan document – e.g. the inadequate summary statement in 6.2. ‘Stone</p>	<p>Policy HA7 has been added to provide specific coverage of archaeological heritage assets.</p> <p>Policy HA7 has been added to provide specific coverage of archaeological heritage assets.</p>

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			<p>(Neolithic) Age’ – what of the Palaeolithic and Mesolithic stone age periods? Are there not finds of flintwork of Mesolithic date (i.e. Middle Stone Age – i.e. earlier than Neolithic remains) from places like Tilgate? Were ‘Iron Age forts [were] established to extract ore in the areas now covered by Broadfield, Bewbush and Southgate’? Why is there no mention of the important <b>Roman</b> iron working industry, as revealed at places like Broadfield? What of Iron Age, medieval and any post-medieval iron works? (i.e. the iron working industry in the Crawley area is one of its distinctive cultural heritage/archaeological characteristics). In the future are the current Archaeologically Sensitive (Notification) Area designations/maps being reviewed and added to as necessary? How can we be sure that those areas outside such recognised areas do not contain important archaeological remains? What strategies/policies are in place to test these areas (e.g. desk-top studies and evaluations of ALL large developments) and to ensure adequate mitigations methods (including full excavation, recording and publication) where necessary? Do the presented policies for historic buildings include provisions for any ground or landscaping works in the curtilage of such properties? (i.e. there may be the buried remains of associated buildings, wells, rubbish pits, former garden features/layout, etc., in the vicinity of standing structures).</p>	<p>The introductory section to the chapter has been updated to expressly acknowledge these aspects of Crawley’s archaeology.</p> <p>Requirements for desk-based studies included in HA7.</p> <p>Cross referencing added to HA4 in respect of works in grounds of Listed Buildings.</p>
REP147/434	Surrey County Council	Para. 6.1 – 6.4	Our heritage comments reflect SCC’s position as archaeological advisors to Crawley Borough Council (CBC).	

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			<p><b>Heritage</b> We would strongly recommend revisiting the introductory section (paragraphs 6.1 – 6.4), which misunderstands the archaeology of the area and omits key periods including the Palaeolithic, Mesolithic, Roman and Medieval. CBC could consult SCC or the WSCC Historic Environment Record (HER) in order to have this section drafted more accurately.</p> <p>Part of the section also relies on the Borough's 2008 Heritage Strategy however, apart from providing HER access, this relationship with WSCC for archaeological advice has now been dissolved and advice is now sought from an external provider on a case-by-case basis. As a result, there is a lack of strategic coverage for archaeology; the Local Plan could be more robust on its archaeological position and policy statements to ensure the Borough remains compliant with national planning policy and guidance.</p>	<p>This has been redrafted to provide a more accurate summary of Crawley's archaeology.</p> <p>Policy HA7 has been added to provide specific coverage of archaeological heritage assets.</p>
REP147/435	Surrey County Council	Policy HA1	<p><b>Strategic Policy HA1: Heritage Assets</b> In order to set out the clear operation of the policy in practice, the policy itself should specify in what circumstances a Heritage Impact Assessment or an archaeological Desk Based Assessment would be required. It is also not made clear why Historic England "Level 2" is the minimum acceptable level of recording structures: this determination should be made on a case-by-case basis, and this level of recording is not appropriate for archaeological heritage assets - which is not clarified. In addition, Scheduled Ancient Monuments and Other Assets should be given their own specific archaeological policy to better</p>	<p>The policy text and Reasoned Justification in relation to recording have been amended to clarify that the recording level/scheme of investigation must be agreed with the council.</p> <p>Policy HA7 has been added to provide specific coverage of archaeological heritage assets.</p>

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			<p>accommodate their individual special requirements. This would provide clarity for developers and residents in line with Crawley's other Heritage Assets listed in the policy.</p> <p>In response to the five questions posed on p.71, our responses are as follows:</p> <ol style="list-style-type: none"> <li>1. Yes.</li> <li>2. Natural environment heritage assets such as Ancient Woodland, Veteran Trees and Hedgerows should be added to the list to ensure that should development proposals affect these features, they can be considered for their heritage value within written assessments, as well as their environmental contribution.</li> <li>3. The policy does not adequately reflect national planning policy as the archaeological coverage is thin and conflated with Heritage Impact Assessments.</li> <li>4. No comments.</li> <li>5. The requirements for the production of an archaeological assessment should be set out more clearly as we've outlined above and as they are in the validation documents.</li> </ol>	<p>Text added to the Reasoned Justification of HA1 acknowledging that Ancient Woodland/Veteran Trees can have or contribute to heritage significance and should be considered as part of HIA where appropriate, even though other strong protections may also be applicable.</p> <p>See additional policy HA7 in respect of archaeology.</p>
REP147/436	Surrey County Council	Policy HA4	<p><b>Strategic Policy HA4: Listed Buildings and Structures and Strategic Policy HA5: Locally Listed Buildings</b></p> <p>Strategic policy HA4 and HA5 both demonstrate a requirement to record Listed Buildings and Locally Listed Buildings to Historic England "Level 4" should demolition be proposed. However, similar to strategic policy HA1, further justification of this is required as</p>	<p>The policy text in each case has been altered to state instead that the scheme of investigation is to be agreed with the council and proportionate to the importance of the asset and the nature of the impact, in line with NPPF para. 199.</p> <p>Demolition of an unlisted building in a Conservation Area requires planning permission, CA consent no</p>

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			this is usually a determination that should be made on a case-by-case basis. In response to question 3 on p.76, there is no specific need to include Listed Buildings provisions where demolition is required as these can be dealt with through the Conservation Area process or Listed Buildings legislation and guidance.	longer applying in England. Provisions in respect of Listed Buildings have been amended to refer to 'substantial loss or harm' for consistency with the NPPF, enabling the decision-maker to weigh impacts in relation to the benefits or justification of a proposal.
REP147/437	Surrey County Council	Policy HA6	<b>Strategic Policy HA6: Historic Parks and Gardens</b> In response to question 1 on p.77, as Crawley has no nationally Registered Parks and/or Gardens, we would question whether this policy is necessary. Instead, we suggest that Strategic Policy HA3 could be amended and reinforced to include the class of locally-significant sites that Strategic Policy HA6 is designed to cover.	Noted. However, we believe that the ASLC designation and the Historic Parks and Gardens designation are sufficiently different to justify distinct policies. The risk of consolidating them into a combined policy is that the policy may either become too vague, or too unwieldy.
REP152/470	Historic England	Para. 6.1	Heritage Assets section – reference in paragraph 6.1 to 'English Heritage' should be to Historic England.	Amendment made – although the document in question pre-dated the change of name.
REP152/471	Historic England	Policy HA1	We support the broad intention of Strategic Policy HA1: Heritage Assets but suggest the following amendments to strengthen the purpose of the policy and better reflect the intentions of the NPPF:  Revise the final bullet point of the first paragraph to read Other <del>assets with</del> non-designated archaeological <del>interest</del> , assets of equivalent significance to scheduled monuments. <del>especially within Archaeological Notification Areas in Crawley identified by West Sussex County Council</del> to reflect NPPF paragraph 194 and footnote 63.  In paragraph 2 replace 'not lost' with <i>conserved and enhanced</i> to meet the test of NPPF paragraph 194.	Support noted.  The proposed text has been added as a separate bullet point, while retaining the last bullet point in order to include other non-designated assets with archaeological interest.  Para. 194 relates specifically to designated heritage assets, and relates to the justification of loss or harm to them. It is considered that the existing text is proportionate and consistent with the NPPF given that this part of the text relates to all heritage assets.

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			<p>Add in paragraph 3 final sentence <i>the National Heritage List for England</i> before 'Historic Environment Record'.</p> <p>Add to the end of paragraph 3 '<i>and other relevant sources of evidence about the significance of the assets affected, e.g. conservation area appraisals</i>'</p> <p>Add into paragraph 4 – 'If, in exceptional circumstances, <i>as defined by paragraph 194 of NPPF</i>, .....and it has been demonstrated <i>to achieve substantial public benefits that outweigh that harm or loss...</i>' to reflect the intention of NPPF paragraph 195.</p> <p>Final paragraph should be omitted as it does not reflect NPPF paragraphs 195 and 196, but can be substituted with the amendments above.</p>	<p>The detailed requirements for Heritage Impact Assessments have been reworked to take account of these amendments, in a way which we believe scans better than simply making these additions and is more consistent with the CBC Local List of Planning Requirements.</p> <p>This sentence has been reworked to have this effect, while bearing in mind that the section concerned is not just referring to designated heritage assets.</p> <p>We note this but consider that this should be retained (in a slightly reordered form, as now included in the Regulation 19 draft) since it concerns non-designated as well as designated assets, and so goes beyond paras. 195 and 196.</p>
REP152/472	Historic England	Policy HA2	We support policy Strategic Policy HA2: Conservation Areas but suggest adding 'and enhance' after 'preserve' in bullet vi.	Amendment made.
REP152/473	Historic England	Policy HA4	Strategic Policy HA4: Listed Buildings and Structures does not fully reflect the purpose or wording of NPPF paragraphs 194 and 195 with regard to the test for the loss or harm to listed buildings. The wording of the policy should be revised to more accurately reflect that of the NPPF, particularly in regard to achieving <u>significant public</u> benefits that outweigh the harm resulting from the loss of the significance of the asset related to the grading of the building.	Noted. This section of the policy has been redrafted to reflect more closely the approach of the NPPF.
REP152/474	Historic England		In our view, the Plan should contain a policy relating specifically to the identification, protection and	Policies HA3, HA5 and HA6 relate to these matters in what we consider to be an appropriate way as

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			<p>recording, where appropriate, of non-designated heritage assets as required by NPPF paragraph 197. This is particularly important in relation to archaeological resources that may be identified in the course of the planning or development of a site but that are currently unknown.</p> <p>We note with concern the lack of policies relating to the following key aspects of the historic environment:</p> <ul style="list-style-type: none"> <li>• How the plan will address particular issues relating to the condition of the historic environment, including heritage at risk and the reuse of vacant and underused historic buildings (NPPF, paragraph 185 and sub-paragraph a));</li> <li>• The means by which new development in and around designated heritage assets might enhance or better reveal their character and significance (NPPF, Paragraph 200);</li> <li>• How the archaeology of the plan area might be managed effectively (NPPF, footnote 93);</li> </ul>	<p>regards particular classes of non-designated heritage asset. Policy HA7 has been added to cover archaeological heritage assets.</p> <p>We believe that the plan taken as a whole (including, in addition to the heritage chapter, policies SD1, SD2, CD1, CD2, CD3, CD4(b), CD5, CD6, CD8, LC2, LC5, LC6, EC8, EC11, EC12, TC1, TC2, TC4, H2, H3, H3(a-g), GI4, ST4) incorporates 'a positive strategy for the conservation and enjoyment of the historic environment', including heritage assets at risk and vacant/ underused buildings. We do not currently have assets on the Heritage at Risk register, but are not unmindful of these issues. Further powers are available to the council in the form of Article 4 Directions, and the issue of notices in respect of particular properties. We believe the draft plan provides a sufficient policy basis to use these as appropriate.</p> <p>Para. 200 states that LPAs should 'look for opportunities' for such enhancements. Examples of this in the draft Local Plan are the 'Housing, Biodiversity and Heritage site' identified in policy H2, and the requirements regarding 'Valued Views' included in policy LC2. Policy HA7 also addresses this in a general sense regarding designated archaeological assets.</p>

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			<ul style="list-style-type: none"> <li>• What implementation programmes and partners need to be identified in order to deliver a positive strategy for the conservation and enhancement of the historic environment (NPPF, paragraphs 9 and 185);</li> <li>• What indicators should be used to monitor the plan's historic environment policies' effectiveness.</li> </ul>	<p>Presumably this refers to footnote 63, concerning archaeological assets demonstrably of equivalent significance to scheduled monuments? Archaeological assets are now addressed in policy HA7. Please also see the Local List of Planning Requirements in respect of Heritage Impact Assessments and Desk-based Archaeological Assessments.</p> <p>Relevant 'Plans, Policies and Programmes' in respect of this topic area are identified in the Sustainability Appraisal. Further information about CBC planning policy documents (e.g. Conservation Area Statements, Development Briefs) and their projected timescales are provided in the Local Development Scheme. Individual heritage improvement schemes are being progressed by the council. We believe the draft Local Plan policies provide a sufficient framework for these interventions and are compliant with NPPF paras. 9 and 185.</p> <p>Monitoring Indicators are identified in the Sustainability Appraisal. They are namely:</p> <ul style="list-style-type: none"> <li>- The Number of Listed Buildings on the Buildings at Risk Register</li> <li>- The percentage of Conservation Areas with up-to-date Appraisals (i.e. last 5 years).</li> </ul> <p>Representors may suggest additional or alternative indicators.</p>
REP152/475	Historic England		We are not clear that an up-to-date evidence base exists for the historic environment elements of the	The council is commissioning a Heritage Study to ensure that the evidence-base remains up-to-date.



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			<p>Crawley Local Plan that can inform the policy framework and would assist in achieving sound and robust decisions on development affecting heritage assets. A current evidence base can inform opportunities to conserve the historic environment, such as site allocations positively addressing heritage assets at risk, and can help to ensure that development proposals avoid harming the significance of heritage assets (including effects on their setting).</p> <p>A Heritage Strategy or similar assessment document prepared in advance of, or alongside (if not already undertaken), the local plan can be a useful tool to amplify and elaborate on the delivery of the positive heritage policies in the Local Plan. Some local planning authorities have chosen to support their conservation strategy within the Local Plan using a topic-specific SPD.</p>	<p>This tends to happen on a site or area specific basis – Development briefs, CA Statements, Urban Design SPD guidance on shop fronts, adverts, CA and ASLC.</p>
REP152/476	Historic England		<p>We welcome the statement within the Crawley 2035: A Vision section that ‘The rich heritage which has shaped what the town is today will be respected, protected and enhanced’. We would welcome in support of this the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the NPPF.</p> <p>However, you will note from the above comments that we do not consider the policies as currently drafted to be sufficient in this respect. There also appear to be some omissions or gaps in the draft Local Plan, noted above, that should be addressed so that the strategy to conserve the historic environment required by paragraph 185 of the NPPF can be attained. This will</p>	<p>Amendments have been made to the Heritage policies to address this concern.</p> <p>It is hoped that the amended draft of the plan put forward for the Regulation 19 consultation addresses these concerns.</p>

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			<p>be a key test of the soundness of the plan and the achievement of sustainable development as defined in the NPPF when it is subject to examination.</p> <p>If you would like further advice on the content of this letter or to discuss how the draft Local Plan could be revised to better reflect the intention of the NPPF, please contact me.</p>	
REP175/639	Savills on behalf of St. Catherine's Hospice		<p>Section 6: Heritage</p> <p>3.15. The Strategic Policies HA1 (Heritage Assets) and HA2 (Conservation Areas) are of relevance to the site at St Catherine's Hospice due to the adjacent Conservation Area.</p> <p>3.16. Paragraph 185c of the NPPF highlights that heritage strategies should take into account '<i>the desirability of new development making a positive contribution to local character and distinctiveness.</i>' This is developed in Planning Practice Guidance (ref: 18a-003-20190723), which states that:  <i>".. Plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area."</i></p> <p>3.17. To realise the full potential of Crawley's heritage assets, the Council should proactively identify</p>	

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			development opportunities which will enhance the setting of historical features in the Borough. The allocation of the St Catherine's Site will undoubtedly make a positive contribution to the setting of the neighbouring Conservation Area, whilst ensuring the provision of much-needed housing.	We agree that the need to enhance and make a positive contribution to the Conservation Area is acknowledged as a factor to be addressed in the redevelopment of the hospice site.
REP177/654	The Woodland Trust	Policy HA2	<b>Heritage</b> Policy HA2 – We welcome the requirement for conservation areas to maintain and enhance the area's landscape value with regards to mature trees, hedges and public green spaces such as grass verges, and to respect and enhance the character of lower density developments with spacious landscaped settings including mature trees.	Support noted.
REP177/655	The Woodland Trust	Policy HA3	Policy HA3 – We welcome the requirement for areas of special local character to protect features of the historic and natural landscape such as mature trees, hedges, green verges, and historic banks.	Support noted.
REP184717	Sussex Wildlife Trust	Policy HA6	Section 6 – Heritage Assets Strategic Policy: HA6 Historic Parks and Gardens Given the age of the parks and gardens referred to in this policy, SWT suggest that there should be an acknowledgement of their role as potentially important areas for biodiversity. Therefore we make the following recommendations for amendments to this policy: '...The council will support development, unless it will have a negative impact upon the historic setting <del>and</del> , character <b>or biodiversity</b> of the designated Historic Park or Garden.'	The policy text has been amended to cross-refer to the other policies including biodiversity relevant to these sites.

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REP105/293	The British Horse Society	Pages 78-82	<p>The British Horse Society (BHS) is the UK's largest equine charity and equestrian membership organisation and the governing body for recreational riding. Its charitable objects include the promotion of equestrian safety, particularly on roads, and equestrian access to bridleways and other off-road multi-use routes for the public benefit. On behalf of The Society I would like to make the following comments:</p> <p><b>Open Space, Sport and Recreation Chapter (page 78-82)</b> It has long been felt that for vulnerable road users the most important recreational facility for Crawley would be a linked network of off-road, or quiet road, multi-use routes/paths for all NMUs (walkers, cyclists, equestrians), on the urban fringe of the town, with connections both inward to the centre, and outward to the wider countryside.</p> <p>The wording 'quiet informal recreation' does not appear on these pages, but there are many studies that show this to be the most important ingredient to promote activity, and health and well-being in present and future residents.</p>	Introductory text to Policy OS3: Rights of Way and Access to the Countryside has been amended.
REP105/294	The British Horse Society	OS2	<p><b>Strategic Policy OS2: Provision of Open Space and Recreational Facilities (page 81)</b> New housing development, especially large strategic developments, provide the best opportunities for creating new links in the public rights of way (proW) network, and there are good examples in Crawley of where this has happened. However, proW are not mentioned in this Policy, and it is not felt the term 'signed routeways' is sufficiently clear. The wording 'public rights of way and other signed recreational routes' would be clearer.</p> <p>S106 agreements should also be sought to provide and improve the proW network both within the development and connecting to the surrounding countryside network.</p>	Policy OS2 has been amended.

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REP105/295	The British Horse Society	Paragrap hs 7.15- 7.17	<b>Rights of Way and Access to the Countryside (page 81-82)</b> It is excellent to see the commitment to protecting prows and quiet roads.	Support noted
REP105/296	The British Horse Society	OS3	<b>Strategic Policy OS3: Rights of Way and Access to the Countryside (page 82)</b> Whilst the overall aims of this Policy are good, the first paragraph is felt to start in a very negative way by raising the question of whether <i>“it can be clearly shown that a Public Right of Way is unnecessary or not needed”</i> . The Policy should start by clearly and positively stating the intention that public rights of way will be protected, by ensuring that development does not result in the loss of, or adversely affect a right of way or other recreational route, unless a new route is provided of equal or better value. The network of prows are the principal means for walkers, cyclists, and equestrians to access the countryside. Many minor roads are used as links in the prow network, and any increase resulting from development in the volume (and speed) of vehicles using these roads makes them unsafe for vulnerable users, and fragments the prow network even more. The Reasoned Justification while mentioning the ‘recreational role’ of prows, makes no mention of their important ‘safety role’. In Policy OS3, bullet point ii), a clearer explanation of the term ‘multi-functional route’ and ‘range of users’ to indicate all non-motorised (vulnerable) users, walkers, cyclists, equestrians, would be preferable. It should be noted that the West Sussex Rights of Way Improvement Plan has been the subject of a 10 year review, and a new Rights of Way Management Plan 2018-2028 was published in April 2018 which is not accompanied by a Project List (relevant projects have now been transferred and included in the Local Transport Improvement Plan).	Policy OS3 has been amended, and an explanation of range of users has been provided.

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REP146/431	Resident 4	Policy OS1	<p>I wish to make the following comments on the Crawley 2025 Local Plan Review:-</p> <p><b><u>Policy OS1 Sports and recreation</u></b> Land for sports and recreation has been consistently eroded as the population of Crawley has increased such that football teams such as Crawley Wasps have to play their home games in East Grinstead because of insufficient facilities within the town. With thousands of new homes being planned <b><u>all existing recreational land needs to be protected</u></b> such as the sports fields in Tinsley Lane.</p> <p><b><u>PROPOSAL</u></b> <b>In accordance with Policies OS1 and H2 the existing recreational land east of Tinsley Lane should be protected and designated for sport and recreation only with improvement of the existing facilities for use by local clubs.</b></p>	<p>The Open Space, Sport and Recreation Study as well as Indoor Sports Facility Strategy and Playing Pitch Strategy are currently being updated and the final result due Mid 2020. These studies will provide an up to date understanding of the open space, sports and recreational uses and needs within Crawley. However, Tinsley Lane is an allocated site through the adopted Local Plan. This was subject to various stages of public consultation and examination scrutiny. The constraints referred to in the representation are all ones which were considered in detail as part of this, and the policy has been worded to address these. A Development Brief has been prepared and adopted to support and guide the successful and appropriate development of this site. On this basis the principle has been accepted and it is not being revisited to de-designate for housing.</p>
REP150/456	Sport England		<p>Sport England is supportive of principles in the <i>Open Space, Sport and Recreation</i> section. This will be better underpinned when the new studies mentioned at the beginning are completed and adopted.</p>	<p>Support for policies OS1 – OS3 in relation to Open Space, Sport and Recreation noted. The study review is expected to be completed by mid-2020.</p>
REP150/457	Sport England	Policy OS1	<p><i>Strategic Policy OS1: Open Space, Sport and Recreation</i>, is basically from the NPPF paragraph 97, but I welcome the final paragraph of the policy: <i>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</i></p>	<p>Support Noted.</p>

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			<i>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. I would also suggest that the site should be tested in the market place to gauge interest from other sports and community groups to use the site, but the valuation should be for D2 use, not the hope value of the site.</i>	
REP150/458	Sport England	Policy OS2	Sport England <i>supports Strategic Policy OS2: Provision of Open Space and Recreational Facilities.</i>	Support noted
REP155/517	West Sussex County Council	Policy OS3	<p><b>WSCC Highways</b></p> <p><b>Policy OS3 – Rights of Way and Access to the Countryside:</b></p> <p>it is welcomed that PROWs will be protected and enhanced where appropriate; however, this is stated as only where PROWs are not considered unnecessary or not-needed within a development site. The policy should be extended to enhance PROWs whenever part of a development proposal – laying improved, year-round useable surfaces or extending rights to cyclists (and horse riders where appropriate) will be of great value to achieve the plans Vision.</p> <p>CBC may wish to consider improvements or aspirations for sustainable travel in the wider area, such as:</p> <ol style="list-style-type: none"> <li>i. establishing a ‘Green Circle’ for walking and cycling around the borough with routes linking the centre;</li> <li>ii. developing links to surrounding areas, e.g. Kilnwood Vale, Buchan Country Park, the new Pease Pottage strategic site, Copthorne, Charlwood, Ifieldwood;</li> <li>iii. requiring all future footways/ footpaths to be provided for use by walkers and cyclists as a minimum. Routes that can reasonably be used by horse riders too should be provided as new public bridleways;</li> </ol>	Policy OS2 encourages provision of new public rights of way, and OS3 seeks to protect and enhance routes, to multi-functional routes. The further suggestions will be beneficial for the emerging Crawley draft Transport Strategy.

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			iv. paths designed and delivered for use by all ages and abilities.	
REP155/521	West Sussex County Council	Policy OS3	<p><b>Countryside</b> WSCC own the Buchan Country Park which although in Horsham DC area is located in south east part of the CBC, bordering land to south of Broadfield in the High Weald AONB. Buchan Country Park is also referred to in the plan as the Country Park. Specific comments are as follows: <b>Policy OS3 Rights of Way and Access to the Countryside:</b> the policy is clear and justified and reflects the aims of the West Sussex Rights of Way Improvement Plan.</p>	Comments and Support for Policy OS3 noted.
REP177/656	The Woodland Trust	Policies OS1, OS2 and OS3	<p>Policy OS1, OS2 and OS3 – We note that these policies seek to secure provision of open space for recreation and to protect rights of way and access to the countryside. We would urge also adopting policy standards for residential developments that support access to the natural environment and woodland for informal recreation. Natural England’s Accessible Natural Green Space Standard recommends that all people should have accessible natural green space:</p> <ul style="list-style-type: none"> <li>– Of at least two hectares in size, no more than 300m (five minutes’ walk) from home.</li> <li>– At least one accessible 20-hectare site within 2km of home.</li> <li>– One accessible 100-hectare site within 5km of home.</li> <li>– One accessible 500-hectare site within 10km of home.</li> <li>– A minimum of one hectare of statutory local nature reserves per 1,000 people.</li> </ul> <p>The Trust has developed a Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that:</p> <ul style="list-style-type: none"> <li>– That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.</li> </ul>	<p>The Open Space Study Review will update the evidence base, including in relation to the open space typology site locations and updated existing quality surveys and review the quality, quantity and accessibility standards appropriate for Crawley. Reference is now included in the supporting text for Policy OS2 referring to the Natural England and Woodland Trust standards.</p>



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			– – That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.	
REP184/718	Sussex Wildlife Trust	Policy OS1	Strategic Policy OS1: Open space, sport and recreation. SWT notes this policy and welcomes its acknowledgement that opens space for sports and recreational value will have environmental, green infrastructure and climate mitigation value and that this should be considered in any future proposals or changes to these spaces.	Support and acknowledgment of the value of Open space and its ability to mitigate the effects on climate change welcomed.
REP184/719	Sussex Wildlife Trust	Policy OS2	Strategic Policy OS2: Provision of Open Space and Recreational Facilities We do not believe that this policy is compliant with chapter 15 of the NPPF and therefore suggest the following amendment to the final paragraph: '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 <b>acceptable avoided</b> .	Policy OS2 amended.
REP188/780	Turley on behalf of Rainier Developments	Policies OS1-OS3	<b>Policies OS1 – OS3</b> 2.26 Rainier support the intentions of policies OS1 – OS3 relating to Open Space, Sport and Recreation and consider that these policies will assist in the promotion of mental and physical health wellbeing through increased choice and access to such facilities. 2.27 Central to the proposed development is an ambition to create a new public destination through the provision of the pocket park and flexible employment / retail space, as well as incorporating the existing mature trees with the emerging public realm proposals. The public realm improvements will be developed in close collaboration with West Sussex County	Support noted. A pocket park is a welcome addition to the public realm around Crawley Station.

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			Council to ensure that the proposed design further enhances the emerging plans for the Station Gateway proposals. These facilities will provide a natural open space within an urban area which will provide a space for residents of the proposed development as well as members of the public to meet and interact with one another.	
REP198/834	The Ifield Society		<ul style="list-style-type: none"> <li>• <b>Which open spaces, sports or recreational facilities in Crawley are most important to you?</b> Ifield Brook Meadows (Local Green Space – LGS) within the ancient Parish of Ifield (see maps attached: <b>*Appendix 7 provided with original representation to support*</b>) – for walking and cycling. Crawley Greenway – especially to the west of Ifield running from Willoughby Fields (to the north) through to Ifield Brook Meadows, through to Ifield Mill and Millpond to the south)</li> <li>• <b>Are there any recreational facilities you would like to see provided in Crawley between 2020 and 2035?</b> Ifield Brook Meadows (Local Green Space LGS) upgraded to Local Nature Reserve (LNR) – linking Ifield Brook Meadows with Ifield Mill and Millpond (via a new pedestrian crossing) with an Education and Heritage Centre staffed with wardens (similar to Warnham Nature Reserve) (<b>*Appendix 1, 3 &amp; 4 provided with original representation to support*</b>)</li> </ul>	Comments noted

<b>WELLBEING &amp; COMMUNITIES: INFRASTRUCTURE PROVISION</b>				
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REP22/057	Thames Water	Policy IN1	<p><b>General wastewater [and water supply] infrastructure comments</b></p> <p>We support Policy IN1 in principle, but consider that it should be improved in relation to water supply and wastewater/sewerage infrastructure.</p> <p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure.</p> <p>Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), July 2018, states: <i>“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”</i></p> <p>Paragraph 28 relates to non-strategic policies and states: <i>“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”</i></p>	<p>'In Principle' Support Noted. See comments below.</p>

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			<p>Paragraph 26 of the revised NPPF goes on to state:  <i>“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”</i></p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that <i>“Adequate water and wastewater infrastructure is needed to support sustainable development”</i> (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment &amp; Water Treatment Works upgrades can take 3-5 years.</p> <p>The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and</p>	<p>The council has commissioned an updated Water Cycle Study in conjunction with neighbouring authorities to provide a clearer view of infrastructure requirements for water supply and sewage which are likely to arise over the Local Plan period, and of the deliverability of the growth strategy set out in the Local Plan.</p>

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			<p>from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.</p> <p>As from 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water's charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges. Information on how off site network reinforcement is funded can be found here <a href="https://developers.thameswater.co.uk/New-connection-charging">https://developers.thameswater.co.uk/New-connection-charging</a></p> <p>Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:</p> <ul style="list-style-type: none"> <li>• The developments demand for water supply and network infrastructure both on and off site;</li> <li>• The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and</li> <li>• The surface water drainage requirements and flood risk of the development both on and off site and can it be met.</li> </ul> <p>Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at: <a href="https://www.thameswater.co.uk/preplanning">https://www.thameswater.co.uk/preplanning</a></p>	


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			<p>In light of the above comments and Government guidance we consider that the New Local Plan should include a specific policy on the key issue of the provision of water and sewerage/wastewater infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Local Plan include the following policy/supporting text:</p> <p><b>PROPOSED NEW WATER SUPPLY/WASTEWATER INFRASTRUCTURE POLICY TEXT:</b>  <i>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</i></p> <p><i>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</i></p>	<p>Amendments have been made to Policies IN1 and H3g in respect of the phasing of infrastructure in relation to development. It is noted that concerns regarding the phasing of waste-water infrastructure, as set out in the table accompanying this representation, relate specifically to the new Forge Wood neighbourhood, which remains Crawley’s only strategic site. This site already has outline planning permission, with reserved matters approval also having been granted in respect of over two-thirds of the development, and with over one third having already been built. Allocation of residual land in Forge Wood is proposed for a further 150 dwellings, with any further significant development north of Forge Wood likely to depend upon the progress of the proposed Area Action Plan for North Crawley. The projected phasing of residential development in Forge Wood and elsewhere is set out in Policy H2 and in the Housing Trajectory accompanying the plan.</p> <p>It is anticipated that the updated Water Cycle Study will identify any further amendments required to the Infrastructure chapter of the Plan in respect of the phasing of development and waste water infrastructure upgrades.</p>

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REP22/08	Thames Water	IN2	<p>We support Policy IN2 in principle, but consider that it should be improved in relation to water supply and wastewater/sewerage infrastructure.</p> <p>Local Plans should consider the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in the AMP6 period which runs from 1st April 2015 to 31st March 2020 and does not therefore cover the whole Local Plan period. AMP7 will cover the period from 1st April 2020 to 31st March 2025. The Price Review, whereby the water companies' AMP7 Business Plan will be agreed with Ofwat during 2019.</p> <p>We therefore request that the new Local Plan include the following policy/supporting text:</p> <p><b><i>“The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”</i></b></p>	<p>Clause added to Policy IN2 relating to long/medium term resilience of infrastructure. Otherwise the wording included in the Regulation 19 draft seems at least as supportive as proposed here.</p>
REP85/201	National Grid		<p>National Grid has appointed Wood to review and respond to development plan consultations on its behalf.</p> <p>We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.</p>	Noted.

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			<p><b>Further Advice</b></p> <p>National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database.</p>	
REP97/255 (repeat)	West Sussex County Council Asset Management and Estates Team		<p><b>1. Regarding Items:</b></p> <p>(6) The Oaks Primary School (9) Holy Trinity CE School (11) Our Lady Queen of Heaven School (13) Milton Mount Primary School (14) Oriel High School and The Brook School</p> <p>These sites are operational school playing fields under the ownership of West Sussex County Council. The fields are an integral and functional part of the schools. The Council, as Education Authority, has a statutory obligation to ensure that every child living in West Sussex is able to access a mainstream school in the county. Should there be a future requirement to create additional spaces at any of the schools in the planning area this would be in accordance with statutory obligations and a 'Biodiversity Opportunity Area' or 'Structural Landscaping' designation would serve to compromise the Councils ability to meet this need.</p>	<p>These designations have been carried forward from the adopted Crawley Borough Local Plan. They are based on factual evidence and studies undertaken to identify the existing character and purpose of the land.</p> <p>The requirements associated with the designations are set out in the existing and draft Policies (existing Policy CH7: Structural Landscaping &amp; Policy ENV2: Biodiversity; draft Policy LC1: Structural Landscaping &amp; Policy GI3: Biodiversity Sites).</p> <p>The council does not agree that these designations should be removed, nor consider they compromise the county council's ability to meet the needs for securing additional spaces at any of the schools in the planning area, or</p>



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			<p><b>We therefore wish to object to proposals that the school playing are included as a ‘Biodiversity Opportunity Area’ or as ‘Structural Landscaping’, for the reasons set out above, namely that they are already protected due to their status, and that there may be a future requirement to increase the capacity of the schools to accommodate additional children.</b></p> <p>2. <b>Regarding Item (15)</b> Land to the south of Cheals Roundabout appears to be designated as a ‘Biodiversity Opportunity’ – please advise. This is held by West Sussex County Council on behalf of our highways department and therefore unavailable for an alternative allocation.” It is land that is required to ensure that the road remains safe and can be well maintained. Future highways requirements are as yet unknown. However, we would be concerned if the land became unavailable for any necessary future improvements to take place due to the current designations”</p> <p>(15)The land to the north of Cheals roundabout appears to be designated as ‘Structural Landscaping’. Again, please advise and clarify. This land is also owned by WSCC, and is <b>being held to fulfil future strategic requirements.</b>(?)</p> <p><b>To resolve our concerns, we request removal of the areas of WSCC owned land known to the north and south of Cheals Roundabout (item 15) in Crawley from the proposed list of designated areas of Structural Landscaping or Biodiversity Opportunities as identified in the Local Plan.</b></p>	<p>meet the needs of the Highways Authority. However, the policies are clear that development should not be at any cost and the existing character would need to be taken into account in the design and landscaping of proposals. In addition, the policies also support the government’s expectation for securing “biodiversity net gain”.</p>

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REP131/365	Southern Water	Policy IN1	<p>Southern Water supplies potable water to the majority of the urbanised area of Crawley Borough. In this regard, please find our responses to consultation questions in respect of specific policies set out below.</p> <p>Strategic Policy IN1 – Infrastructure Provision (p84)  → <i>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?</i></p> <p>This policy is both appropriate and justified, as it is important to ensure that there is adequate water supply infrastructure to serve new development in order to ensure the level of service to existing customers is not adversely impacted.</p> <p>→ <i>Are there ways in which the policy can/should provide further clarification regarding the relationship between different types of developer contributions?</i></p> <p>Network reinforcement, required as a result of new development, is funded through the new infrastructure charge, introduced in April 2018. There is currently a charge to developers of £200 per property, however this charge is</p>	Support noted.

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			waived for water efficient development. Details can be found on our website <a href="https://www.southernwater.co.uk/infrastructure-charges">https://www.southernwater.co.uk/infrastructure-charges</a> . NB charges are reviewed annually.	
REP131/366	Southern Water	Policy IN2	Policy IN2 – The Location and Provision of New Infrastructure (p85) → <i>Is this policy justified and necessary?</i> This policy is both appropriate and justified, as it is important to ensure that new or improved water supply infrastructure can be provided as required during the lifetime of the Local Plan. This will help to ensure timely provision of additional capacity to meet the demand arising from new and existing development.	Support noted.
REP147/438	Surrey County Council		<b>Early Years Education Provision</b> Our Early Years comments are based on the vast majority of new housing to be delivered through the new Forge Wood neighbourhood in the north east of the borough. There are 2 full day care nurseries within 1.1 miles of the West Sussex/Surrey border in the north eastern area of Crawley. There are 6 other settings in this area which are extended day care provisions that offer a combination of different sessions running between 8am – 3pm. Early Years census information indicates that our full day care settings (8am-6pm) in the north east of Crawley were running at an average of 50% full in January 2019. Therefore there is potential capacity to accommodate additional children within a full day care setting. Most of the extended day care settings (9am-3pm) in the same area are operating at near capacity. There is sufficient childcare for extended day care at this current time but the settings could not withstand any additional pressure from development close by. Therefore SCC would expect any	The Forge Wood neighbourhood already has planning permission and includes provision for Early Years Education as part of the Community Centre which will be delivered as part of the development.  More widely developer contributions can be sought towards Education facilities as part of a planning permission. This could be in the form of CIL or S106. The position set out in the Planning Obligations Annex for the draft Regulation 19 consultation Local Plan review document is to seek S106.

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			developer to contribute towards early years provision should any development within Crawley generate an additional need.	
REP155/502	West Sussex County Council	Policy IN1	<b>WSCC Highways</b> <b>IN1: Infrastructure Provision: First paragraph</b> This text should be strengthened by amending 'and if mitigation can be provided' to ' <b>and where mitigation is to be provided</b> '. This will require the applicant to commit to a deliverable and funded strategy to provide the mitigation, rather than merely to demonstrate that such mitigation would be possible.	This section of policy text has been reworked, and it is considered that the amended text incorporates the sense of this suggestion.
REP155/518	West Sussex County Council		<b>Education</b> The numbers of new developments proposed, in addition to the adopted Local Plan (approx. 420) will equate to about 15 additional places per year of age. While these might be provided in the existing schools, it will ultimately depend on the housing mix. It is likely that an additional ½ FE is required at all secondary and primary schools. WSCC will continue to work with CBC to ensure that the correct provision is identified to be provided to mitigate planned development as the Plan develops to be identified in policy and/or the Infrastructure Delivery Plan.	Noted. CBC will continue to liaise with WSCC.
REP155/523	West Sussex County Council	Policy IN3	<b>Digital Infrastructure</b> <b>Policy IN3 supporting high quality communications:</b> WSCC supports the NPPF section 10 paragraphs 112 – 116 which outline the approach to be taken through planning policy and decisions in planning in regard to supporting high quality communications and the siting of telecommunications infrastructure. This is also supported by the 'Code of best practice on mobile network development in England' published by DCLG.	Policy IN3 has been amended in accordance with WSCC advice.

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			<p>WSCC strongly support that planning authorities hold policies that prioritise how, in making planning deliberations, they ensure developers make provision for gigabit-capable full fibre network and welcomes Policy IN3 in ensuring new development is full-fibre ready.</p> <p>Policy IN3 refers to incorporating fibre optic cables directly into development, however it is requested that <b>reference is made to 'gigabit-capable full fibre infrastructure'</b> in order to provide future-proofed broadband services and to support the delivery of future technologies.</p>	
REP155/524	West Sussex County Council		<p><b>Fire and Rescue Services</b></p> <p>Any increase in population, particularly over 65, will increase pressure on the service, as will any increase in commercial floorspace. WSCC would like to work with CBC following the Reg. 18 consultation to identify mitigation requirements from planned development to be reflected in policy and/or the Infrastructure Delivery Plan.</p>	This seems to concern cumulative pressures rather than individual site-specific mitigations, so we would anticipate this to be via CIL. There remains scope to seek fire hydrants on site, including through S106.
REP157/534	Department for Education	Page 83	<p>18. With regard to the consultation questions on key infrastructure priorities and whether any community facilities are missing or need improvement (page 83), DfE recommends that the next version of the Local Plan make reference to the provision of new schools on suitable sites when required, with a key priority that the provision of infrastructure should be in step with housing development, making appropriate use of developer contributions.</p>	See comments below regarding proposed amendment to Policy IN1.
REP157/535	Department for Education	Policy IN1	<p>19. With regard to the consultation questions for draft Policy IN1 (Infrastructure Provision), asking whether the proposed approach is appropriate, justified and consistent with the Community Infrastructure Levy (CIL) Regulations, DfE advises that the approach is reviewed following the introduction of the revised CIL Regulations on 1<sup>st</sup> September 2019. The CIL Charging Schedule should be</p>	Policy IN1 has been amended to refer specifically to seeking planning obligations towards specific Education schemes related to development. The Planning Obligations Annex

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			<p>reviewed alongside the Local Plan review, giving consideration to new Planning Practice Guidance on viability, CIL and planning obligations as well as the new CIL Regulations which remove the pooling limitation on planning obligations and allow both CIL and Section 106 funding to be used for the same item of infrastructure. These considerations are fundamental to your assessment of the deliverability of the plan, including the size of any infrastructure funding gap and how developer contributions should be secured. All phases and types of education should be considered, including the need for special educational needs provision, with needs and plans for provision set out in the plan.</p> <p>20. We note the statement in the IDP that provision of schools will form part of the calculation of CIL and additional funding sources will need to be considered. In light of the removal of the Section 106 pooling restriction and increased flexibility in how CIL and Section 106 funds are used, we recommend that the Council revisit this matter and consider using Section 106 planning obligations for the provision of new schools and school expansions in all cases where the development will give rise to a need for new school places and there is insufficient capacity in applicable schools to meet that need. It is important to consider the size of any CIL funding gap and whether there will be sufficient CIL funds available to cover the cost of these school places. If CIL will be insufficient or unavailable at the point of need, it would be preferable to seek developer contributions through a planning obligation, to mitigate the direct impacts of development.</p> <p>21. As recommended above, construction costs and land requirements should be incorporated in the viability assessment to ensure that any barriers to delivery are</p>	sets out approaches for pursuing these contributions.

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			identified early, to inform the Council's planning and prioritisation of infrastructure delivery. Government 'basic need' grant for the creation of new school places does not include funding for land acquisition. Therefore, it is particularly important that education land required within large development sites is provided at no cost to the local authority wherever possible, and pooled developer contributions (Section 106 and/or CIL) are secured for the purchase of standalone sites for new schools. We request that you consider carefully the appropriate balance of CIL and Section 106 funding for education, to ensure that new schools and school expansions can be delivered when they are needed, in step with housing development. Our guidance on securing developer contributions for education provides further advice on the types of education need that should be considered, and how to calculate the costs of provision.	
REP157/536	Department for Education	Policy IN2	22. DfE supports the sustainability objectives of draft Policy IN2 (New Infrastructure Provision). As explained above, DfE recommends that sites for schools are allocated in the plan, but in the absence of specific allocations the plan should at least recognise that essential community infrastructure such as schools may be considered an acceptable alternative use to other allocated uses, provided the location is proven to be environmentally sustainable and suitable to meet the needs of the community served. This is important in view of the land availability constraints in the borough and the importance of providing infrastructure for existing and new communities. It would also align with the "great weight" placed on the provision of school places in the NPPF. Making this clear in the plan would simplify the decision-making process when planning applications are considered. DfE requests this clarification in answer to the consultation question on page	Site options for a new secondary school in Crawley have been exhaustively considered by CBC, WSCC, LocatED and the DfE over the past two years and no site has been found to be appropriate to all parties. The Local Plan does not, therefore, propose specific allocations for educational uses, but Policy IN2 has been amended to give effect to this suggestion: i.e. stating that schools may be an acceptable alternative use on sites allocated for uses including housing, subject to relevant requirements being met.

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			<p>85, asking whether the wording needs further clarification in the policy or elsewhere.</p> <p>23. While there appears to be an intention to roll forward existing allocations from the adopted Local Plan, the Council should consider afresh the need for education facilities and the mechanisms for delivery, taking account of the latest Planning Practice Guidance and DfE guidance on securing developer contributions for education. As noted above, the absence of detail on education provision in the current Local Plan has been an issue for school delivery in the Crawley area.</p>	
REP174/623	Gatwick Airport Limited	Policy IN1	<p><b>Policy IN1: Infrastructure Provision</b></p> <p><b>Consultation Question 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?</b></p> <p>The general policy approach is appropriate and justified, however GAL request that the policy text is amended to reflect that mitigation measures required be reasonable and proportionate to the magnitude of any impacts.</p> <p>GAL considers that the reference to "significant" cumulative effects should also be amended to remove any subjectivity (Policy Text, First sentence).</p> <p>It should be noted that Gatwick Airport, as a site of national and regional significance and the largest single employment site in the Borough, may deliver benefits outside the Council's boundary that would be considered of strategic and community value for Crawley. We would request that the policy wording be amended as follows:</p> <p>The text should be reworded including text to be deleted and new text to be inserted in <i>italics</i>.</p>	<p>Wording has been amended with 'Substantial' inserted instead.</p> <p>Noted. However, the council considers that the notion of 'cumulative' impact already makes sufficient allowance for positive impacts offsetting some negative impacts. It is also felt that the 'positive impacts' need to be of a type relevant to the negative 'effects' which they are offsetting. It is not considered that this issue of relevance is sufficiently clear in the text suggested here.</p>



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			<p><i>"...and if mitigation can be provided proportionate to the cumulative effects, including positive impacts, on the existing infrastructure services."</i></p> <p><b>Consultation Question - Should this policy make specific provision in relation to particular types of infrastructure which are not adequately covered in other policies?</b></p> <p>In addition, the policy makes no reference to safeguarding and only refers to "...existing infrastructure services.". In respect of current Government policy the safeguarding of land in respect of expansion at Gatwick should be acknowledged. GAL therefore suggest the insertion of the policy wording: The text below sets out new text to be inserted in <i>italics</i>. <i>"...existing and safeguarded infrastructure services."</i></p>	<p>Noted: however, the focus of this sentence of the policy on existing infrastructure is deliberate. Potential infrastructure which may come forward on sites currently subject to safeguarding, but which does not at present provide a service, is a different proposition. Also the requirement for equivalent/alternative provision to be provided elsewhere in the event of loss is not easily applied to such 'potential' infrastructure.</p>
REP174/624	Gatwick Airport Limited	Policy IN2	<p><b>Policy IN2: The Location and Provision of New Infrastructure</b></p> <p><b>Consultation Question - Does any of the wording in the policy or elsewhere require further clarification?</b></p> <p>Noting the relative availability of development land around neighbourhood centres it may be appropriate to accept a wider definition that allows for areas with good, sustainable transport links and access to neighbourhood centres, in order to allow greater flexibility in meeting the policy intention. Recommended wording would be: The text below sets out new text to be inserted in <i>italics</i>. "Local community facilities should be located close to neighbourhood centres <i>or in areas with good, sustainable transport links and access to neighbourhood centres.</i>"</p>	<p>Text has been amended to include the Town Centre and appropriate locations close to Three Bridges Station.</p>
REP175/640	Savills on behalf of St. Catherine's Hospice		<p><b>Section 8: Infrastructure Provision</b></p> <p>3.18. Strategic Policy IN1 stipulates that existing services and facilities will be protected unless a replacement is provided or there is sufficient alternate provision available. The changing</p>	<p>Noted.</p> <p>In this particular case, it doesn't seem to be a question of a 'changing need', so much as one</p>

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			<p>needs of the borough should be recognised within this policy to allow for additional flexibility.</p> <p>3.19. As previously mentioned, St Catherine's Hospice is currently undergoing the process of relocating to an enhanced facility in Pease Pottage. Whilst this will relocate the services to the neighbouring District of Mid-Sussex, the facility will be relocated within two miles of its present location, enabling the provision of improved palliative care services to Crawley residents. Therefore, there will be no net loss of care in this area.</p> <p>3.20. The redevelopment at St Catherine's Hospice is a prime example of a justified loss of Infrastructure where changing circumstances allow use change.</p>	of whether 'there is sufficient alternative provision in the area'. For hospice provision the Pease Pottage site would meet that test.
REP177/657	The Woodland Trust	Policy IN1	<p><b>Infrastructure Provision</b></p> <p>Policy IN1 – we recommend that the glossary (p219) should explicitly include green infrastructure as part of the definition of infrastructure (in addition to the separate definition of green infrastructure).</p>	Noted. However, the council considers, for clarity, it is better to keep these definitions separate so as to avoid potential conflict between the Infrastructure policies and the Green Infrastructure policies. Certain GI assets are included within the definition of Infrastructure where the capacity of the infrastructure asset to serve the population is relatively inelastic and sensitive to demand arising from additional development.
REP196/807	Environment Agency	Policies IN1 & IN2	<p><b>Infrastructure Provision - Section 8</b></p> <p>The demand for new housing in the Borough is likely to result in significant built development during the lifetime of this Plan. Flood risk from all sources should be fully assessed any successfully managed as part of any further and future development. This may require the construction of infrastructure to assist in successfully managing that risk, this should be taken into account as part of considerations on this</p>	Noted. IN1 includes reference to the provision of infrastructure which is outside of Crawley but serving Crawley.

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			<p>aspect for the Borough as part of the Local Plan process. This will require Crawley Borough Council to work alongside other Risk Management Authorities, as well as making provision to implement the construction and long term management of flood risk management infrastructure as necessary.</p> <p><b>Policies IN1 and IN2</b> - As stated within the draft Local Plan, due to restriction in available areas for future growth within the Borough, there is a need for Crawley to work with adjacent Councils in order to find areas for development. The risk to flooding from any new development must be successfully managed so any development is considered safe for its lifetime, taking into account climate change, and the risk to flooding is not increased elsewhere.</p> <p>Due to the nature of flooding, the provision of infrastructure to manage flood risk may not be located on, or directly adjacent to, any development site. Fully consideration should be given within the Local Plan Policy for how this can be designed, delivered and maintained for the long term as part of any development proposal, especially if development is located in adjacent Council areas. Working closely with others is an important aspect of bringing forward any projects to reduce flood risk.</p> <p>The Council should give full consideration to how CIL could be used to support the development of flood risk management infrastructure as part of the Local Plan policy. Ensuring that CIL could be made available as part of the Regulation 123 listing for flood risk management infrastructure would be an important step in this process.</p>	<p>The council has jointly commissioned a Water Cycle Study and Strategic Flood Risk Assessment with neighbouring authorities.</p> <p>Flood Risk Management is also addressed by proposed Policies EP1 and EP2.</p> <p>Noted. The council considers that the Local Plan provides a framework for approaching such issues as part of a strategic development. Policy H3g (urban extensions) (sub para. iii) identifies flooding and drainage as criteria which the council will use in engaging with adjacent authorities, developers and other stakeholders as part of the duty to cooperate. This is also identified as an issue in respect of safeguarding for a western link road (policy ST4). Flooding is also expected to be one of the strategic matters identified in the Statement of Common Ground being prepared through the Duty to Cooperate.</p> <p>The Reg. 123 List allows for expenditure of CIL on strategic flood risk management infrastructure. In addition, legal restrictions associated with the list are no longer applicable as of 1 September 2019 owing to deletion of Regulation 123 from the CIL Regulations.</p>

WELLBEING & COMMUNITIES: INFRASTRUCTURE PROVISION				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			The Infrastructure Plan contains a section related to flood defence. We recognise the information contained within this section is up to date and reflective of conversations between ourselves and Crawley Borough Council earlier this year.	Noted.
REP198/835	The Ifield Society		<ul style="list-style-type: none"> <li><b>Are there any transport, utility, or community facilities missing or needing improvement in your neighbourhood/in Crawley?</b> An Education &amp; Heritage Centre is missing at Ifield Brook Meadows Local Green Space (as a new Local Nature Reserve is proposed). Ifield Park Nature Reserve perhaps? (<b>*Appendix 3 &amp; 4 provided with original representation to support*</b>) – to add to Tilgate Park, Broadfield Park, Goffs Park et. al.</li> <li><b>What should be the key infrastructure priorities for supporting the growth which is planned in Crawley for the period 2020-2035?</b> See Infrastructure Plan 2020 – 2035, July 2019, especially ‘Green Infrastructure’ (page 29) and Transport, Walking and Cycling (e.g. Crawley Healthy Walks) (page 34) (e.g. “Circular freeway footpath (&amp; cycle path?) route around town and with links to neighbourhoods” (especially to the west of Ifield (Willoughby Fields through to Ifield Brook Meadows and Ifield Mill and Millpond).</li> </ul>	Comments noted.
REP107/845	Town Access Group		<ul style="list-style-type: none"> <li><b>Are there any transport, utility, or community facilities missing or needing improvement in in Crawley?</b> Consideration should be given to the provision of more benches/seating in the town centre and perhaps elsewhere.</li> </ul>	This is improving with the Queen’s Square/ Queensway improvements. The council will pursue and support public realm improvements as part of new development on major sites, and also as part of wider programmes such as the Crawley Growth Programme and the Manor Royal BID.

<b>WELLBEING &amp; COMMUNITIES: INFRASTRUCTURE PROVISION</b>				
<b>Representor/ Representation Reference</b>	<b>Name/ Organisation</b>	<b>Policy/ Para/ Page No.</b>	<b>Comments</b>	<b>CBC Response</b>
REP206/916	NHS Property Services	Policy IN1	<p>Thank you for the opportunity to comment on the above document. The following comments are submitted by NHS Property Services (NHSPS).</p> <p><b>Foreword</b> NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.</p> <p><b>Overview</b> In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.</p> <p>NHS Property Strategy teams support Clinical Commissioning Groups (CCGs) and Sustainability and Transformation Plan (STP) groups to consider ways the local health and public estate can be put to better use. This includes identifying opportunities to reconfigure the estate to meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites.</p> <p><b>Strategic Policy IN1 (Infrastructure Provision)</b> NHSPS notes that infrastructure includes 'health' in Paragraph 8.7 of Strategic Policy IN1 (Infrastructure</p>	

<b>WELLBEING &amp; COMMUNITIES: INFRASTRUCTURE PROVISION</b>				
<b>Representor/ Representation Reference</b>	<b>Name/ Organisation</b>	<b>Policy/ Para/ Page No.</b>	<b>Comments</b>	<b>CBC Response</b>
			<p>Provision), which seeks to protect existing infrastructure services and facilities '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.'</p> <p>The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be allowed to develop, modernise or be protected in line with the integrated approaches set out within NHS Health Estate Plans. Planning policies should support this and be prepared in consultation with the NHS to ensure they help deliver estate transformation.</p> <p>It is important to note that there are separate, rigorous testing and approval processes employed by NHS commissioners to identify unneeded and unsuitable healthcare facilities. These must be satisfied prior to any property being declared surplus and put up for disposal or development.</p> <p>Where it can be demonstrated that NHS facilities would have their use changed, having met NHS testing and approval processes before being declared surplus, it should be accepted that this provides sufficient evidence that a facility is neither needed nor viable for its current use or other community uses and that adequate facilities, which meet the needs of the local population, are or will be made available.</p> <p>Indeed, whilst an NHS facility may sometimes require a physical replacement, this is not always the case. In some circumstances it would be possible to meet the needs of the</p>	

WELLBEING & COMMUNITIES: INFRASTRUCTURE PROVISION				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>local population through existing facilities and IN1 gives provision for this.</p> <p>However, to ensure policy IN1 is sufficiently flexible and supportive of NHS estate management priorities, the following amendment has been suggested;</p> <p>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, <b>for that type of infrastructure, (for example health)</b>, in the area.</p> <p>IN1 also rightly identifies the importance of CIL and planning obligations in delivering infrastructure as part of development proposals. NHSPS would request that the Council and other partners work together to forecast the infrastructure and costs required to support the projected growth and development across the borough. A vital part of this is ensuring the NHS continues to receive a commensurate share of s106 and CIL contributions to mitigate the impacts of growth and help deliver transformation plans.</p>	<p>Policy IN1 has been amended to reflect this comment. However, examples are not listed within the policy text as the risk is that this would have to turn into a comprehensive list. The glossary identifies health facilities as coming under the definition of Infrastructure.</p> <p>Noted. Health facilities will be eligible for CIL contributions subject to the prioritisation of projects in accordance with the council's CIL governance process.</p>
REP206/917	NHS Property Services	Para. 8.9	<p>NHSPS supports Paragraph 8.9, which requires developer contributions to mitigate the impacts of planned growth on existing infrastructure in the area and the recognition of the cumulative impact development can have on infrastructure.</p> <p>The cumulative impacts of smaller residential developments should continue to be recognised, and health facilities should be put on a level footing with affordable housing and public transport improvements, given their strategic importance, when receiving funds.</p>	<p>Noted. The council has sought further clarification from the CCGs on the approach to health in terms of developer contributions, and no concerns were raised regarding the use of CIL for health provision.</p>

<b>WELLBEING &amp; COMMUNITIES: INFRASTRUCTURE PROVISION</b>				
<b>Representor/ Representation Reference</b>	<b>Name/ Organisation</b>	<b>Policy/ Para/ Page No.</b>	<b>Comments</b>	<b>CBC Response</b>
			NHSPS thanks the Council for the opportunity to comment on the Early Engagement Document and looks forward to working on future rounds of consultation.	
REP207/918	West Sussex County Council Digital Infrastructure Team	Policy IN3 and Paras. 8.15 – 8.22	<p>I can answer the consultation questions on behalf of WSCC's Digital Infrastructure Team:</p> <ol style="list-style-type: none"> <li>1) Yes, I agree that the policy is justified and necessary.</li> <li>2) I would suggest not including further detail regarding the specification and standards of cabling as the technology is moving at pace and there is a danger that detailing specifications now will inhibit developers incorporating the latest technology in the future.</li> <li>3) No further clarification needed as the policy details all residential, employment and commercial development.</li> <li>4) Yes, reference is made to gigabit-capable full fibre broadband.</li> <li>5) We mooted creating a best practice guidance document along the lines of the WSCC Environmental guidance. I'll ask Caroline West about the process for getting one drafted and how the Environment document was introduced and used with colleagues in planning authorities.</li> </ol> <p><b><i>*Attached Policy with suggested track changes*</i></b></p>	<p>Support noted.</p> <p>The suggested amendments have been incorporated into the draft Plan Policy.</p>



<b>ECONOMIC GROWTH &amp; SOCIAL MOBILITY: ECONOMIC GROWTH</b>				
<b>Representor/ Representation Reference</b>	<b>Name/ Organisation</b>	<b>Policy/ Para/ Page No.</b>	<b>Comments</b>	<b>CBC Response</b>
REP120/334	Mole Valley District Council		<p><b>Economic growth</b></p> <p>The constrained land supply position in Crawley means there is also an unmet need for employment land of between 44.6 and 57.6 hectares over the Plan period (it is noted that these figures still need to be refined). The unmet need for employment land is significantly affected by the uncertainty of a possible additional runway at Gatwick Airport and the need to safeguard land for this reason. It is understood that the unmet employment need could be accommodated within this area of safeguarded land in the event that the safeguarding is lifted. We support CBC in seeking to remove the current safeguarding.</p> <p>It is understood that some of the unmet business need could be met through a new business park at Horley within Reigate and Banstead, Given that the new business park would be unable to accommodate all of the unmet need, it would be helpful to receive clarification on what unmet employment land need that is likely to remain.</p> <p>There are significant physical and policy constraints on development in the south eastern part of Mole Valley, adjacent to Crawley, which limit the potential for growth in this area. Transport links between Mole Valley and Crawley are weak, mainly comprising rural lanes with limited capacity. The only A-road connections are the A217 and A264/A24. The A217 reduces to a single carriageway north of the CBC boundary and serves only one small settlement (Hookwood) in Mole Valley before continuing north to Reigate. The A264/24 is far from a direct route; the A264 lying to the south of Crawley and connecting to the A24 some 5km south of Mole Valley's boundary. Public transport connections are</p>	<p>Support for removing safeguarding noted. The council does not consider that the government's draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place.</p> <p>Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. The Regulation 19 Local Plan does not therefore retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough</p>

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			<p>also weak, with limited or no bus service in the rural areas of Mole Valley.</p> <p>Gatwick Airport is a major constraint, both in physical terms and in terms of the consequences of air traffic on the southern part of Mole Valley. The south eastern part of Mole Valley is also significantly impacted by flooding (Flood Zones 2 and 3).</p> <p>For the reasons outlined above, we consider that Mole Valley would be unable to accommodate CBC's unmet employment land needs owing to the identified physical and policy constraints, in conjunction with the limited available employment land within the south eastern part of the District.</p> <p>Based on current evidence, we do not believe there is any realistic prospect of Mole Valley contributing to the unmet housing or employment land needs of Crawley.</p>	<p>in a less constrained scenario. The most appropriate, sustainable locations for economic development within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.</p> <p>The EGA also provides a constrained, past trends scenario of 33ha need which is the level of growth the Local Plan plans for. There is an unmet need of 21ha, and ongoing liaison is taking place with RBBC to determine how much of this could be met by the Horley Business Park. The poor connections and transport links from Mole Valley into Crawley are recognised.</p>
REP143/424	Indigo Planning on behalf of McKay Securities Plc.	Policy EC1	<p><b>Strategic Policy EC1</b></p> <p>In order to maintain Manor Royal “as a strong and competitive business district”, it is essential that growth is allowed and facilitated within this area to keep sites viable, adaptable and attractive to the unpredictable business market. Amendment to this policy is also required to ensure that it is consistent with Policy EC6 (Manor Royal).</p> <p>Part iii) of emerging Policy EC1 should be amended as follows:</p> <p>“iv) Support minor extensions <b>and intensification</b> to Manor Royal, where this would delivery additional B-class business land, and can be achieved in a manner that is consistent with other Local Plan policies.”</p>	<p>Noted and support welcomed. This is a sensible approach that improves the consistency between Policies EC1 and EC3 (Manor Royal), and text has been amended accordingly.</p> <p>Additional text has been added in the form of amended text for Policy EC1 and a new Paragraph 9.13 to make clear that the reuse and intensification of existing Manor Royal sites will be encouraged.</p> <p>Manor Royal is a designated Main Employment Area, and as such is one of a number of sites within Crawley in which</p>

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>Paragraph 9.14 of the supporting text for this policy also refers to Manor Royal as the focus of growth for business-led development. As presently drafted, Policy EC1 does reflect this and does not encourage growth. This is a significant downfall of the policy as supporting paragraph 9.17 makes it clear that Crawley will fall short of its employment land needs with an outstanding need for 32.8ha of land. Allowing intensification of existing sites within Manor Royal will ensure it remains a competitive business district and will help meet an objectively assessed need for additional employment floorspace.</p> <p>Manor Royal should also be added to the hierarchy for delivering new strategic employment land within Policy EC1.</p>	<p>economic growth is supported. The limited supply of sites at Manor Royal, and Crawley's other Main Employment Areas, however, means that there will be unmet employment needs. Should the Area Action Plan determine that employment development can be located in within the AAP area, this would be the preferred approach to accommodating Crawley's unmet business land requirements, anticipated to be in the form a Strategic Employment Location(s) but if not, the council will continue working with neighbouring authorities.</p>
REP143/425	Indigo Planning on behalf of McKay Securities Plc.	Policy EC9	<p><b>Strategic Policy EC9</b></p> <p>We support this policy in principle, it encourages the reuse and intensification of land or buildings to support the established role and function of Manor Royal.</p> <p>However, we are concerned with the proposal to seek a financial contribution towards public realm improvements where developments involve a net increase in gross internal area of just 50sqm and above. This is an extremely low threshold and below the general CIL regulation threshold of 100sqm. Seeking financial contribution for such little development will discourage potential applicants from making improvements and enhancements to their sites which could undermine policy aims to maintain and enhance the business function of Manor Royal. Seeking such a contribution is not seem informed by proportionate evidence and may undermine the deliverability of the Plan. Therefore, this policy requirement is not consistent with national policy or PPG Paragraph 48 (Plan-making) and should be deleted.</p>	<p>Noted and support for general policy approach is welcomed.</p> <p>The Manor Royal contribution is not new and forms part of the existing Development Plan through the Manor Royal Design Guide SPD and Regulation 123 list. The contribution itself is based on a figure of £2 per square metre, and will be subject to viability testing as part of a whole Plan viability assessment to ensure that Plan deliverability is not undermined. It is accepted that for consistency with the CIL regulation threshold, a figure of 100 square metres is appropriate, and corresponding amendments have been made to Policy EC3 (as amended) and supporting text.</p>

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REP143/426	Indigo Planning on behalf of McKay Securities Plc.	Policy EC10	<p><b>Strategic Policy EC10</b> Policy EC10 should be amended to make it clear that new residential development adjacent to the Manor Royal Buffer will also be required to ensure that the economic function of the buffer zone is not constrained.</p> <p>The buffer zone should also be considered for higher density, mixed use development which delivers both additional employment floorspace and new residential development in a way which will allow all uses to thrive alongside one another. This would also help deliver and be consistent with Strategic policy H1: Housing Provision.</p>	The Manor Royal Buffer Zones are in place recognising that these parts of Manor Royal are situated close to adjoining residential developments. Manor Royal is a designated Main Employment Area, and given the pressing need for business land, the Local Plan seeks to protect Manor Royal for business uses. This applies within the Buffer Zones also, recognising that business uses in these locations will be supported, but will be required to demonstrate that the proposed use would not adversely impact upon the amenity, function and setting of nearby residential uses. Were residential uses to be allowed within the Buffer Zones, this would have the effect of enabling amenity sensitive residential uses to encroach further into Manor Royal, potentially undermining its business function. In this regard, a more flexible approach within the Buffer Zone to allow residential would not be consistent with the policy objective to promote economic growth, and is not supported.
REP150/459	Sport England		<p>Sport England supports Crawley's <i>Economic Growth &amp; Social Mobility</i> vision as set out on page 88. I would like CBC to consider the following when assessing uses within employment land:</p> <p>Sport makes a huge contribution to the lives of individuals, to the economy and to society. Sport England has undertaken research to examine the economic value of sport in England. The main conclusions are:</p>	Noted. The Local Plan recognises that the sport and recreation industry makes an important contribution to the Crawley economy. This is reflected in the Economy Chapter of the plan which specifically designates Broadfield Stadium and K2 Crawley as a Main Employment Area.

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			<p>In 2010, sport and sport-related activity generated Gross Value Added (GVA) of £20.3 billion – 1.9% of the England total. This placed sport within the top 15 industry sectors in England and larger than sale and repair of motor vehicles, insurance, telecoms services, legal services and accounting</p> <p>Sport and sport-related activity is estimated to support over 400,000 full-time equivalent jobs – 2.3% of all jobs in England. Sport also generates a range of wider benefits, both for individuals and society.</p> <p>The benefits of playing sport include the well-being/happiness of individuals taking part, improved health and education, a reduction in youth crime, environmental benefits, stimulating regeneration and community development, and benefits to the individual and wider society through volunteering</p> <p>Consumption of sport benefits include the well-being/happiness of spectators, and the national pride/feel good factor through sporting success/achievement.</p> <p><b>Sport England's Economic Value of Sport – Local Model (updated Nov 2015)</b></p> <p>All local authorities in England can demonstrate how sport benefits their economy using our new Economic Value of Sport – Local Model.</p> <p>The model produces area based (local authority, county sport partnership and local enterprise partnership) estimates on sports' contribution to the local economy in the form of business output (GVA) and jobs plus wider benefits like health. I am attaching a copy of the model for Crawley Borough Council which can be found at</p>	<p>Within the Main Employment Areas, the Local Plan applies a flexible approach that supports a range of economic growth, including through commercial sport and leisure. The Plan also recognises that Crawley Town Centre itself provides an important commercial recreational and leisure offer, and also provides flexibility for commercial sport/recreational uses at Manor Royal Business District where these are of a scale and function that supports, and does not undermine, its established business role and function.</p>

ECONOMIC GROWTH & SOCIAL MOBILITY: ECONOMIC GROWTH				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p><a href="https://www.sportengland.org/research/benefits-of-sport/economic-value-of-sport/">https://www.sportengland.org/research/benefits-of-sport/economic-value-of-sport/</a></p> <p>Some of the key headlines for the Crawley are:</p> <p>It is estimated that there are 852 jobs created as a result of participation in sport in the District at GVA of £31.1m</p> <p><a href="https://www.sportengland.org/our-work/partnering-local-government/tools-directory/economic-value-of-sport-local-model/">https://www.sportengland.org/our-work/partnering-local-government/tools-directory/economic-value-of-sport-local-model/</a></p> <p>The total direct economic value of sport to the District as whole is £50.3m with a total employment of 1289 people. This is interesting because referring to nomis <a href="http://www.nomisweb.co.uk/reports/lmp/la/1946157342/report.aspx">http://www.nomisweb.co.uk/reports/lmp/la/1946157342/report.aspx</a>, they suggest that the latest figures indicate that 1,250 people were employed in the Arts, Entertainment and Recreation Industry (section) in 2017. This equates to 1.3% of the working population, which is the same number as people employed in the Electricity, Gas Steam and Air Condition Supply and more than employed within Water Supply, Sewage Waste Management and remediation Activates, Real Estate and Other Service Activities.</p> <p>Non-participation GVA of sport (spectating, gambling etc.) is estimated to be £18.2m, creating 437 jobs. Another benefit of sport is the £49.4m in health savings, £11.9 in volunteering and a further £5.9m in wider spending.</p> <p>Another impact which should be considered is sport's education and mentoring programs for young people which are continually highlighted for their success in engaging with low achievers at school and equipping them with jobs and qualifications, which other employment sectors have not been able to achieve:</p>	

<b>ECONOMIC GROWTH &amp; SOCIAL MOBILITY: ECONOMIC GROWTH</b>				
<b>Representor/ Representation Reference</b>	<b>Name/ Organisation</b>	<b>Policy/ Para/ Page No.</b>	<b>Comments</b>	<b>CBC Response</b>
			<p><a href="https://www.sportengland.org/research/benefits-of-sport/social-value-of-sport/">https://www.sportengland.org/research/benefits-of-sport/social-value-of-sport/</a></p> <p>It is Sport England's contention that the Crawley Borough Plan should consider D2 sports uses, e.g. fitness clubs, gyms, climbing centres and five aside centres, to be acceptable on employment sites, as they do create sustainable employment opportunities and provide work experience and qualifications in cases for the less academically inclined.</p> <p>When sports facilities are designed in as part of an employment park e.g. Wolverhampton Business Park or Harwell Science Park, it creates a better and more sustainable working environment and therefore an attractive area for business to locate in or relocate to.</p> <p>It should also not be overlooked that there are usually more employment opportunities generated through a commercial gym, e.g. David Lloyd Gyms or commercial football like Football First, or a gymnastics club D2 use, than a 500,000m2 B8 use.</p> <p>In conclusion, Sport England wishes the Crawley Borough Plan to acknowledge that commercial sports (not retail) are a Bona Fide use on Industrial and Business parks creating employment as well as inputting into the local economy. Therefore, they should be treated like any other business when applying for planning permission for change of use or new development on sites covered in this Plan.</p> <p>I trust that my suggestions and comments will be given due consideration. However, if you require any clarification on any of the issues raised, please do not hesitate to contact me.</p>	

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REP154/488	Manor Royal BID		<p><b>Economic Growth and Social Mobility</b></p> <p>The policies and approach to promoting Manor Royal Business District are largely in line with previous policies and are designed to protect the prime function of Manor Royal, which the Manor Royal BID is supportive of. However, other than stating the Council intends to protect Manor Royal for B Use Class development (Offices, Industrial units and warehouses), it shows little regard for how the Local Plan will support the improvement of the Business District or respond to strategic needs of businesses as outlined by recent studies and work of the Manor Royal BID.</p> <p>In light of Manor Royal's strategic importance to the town and the intention to support development outside of the town (e.g. Horley Business Park), it is important that the Local Plan reflects the need to upgrade the offer, improve public realm and facilities available onsite, address transport issues and encourage supporting and complementary uses to help create a quality of place that encourages investment and helps retain businesses.</p> <p>The Local Plan should be more positive about its support and encouragement of these improvements in order to attract and retain businesses and members of staff, as opposed to merely stating what it won't allow or will resist.</p> <p>It will be important to manage this carefully to deter development "creep" so the overall scale of any alternative uses permitted genuinely enhance Manor Royal's primary function.</p> <p>Reference to the Manor Royal Masterplan (2010) and Manor Royal Design Guide SPD (2013) is helpful but the Local Plan could have and should have responded more positively to much more recent studies carried out by the Manor Royal</p>	<p>Noted and broad support is welcomed. Policy EC3 has been revisited to make clearer how the Local Plan will support the improvement of the business district, to enable it to build upon its strengths as the leading business district in the Gatwick Diamond, whilst helping Manor Royal to respond to challenges to its growth.</p> <p>In doing so, the revised policy has regard to those objectives identified in the Manor Royal Economic Impact Study (2017) which can be delivered through the planning system.</p> <p>The revised policy maintains the existing approach of supporting B-class business development within the Main Employment Area, and non B-class development where this would enhance, and not undermine, its core business function.</p> <p>However, the policy and supporting text is now more explicit in referring to the recognised lack of supporting business facilities and staff amenities, and identifies the key development types that will, subject to scale and function, be supported. In this regard, the policy is now clear that a dedicate business hub will be supported where this provides genuine step change to ensure that Manor Royal is well placed to respond to the challenge of its competitors.</p> <p>The policy refers specifically to the need to support improvements to the physical and aesthetic environment at Manor Royal. This</p>



ECONOMIC GROWTH & SOCIAL MOBILITY: ECONOMIC GROWTH				
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			<p>BID, some undertaken in partnership with the Borough Council itself. There is no mention whatever of these more contemporary studies and the current lack of detail supporting the development and promotion of Manor Royal reflects that.</p> <p>Earlier engagement with the Manor Royal BID prior to the publication of this document would have helped.</p> <p><b>*Appendices Attached to Representation*</b></p>	<p>includes reference to the Manor Royal Design Guide as previously, but now also refers to the role of the Manor Royal contribution that has previously been sought towards public realm, and also to joint working between the council and Manor Royal BID in identifying specific projects.</p> <p>It is noted that Manor Royal BID would have appreciated earlier engagement on the draft plan. However, the council must be even handed in its engagement, and the published Regulation 18 Local Plan represented the first stage of public consultation for stakeholders.</p>
REP154/489	Manor Royal BID	Policy EC1	<p><b>Support for a Strategic Employment Location / Horley Business Park</b></p> <p>The Local Plan recognises the need for the demand for future commercial floorspace to be accommodated outside of the Borough boundary and in so doing is supportive of Horley Business Park. While the Manor Royal BID acknowledges this it makes the following points.</p> <p>Horley Business Park, or any other such development, will benefit from being planned in such a way to provide the most attractive environment possible for business and people in terms of accommodation, public realm, environment and facilities. If Manor Royal Business District is to remain competitive the Council must be prepared to work with the Manor Royal BID to ensure its offer is upgraded and the Local Plan needs to offer more positive support for how that will be promoted and achieved beyond straight-forward protection.</p>	<p>Noted. The updated Local Plan evidence base identifies Crawley as having a total need of 33 hectares new business land, 21 hectares of which cannot be accommodated until assessed through the Area Action Plan. Given the challenges faced by Crawley in meeting its business land requirement, we are required to work with neighbouring authorities to help accommodate some of this need.</p> <p>Manor Royal is the principal business location in the Gatwick Diamond, and is vital to Crawley's economy. It is right that the Local Plan does all it can to support economic growth in Crawley, and specifically, supports Manor Royal is accommodating business growth and responding to the challenges posed by existing and emerging business locations.</p>

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			<p>Improved facilities, further investment in public realm, investment in transport infrastructure, supporting the improvement in broadband, environmental performance, general maintenance and upkeep, better promotion (in policy and other terms), and consideration of easier planning for minor amendments are all areas identified by the various studies not referenced by the Local Plan and as such are under-played.</p> <p>The Manor Royal BID recognises the point made by the Local Plan that Manor Royal has experienced significant change over the previous plan period. Almost all previously available sites are now at various stages of development. Consideration of including the land currently safeguarded to the north of Manor Royal to accommodate strategic development has some merit. This is discussed further in the Gatwick section of this response, however, the transport and infrastructure requirements of any new strategic development have to be carefully considered with significant investment required to accommodate any such development as the current infrastructure is already at capacity in many areas, particularly at peaks times.</p> <p>The Local Plan is currently unclear as to whether there is sufficient demand to accommodate <i>both</i> the Horley Business Park <i>and</i> the development of another strategic employment location, possibly to the north of Manor Royal. If not, the Council should consider which of these sites it prefers and be clear on its position to avoid simultaneously promoting both sites and undermining existing locations, including Manor Royal. Therefore, the Local Plan should be clear whether its support of Horley Business Park or other sites is contingent on development to the north of Manor Royal.</p>	<p>As discussed above, Policy EC3 and its supporting text has been amended to respond more explicitly to planning-related objectives identified in the Manor Royal Economic Impact Study (2017). Through Policy IN3 (Supporting High Quality Communications) and its Sustainable Design &amp; Construction and Sustainable Transport chapters, the Local Plan provides a framework to support wider improvements.</p> <p>The Economic Growth Assessment (2020) is assembling the evidence to advise if there will be Crawley's business land requirement is such that a strategic employment location is required in addition to the business park allocated by RBBC at Horley. Initial findings indicate that based on Crawley's uncapped housing need figure, such provision is likely to be needed. For clarity, CBC is not promoting the HOR9 allocation, nor is it promoting a specific strategic employment site at this time. The scope to accommodate a strategic employment location within Crawley will be explored through the North Crawley Area Action Plan.</p>

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			<p>If the Local Plan is to promote a new strategic employment location at or near Crawley the Council needs to demonstrate how such a development can be accommodated so that it is not to the detriment of existing employment locations and the town in general. The Local Plan will also need to demonstrate how such development will be “complementary” and how the Council will help to ensure Manor Royal remains competitive should a new strategic employment location be proposed or else risk the erosion of the Business District by inadvertently encouraging displacement or the transition towards lower value uses.</p> <p><b>*Appendices Attached to Representation*</b></p>	
REP154/490	Manor Royal BID	Policy EC3	<p><b>Promotion of office provision over other uses</b> Manor Royal Business District is one of the South East’s leading mixed use business locations transitioning as it has from a traditional manufacturing base, where manufacturing still accounts for a significant proportion of jobs.</p> <p>There is strong demand for industrial and warehouse facilities although the longer term trend (since 2010) shows an overall increase in office floorspace being delivered.</p> <p>The Local Plan evidence base suggests there is demand for 5,595 new jobs to be accommodated over the plan period to 2035 with 2,800 (roughly 50%) being office based. In floorspace terms there is a projected demand for 57.6 hectares of employment space of which 25 hectares (43%) is required for office development.</p> <p>On this basis it is unclear why the Local Plan should preferentially promote office over other kinds of development, although in terms of setting and function there may be benefits in encouraging complementary uses to come forward in similar locations, an approach that has been</p>	<p>Noted. Policy EC5 (Office Provision) is not seeking to promote office uses over other uses. The EGA identifies need for a minimum 27,200sqm office floorspace, and 103,700sqm industrial floorspace over the Plan period, and the Local Plan sets in place a framework that supports the delivery of both. The EGA also identifies specific qualitative issues relating to Crawley’s office floorspace, with much of the stock not of the quality/type that is sought by the market. This is to an extent reflected in the high vacancy rates for offices at Manor Royal. The overall qualitative supply issue is serving to repress the office market in Crawley’s, and there is an opportunity for economic growth if offices of the right quality and type can be delivered.</p>

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			<p>strongly resisted by the market when it has been proposed in past iterations of the Local Plan.</p> <p>Of the developments proposed in Manor Royal in the recent past, offices have been the most difficult to deliver. It is also the case that the highest levels of stubborn vacancy in Manor Royal is in the office sector. The Local Plan suggests that this tends to be because the available stock is of lower quality and might be unattractive to current occupiers, although newer office space is available with more benefitting from having received recent planning consent e.g. Gatwick Park.</p> <p>Based on the current evidence it is difficult to understand the justification for the Local Plan to prioritise office development in such a seemingly unsophisticated way based on a gross assumption of projected floorspace undersupply, especially when “other” floorspace is equally in demand, if not more. A better understanding of “place” is required in the application of any such policy that takes account of the changing needs of the office occupier to reflect a greater emphasis of staff well-being, more agile working practices creating demand for less space (a trend likely to continue), a requirement for different and smaller floorplates, gaps in the size of offices currently available (office availability in Manor Royal and Crawley tends to be accounted for by a small number of larger office buildings) and the growing popularity of business centres and co-working facilities.</p> <p>Given the land supply issues the Local Plan should also be more specific on how it will encourage office developments to be built at higher densities to ensure the most efficient use of land. Efforts could be expended on how the current infrastructure could accommodate building at higher densities</p>	<p>The policy is therefore seeking to support the delivery of Grade A offices within the Main Employment Areas. To help achieve this, the policy removes the NPPF requirement that planning applications for office development outside the Town Centre satisfy the sequential test. By removing this requirement for office uses, the Local Plan recognises that the Main Employment Areas are appropriate locations for office uses. In being positive to support high quality office uses, the policy is not seeking to preferentially support office uses at the expense of other business uses. Rather, it is seeking to address an identified qualitative provision issue and provide a supporting framework through which to help achieve this.</p> <p>With regard to the issue of land supply and density, it is recognised that office uses will typically make for a more efficient use of land than industrial uses, both in terms of floorspace provided and employee density, and so delivery of office uses may help to support making the most efficient use of the available land supply pipeline. However, there is also evidenced need for industrial land, and the policy is not therefore seeking to promote office uses at the expense of industrial uses. Rather, it is seeking to address the qualitative gap in Crawley’s office provision. Through Policy CL4, development will be required to make for an effective use of land, but it would</p>

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			<p>instead of providing somewhat general encouragement of it while offering little practical assistance.</p> <p>It is also the case that, should the Council wish to adopt more positive planning and provide more of a steer to the market upon which it depends, more work could be done to identify and address accommodation gaps in terms of the size. This extends to all building types, including industrial and warehousing. For example, there is a lack of supply for smaller industrial units (sub-10,000 square feet) and much larger warehouse units (over 20,000 square feet). So called “grow-on” space is also in short supply forcing businesses to move out of Crawley in search of midsized type properties, whether industrial, warehouse or office.</p> <p>Further, in support of all occupiers and perhaps most especially office occupiers, the overall offer, appearance, public realm, supporting facilities, look and feel has to be excellent. It is not enough to encourage good design in buildings of any size if the context or “place” in which they are situated are not inviting and attractive. The Local Plan could do more to recognise and support the upgrade and improvement of Manor Royal.</p> <p>By this response the Council is reminded of the availability of “positive planning tools” it could introduce to facilitate area specific improvements, to make planning easier and serve as promotional tools in the form of Local Development Orders (LDOs), Simplified Planning Zones (SPZs) and similar as have been used in other locations and referred to in the Manor Royal Economic Impact Study.</p> <p>As it stands the proposal to promote office development over any other kind, and vice-versa, based on gross assumptions about overall future floorspace demands appear (a) not to be</p>	<p>not be appropriate for the Local Plan to provide policy that is overly prescriptive as to how this should be achieved. Where development is seeking to make for a more intensive use of sites, it will be for the applicant to demonstrate how this can appropriately be achieved through the planning application process.</p> <p>Through its other policies, particularly EC3 (Manor Royal) and also the Manor Royal Design Guide SPD, the Local Plan sets out how the planning system is able to contribute to the look and feel of Manor Royal as a place. The council notes the availability of planning tools such as LDOs and SPZs, but is of the view that the use of such tools in Manor Royal would undermine much of the positive work that has already been undertaken to promote the aesthetic environment at Manor Royal. Measures that would take certain development types out of planning control could mean that the design requirements of Policy EC3 and the Manor Royal Design Guide SPD cannot be implemented, risking a decline in the overall environment at Manor Royal.</p>

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			<p>justifiable based on the numbers alone and (b) are too blunt an instrument to properly consider qualitative aspects of place shaping required in Manor Royal.</p> <p><b>*Appendices Attached to Representation*</b></p>	
REP154/491	Manor Royal BID	Policies EC4 & EC5	<p><b>Visitor accommodation and night time economy</b></p> <p>The Local Plan recognises the recent developer interest for hotel development, including for Manor Royal. The Manor Royal BID supports the proposed approach of protecting Manor Royal's primary function to prevent it from losing significant volumes of floorspace for facilities related to holiday makers and overnight stays related to Gatwick Airport, a possible increased risk given plans for the Airport to expand.</p> <p>There is however an opportunity to encourage development that is complementary to Manor Royal's primary function as a business destination. This could both be in providing accommodation for business visitors to Manor Royal and in bringing forward development that could help to meet the demand for improved facilities in Manor Royal. The right kind of hotel development could improve the availability of leisure, food, meeting space and other services not currently available as described by previous studies and articulated in the Manor Royal BID "Hub paper". We would be delighted to have those conversations with the Council and to re-state the position and importance of this.</p> <p>The Manor Royal BID encourages the Council to continue to protect Manor Royal but to be more innovative in working with the market to explore how developer interest in this area might be used to help improve the provision of on-site facilities and, possibly, to deliver "the hub". More positive and specific statements in this regard would be helpful.</p>	<p>Noted and support welcomed. The policy has been strengthened to make clear that any hotel development in Manor Royal will be required to demonstrate how business supporting facilities and staff amenities will be incorporated into the development, and the scope for this to form a dedicated business hub.</p> <p>Support for night time economy policy is noted and welcomed.</p>

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			<p>Policies set out in respect of night time economy are related and are similar in terms of creating a better sense of place for Manor Royal provided they are complementary to the primary function of Manor Royal and go some way to addressing the gap in on-site facilities.</p> <p>Generally the Local Plan should be more positive in its support of encouraging development that addresses the facilities gap in Manor Royal and should re-visit studies that refer to this alongside the “hub” paper.</p> <p><b>*Appendices Attached to Representation*</b></p>	
REP154/492	Manor Royal BID	Policy EC6	<p><b>Employment and Skills Development</b></p> <p>Given the volume of space dedicated to this in the draft Local Plan it is clear the Council regards this as a priority. It is right that the Council uses whatever reasonable leverage it can to encourage developers to use “best endeavours” to address social challenges in the town. It should be careful however not to do so in a way that might be burdensome. Improving opportunities for local people to benefit from development in the town and help to tackle concerns related to social mobility are commendable.</p> <p>The Council should not lose sight of the fact that the town benefits from almost full employment that can, in itself, make recruitment difficult and that the town depends on its ability to attract people from outside of the town to work here as it already provides more jobs than there are people of working age to fill. There are examples of local employers who have found it difficult to fill available positions, including apprentices and other roles. The representation of Crawley residents in upper tiers of employment locally is a complex one, in which housing provision plays a part. From an employer’s perspective this problem is not simplistically about</p>	<p>Noted. Policy EC4 (formerly EC6) represents an important opportunity to ensure that major development contributes, on a proportionate basis, to addressing the existing social mobility and skills gap in Crawley. This is consistent with priorities identified in the Crawley Employment and Skills Programme.</p> <p>The objectives of the policy are twofold. First, the policy requires that an Employment and Skills Plan will be agreed between the developer and council to help support the use of local apprenticeships and labour during the construction phase of development.</p> <p>Secondly, a financial contribution will be sought towards providing training and support through Employ Crawley, for those individuals that require support in accessing sustainable employment. The level of contribution sought will be proportionate to the type and amount</p>

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			<p>the availability of skills locally but about the supply of skilled and other labour more generally, whether from within the Borough or the wider travel to work area.</p> <p>The Manor Royal BID encourages close working to help broaden the understanding of this issue in support of a growing economy and not confine it to simplistic local labour and skills supply issues and to be careful not to place undue burden on development or the planning system with the cost of funding a solution. The Manor Royal BID looks forward to working with the Council to ensure the needs of Manor Royal businesses are properly understood and addressed and that Manor Royal employers properly benefit from any funds generated by the Council in this area.</p> <p><b>*Appendices Attached to Representation*</b></p>	<p>of development proposed. It will also be subject to viability testing to ensure that it is not overly burdensome and that Local Plan viability is sound.</p>
REP154/493	Manor Royal BID	Policy EC8	<p><b>Creative Industries, “meanwhile uses” and flexibility</b></p> <p>The BID is supportive of policies in the area of Creative Industries, although difficult to understand how current planning and land use policies act as a deterrent. The solution to encouraging this sector depends as much on landlord appetite and creating the correct supportive “eco-system” for this sector to thrive, which doesn’t necessarily depend on new (or any) specific development.</p> <p>In planning terms flexibility is key to the encouragement of “meanwhile uses” that should be consistent with existing area specific planning and land use policies. Initiatives that support innovation, curation and new enterprise could extend beyond the stated definition of creative industries and include retail, cafes, restaurants and other enterprises. Flexibility in terms of lease arrangements and affordability will also be factors that should be sensitive to wider commercial interests</p>	<p>Noted and support welcomed. The point made about the general nature of the Regulation 18 draft of the policy is noted, and amendments have been made to more clearly link the policy to objectives outlined in the UK Industrial Strategy and Gatwick 360°, the Coast to Capital LEP Strategic Economic Plan.</p> <p>Noted and support for temporary uses policy is welcomed. The policy text has been amended to explain that the expectation will be to generate footfall and vibrancy, whilst also providing a temporary option for new businesses that may wish to explore the Crawley market. It is hoped that by having a positive planning policy in place to support</p>



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			<p>and business activities to avoid criticisms of distorting the market.</p> <p>There are numerous examples of good practice where this has been successfully achieved in other towns and cities so should be achievable in Crawley for providing new opportunities for experience and experimentation. Planning, however, is unlikely to be the major factor in deterring or encouraging these uses in Crawley.</p> <p>In terms of flexibility, the Local Plan should also be mindful of how the changing and challenging business climate, perhaps most obviously in terms of consumer confidence and retail behaviour, impacts other parts of the town beyond the town centre. The Council may, therefore, have to be prepared to adopt an appropriately flexible approach to County Oak and other out of town retail locations should the demand for this kind of floorspace change.</p> <p><b>*Appendices Attached to Representation*</b></p>	<p>these temporary uses, more creative and innovative business uses may be attracted to Crawley.</p> <p>County Oak is not a designated retail centre, and therefore changes of use in this location to other employment uses would need to be considered on the basis of the relevant Local Plan policies.</p>
REP155/503	West Sussex County Council	Policy EC1	<p><b>WSSC Highways</b></p> <p><b>EC1: Sustainable Economic Growth</b></p> <p>The policy refers to between 44.6 and 57.63 hectares of additional land for business use, on top of 13.19 hectares already identified - assumed to mean already allocated or consented - whilst the supporting text refers to 35 hectares unmet need. At present, although there is a hierarchy of land proposed, it is not yet clear what new employment land will be delivered in the borough over the plan period, what the plot ratio will be – floorspace per site area - nor what the mix is likely to be between different employment uses which have greatly differing density of square metres of floor area per job and proportions of traditional working times versus shift working.</p>	<p>Noted. The initial figures referred to in the Regulation 18 Local Plan have been subject to further work through the Economic Growth Assessment. The Regulation 19 Local Plan is therefore planning for a business land requirement of 33 hectares, which taking account of the current 12 hectares land supply pipeline, results in an outstanding business land requirement of 21 hectares over the Plan period. Based on the council's uncapped housing requirement, there is a potential need for higher growth of 113 hectares business land. The scope to accommodate this within</p>

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			The provision of 44.6 hectares of additional employment space could lead to an increased demand for car travel in the morning peak hour (8-9am) of between approximately 600 and 6000 vehicle trips, depending on these considerations, based on comparison to existing trip generation patterns for towns in Great Britain, excluding Greater London obtained from the TRICS database. This leads to the need for a full transport study to examine potential locations, site density and employment mix and how travel demand should be managed.	Crawley's administrative area will be assessed in full through the Area Action Plan.  Transport modelling will be updated in partnership with WSCC to commence based on the planned figure of 33 hectares business land growth, and will be updated through the Area Action Plan process.
REP155/504	West Sussex County Council	Policy EC3	<b>WSCC Highways</b> <b>EC3: Office Provision</b> Identified need is stated at 169,020 office floorspace, although it is not stated whether this figure is for GIA or external floorspace. Reference to the TRICS database indicates that that this level of GIA floorspace in B1(a) use could lead to 2160 additional motor vehicle trips in the AM peak hour, but this would be associated with a far greater level of uplift in jobs than that suggested in paragraph 9.35 of the supporting text of 2800 jobs. Reference to employment density guidance from the HCA suggests that for this level of jobs to be associated with 169,020 square metres GIA, the employment would need to be at the lowest density of B1(b) research and development. A 50% B1(a) office/50% B1(b) mix would be associated with 5450 jobs at this floorspace leading to 1050 AM peak trips. If floorspace is to be provided for 2800 additional jobs, this would be associated with around 500 AM peak hour trips. This analysis is broad brush and intended to illustrate the need for a transport study to consider this provision and its spatial strategy in more detail.	Noted. As set out above, the Local Plan business land requirement, as informed by the Economic Growth Assessment, has now been updated. Based on the 33 hectare growth figure, a total need is identified for 27,200sqm new office floorspace. The EGA provides further detail on the Northern West Sussex office market, finding that the challenge for Crawley is not one of quantitative office supply, but qualitative, with a lack of Grade A office space suppressing the Crawley office market. The Regulation 19 policy therefore seeks to address the qualitative office supply issue. The updated office figure will be factored into the transport modelling to inform the Local Plan. Any possible increase beyond this figure, as part of a Baseline Labour Supply scenario, would form part of the transport modelling to inform the Area Action Plan.
REP171/592	FTDJohns	Policy EC3	My concerns are simply that there is not the demand for office space currently, nor has there been for some time. To	Noted. Policy EC5 (Office Provision) is not seeking to promote office uses over other

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			<p>suggest that demand for office space is likely to increase and be favoured over industrial and logistics development on Manor Royal is wrong, in my opinion. I am aware that far more business rates are payable in respect of office development, but more parking is also required which is one reason why the 100,000 sq ft Nova scheme was not built adjacent to Astral Towers and Gatwick 33 was developed in its place.</p>	<p>uses. The EGA identifies need for a minimum 27,200sqm office floorspace, and 103,700sqm industrial floorspace over the Plan period, and the Local Plan sets in place a framework that supports the delivery of both. The EGA also identifies specific qualitative issues relating to Crawley's office floorspace, with much of the stock not of the quality/type that is sought by the market. This is to an extent reflected in the high vacancy rates for offices at Manor Royal. The overall qualitative issue is serving to repress the office market in Crawley's, and there is an opportunity for economic growth if offices of the right quality and type can be delivered.</p> <p>The policy is therefore seeking to encourage the delivery of Grade A offices within the Main Employment Areas. To help achieve this, the policy removes the NPPF requirement that planning applications for office development outside the Town Centre satisfy the sequential test. By removing this requirement for office uses, the Local Plan recognises that the Main Employment Areas are appropriate locations for office uses. In being positive to support high quality office uses, the policy is not seeking to preferentially support office uses at the expense of other business uses. Rather, it is seeking to address an identified qualitative provision issue and provide a supporting framework through which to help achieve this.</p>

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				The point re: parking is noted. This is an issue through Manor Royal. The Local Plan will be informed by transport modelling, to be undertaken in liaison with WSCC, to ensure that the highways impacts of development are appropriately planned for. Site specific parking issues will vary on a case-by-case basis, and would need to be considered at the planning application stage.
REP172/595	Vail Williams on behalf of Jersey Farm landowners	Policy EC1	<p><b>Strategic policy EC1 Sustainable Economic Growth</b></p> <p>This policy now identifies in the reasoned justification paragraph 9.12, that the emerging 2019 EGA shows a provisional business land need of between 44.6 and 57.6 hectares over the plan period up to 2035.</p> <p>It is recognised that this will also consider the Horley Business Park allocation under Reigate and Banstead and that further work in terms of the evolution of the policy about how this new business location will sit together with Main Employment Areas in Crawley, will need further joint working with neighbouring authorities.</p> <p>However, the land use of this new allocation, should consider how it complements or competes with the new floorspace at Horley and its associated timeframe for delivery. It is expected that the new EGA will consider this further, alongside other large strategic employment sites being proposed and developed in the wider region.</p> <p>Criteria 1 of policy EC1 however, states that to ensure Crawley recognises the economic role and function of the wider town, they will look to build upon and protect the role of Manor Royal as a key business location, particularly for B Use Classes, whilst recognising the importance of the area at</p>	<p>Noted. The initial figures referred to in the Regulation 18 Local Plan have been subject to further work through the Economic Growth Assessment. The Regulation 19 Local Plan is therefore planning for a business land requirement of 33 hectares, which taking account of the current 12 hectares land supply pipeline, results in an outstanding business land requirement of 21 hectares over the Plan period. Based on the council's uncapped housing requirement, there is a potential need for higher growth of 113 hectares business land. The scope to accommodate this within Crawley's administrative area will be assessed in full through the Area Action Plan.</p> <p>Support for the approach of Policy EC1 is welcomed. It will be for the Area Action Plan to assess whether the Baseline Labour Supply figure can be accommodated within Crawley, but until such time as the AAP is adopted, the need to maximise the use of</p>

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			<p>the heart of Gatwick Diamond. This is supported by our clients.</p> <p>Criteria 2 states that the Borough's Main Employment Area should also be protected in order to retain the focus for sustainable economic growth, is also supported and considered appropriate given the land supply position within the region.</p> <p>Criteria 3 introduces and encourages the redevelopment and intensification of under-utilised sites in Main Employment Areas, which is also relevant in regard to the efficient use of land. Criteria 4 specifically relates to minor extensions to Manor Royal where this would deliver additional B Class business land providing it is consistent with other Local Plan policies. This is consistent with the ambitions of the landowners across these nine sites which identify a further land supply of over 23 ha.</p> <p>There is also reference in policy EC1 for the opportunities of 13.19 hectares of employment land already identified within the Borough, in order to meet the short-term economic need. However, it is clear that CBC consider that the longer-term economic need remains unmet. The policy continues to recognise that the majority of land required to meet the full economic need of the area of between 44.6ha to 57.63 ha, will necessitate an identification of a new strategic employment location or locations within the Plan period.</p> <p>The policy also continues by stating that any strategic employment locations will need to be of a scale and function that help identify quantitative and qualitative needs for business development, complementing the role of Manor Royal. The policy also commits to a hierarchy for the new strategic development, similar to that stated in the previous</p>	<p>Crawley's available business land supply remains pressing.</p> <p>The text of Policy EC1 has been amended to make clear that the AAP will assess if and how Crawley's outstanding business land requirement might be accommodated within Crawley's administrative area.</p> <p>The council notes the land that has been promoted by Vail Williams for employment use through the Local Plan 'call for sites'. This land has been included in the Employment Land Trajectory, along with other sites that have been promoted to CBC for employment growth. The scope to accommodate Crawley's outstanding employment land requirement in the borough boundary will be assessed in full through the AAP.</p> <p>Support for the previous Area of Search in the safeguarded area is noted. The council does not consider the government's draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place.</p>

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			<p>Local Plan, firstly for land within Crawley to the north of the Borough, then land at Crawley/Gatwick immediately adjoining the Borough, and then land near Crawley/Gatwick.</p> <p>The area of search for future employment land, as shown on the Proposed key diagram is therefore supported (as shown on page 15) but it would assist if this is shown and clarified clearly on the Local Plan and key diagram in relation to the safeguarded land and the western relief road.</p> <p>It is also considered that additional clarification may be required regarding criteria C, to identify where the land near Crawley/Gatwick is. It is assumed that this will be considered as part of the evolving 2019 EGA undertaken by Lichfields (of which Vail Williams took part) as well as the defined area of search for an employment location, so that the policy continues to be clear that the preferred location for any strategic employment location is to the north of Manor Royal or the south or east of Gatwick Airport.</p> <p>It also identifies that given current safeguarding of this land for the potential additional runway at Gatwick, work will be required to identify an appropriate site or sites for further strategic employment business development and, that this will only take place after the position regarding safeguarding has been determined. It is unclear how this will sit within the identified time frame for the adoption of the new local plan, and any emerging Aviation Paper from Central Government.</p> <p>As land owners within the identified preferred site for a strategic employment location to the North of Manor Royal, we therefore consider that the 23.6 hectares identified across the whole of the nine sites could be considered within the area of search for a strategic employment location, and that master planning in order to ensure suitable delivery in</p>	<p>Therefore the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. The Regulation 19 Local Plan does not therefore retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for economic development within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area</p>

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			<p>regards to any phasing, could be achieved within the Local Plan period, especially if safeguarding is removed. This is endorsed by our 9 submissions for the parallel “call for sites” currently being undertaken by Crawley Borough Council.</p> <p>Further comment on the removal of safeguarding will be considered under the Gatwick policies later in this letter.</p> <p>Paragraph 9.15 of the reasoned justification for policy also states that there is a slight reduction from 57.9 hectares to 57.63 hectares in regard to the requirement for B Class land use. However given the position stated in policy EC1 and the reasoned justification in 9.16, it is considered that there is still a clear shortfall in land availability, and that even the slight reduction in hectares of development required since 2015, the strategic employment location should still be considered within the area of search as still identified. This is therefore endorsed by our clients.</p>	
REP172/596	Vail Williams on behalf of Jersey Farm landowners	Policy EC2	<p>In regard to the main employment areas, strategic policy EC2 “Economic Growth in Main Employment Areas” identifies Manor Royal as a main employment area and this continues the approach into the 2015 Crawley Local Plan. The policy also ensures that development would not result in a net loss of employment land, unless it is no longer suitable or viable, or that any loss of land would result in the wider social, environmental and economic benefit, and that there is no adverse impact on the economic function for any of the main employment areas.</p> <p>The need to ensure that the economic function of main employment areas, enhance economic function is also considered to be important to ensure growth in the employment areas.</p>	Noted and support welcomed. Given Crawley’s currently limited available business land supply pipeline, it is vital that the Main Employment Areas are protected for economic development.

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REP172/597	Vail Williams on behalf of Jersey Farm landowners	Policy EC3	<p>Strategic policy EC3 “Office Provision” is a new policy dealing with office provision and states that the office sector (B1a and B1b) is a key growth area in Crawley with potentially 25 hectares of land identified from the plan period up to 2035. It also identifies that in the main employment areas, such Use Classes will be supported where it adds to the overall stock of grade A offices and makes for efficient use of land.</p> <p>Whilst this is considered essential to overall economic land supply, the emerging 2019 EGA equates the Use Class requirement back to 169,000 sq m. From our experience in the market, we would question the need to solely highlight this as an area of growth, given that there is a significant amount of deficiency for B2 and B8 and that some of the B1 development requirement is actually reducing.</p> <p>Whilst it is appreciated that the Local Plan period is up to 2035, there is concern that specific identification of only B1a or B1b requirement may hinder the market in delivering a mix of uses and therefore may not be considered flexible across the Plan period.</p>	<p>Noted. Policy EC5 (Office Provision) is not seeking to promote office uses over other uses. The EGA identifies need for a minimum 27,200sqm office floorspace, and 103,700sqm industrial floorspace over the Plan period, and the Local Plan sets in place a framework that supports the delivery of both. The EGA also identifies specific qualitative issues relating to Crawley’s office floorspace, with much of the stock not of the quality/type that is sought by the market. This is to an extent reflected in the high vacancy rates for offices at Manor Royal. The overall qualitative issue is serving to repress the office market in Crawley’s, and there is an opportunity for economic growth if offices of the right quality and type can be delivered.</p> <p>The policy is therefore seeking to encourage the delivery of Grade A offices within the Main Employment Areas. To help achieve this, the policy removes the NPPF requirement that planning applications for office development outside the Town Centre satisfy the sequential test. By removing this requirement for office uses, the Local Plan recognises that the Main Employment Areas are appropriate locations for office uses. In being positive to support high quality office uses, the policy is not seeking to preferentially support office uses at the expense of other business uses. Rather, it is seeking to address an identified qualitative</p>



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				provision issue and provide a supporting framework through which to help achieve this.
REP172/598	Vail Williams on behalf of Jersey Farm landowners	Policy EC4	Strategic policies EC4 “Visitor Accommodation” and EC5 “Night-Time Economy” are not specifically relevant to the site or the Consortium however, we would support flexibility for such uses where they support a main employment area. However, it is not necessary to highlight this under new policies and the overarching main employment area policies could cover such uses and provide further clarity. In order to assist the reader using the document, it does feel that these occur at an unusual point in the structure and order of the chapter therefore, it may be considered that the strategic policy EC6 “Employment and Skills Development” follows after EC3.	Noted. These policies have been amended to more clearly provided specific guidance for relevant planning applications.  The Economy Chapter structure has been amended to ensure these policies are located at a more logical point.
REP172/599	Vail Williams on behalf of Jersey Farm landowners	Policy EC6	In regard to strategic policy EC6 “Employment and Skills Development” whilst it is appreciated the employment skills and development programme is important, the identification of the need for any local planning application to be submitted and supported by an employment and skills plan and method statement, raises concern in regard to the fact that any Section 106 will need a minimum requirement of 20% of total jobs, created by the construction of qualifying development to be secured for local residents. This will be particularly complicated when relating to speculative development, and will be extremely hard to achieve, and may stifle development at the planning stage.  The developer contribution towards employment skills initiatives is acknowledged however, it is not clear from the reasoned justification quite how these financial contributions may be apportioned to a development and the how these mechanisms other than through the Section 106 may be	Noted. Policy EC4 (formerly EC6) represents an important opportunity to ensure that major development contributes, on a proportionate basis, to addressing the existing social mobility and skills gap in Crawley. This is consistent with priorities identified in the Crawley Employment and Skills Programme. The objectives of the policy are twofold. First, the policy requires that an Employment and Skills Plan will be agreed between the developer and council to help support the use of local apprenticeships and labour during the construction phase of development. Secondly, a financial contribution will be sought towards providing training and support through Employ Crawley, for those individuals that require support in accessing sustainable employment. The level of contribution sought

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			<p>agreed. Therefore, further information on how these may be identified would be requested in the reasoned justification or cross referenced.</p> <p>There is concern that this will adequately address the principle of policy EC6 on employment and skills development, or if at development management level it may actually hinder the planning process rather than assist in local job creation.</p>	<p>will be proportionate to the type and amount of development proposed. This will be detailed in the Local Plan Planning Obligations Annex. It will also be subject to viability testing to ensure that it is not overly burdensome and that the Local Plan is sound. Further to feedback, the application of the policy has been review. It is appreciated that requiring information on an Employment and Skills Plan is not practical at the application phase. Therefore the council will seek a commitment from the applicant that an Employment and Skills Plan will be prepared and submitted by the applicant, in agreement with the council, prior to the commencement of development. This will be secured by way of S106 agreement. The approach will enable the detail of the ESP to be negotiated once it is known that planning permission has been granted, enabling the developer to proceed with certainty, and work with the council to prepare the ESP prior to the demolition/construction phase.</p>
REP172/600	Vail Williams on behalf of Jersey Farm landowners	Policy EC7	<p>Strategic policy EC7 "Creative Industries" positively identifies those that will be considered and supported however, it is questioned whether there is actually a need for such a policy and what the planning and spatial planning elements would be to enable strategic policy EC7 to be robustly supported at examination. Further information regarding what any property or spatial needs may be as part of this policy, may also assist the development of the economic growth policies.</p>	<p>Noted. It is agreed that Policy EC7 as worded in the Regulation 18 required further detail to be effective. The policy text has now been amended to take account of the UK Industrial Strategic, and specifically objectives set out in Gatwick 360°, the Coast to Capital LEP Strategic Economic Plan.</p>

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			Again the structure for the economic growth chapter appears to be slightly disjointed with policy EC8 “Flexible Temporary Art and Creative Uses” then separating Manor Royal as a main employment area given the significance of this employment area. Therefore, it is recommended that this is moved further to the front of the chapter.	Economic Growth chapter has been restructured to read in a more logical manner.
REP172/601	Vail Williams on behalf of Jersey Farm landowners	Policy EC9	<p>Strategic policy EC9 “Manor Royal” states that development that is compatible with the area’s function and role would be permitted, especially where it falls within Use Class B and results in the reuse, intensification or change of use of land or buildings. It also states that proposals that are not for B Use Class will be permitted if they can demonstrate that they are of a scale and function that enhances and does not undermine the established role and function of Manor Royal. The strategic policy EC9 continues to say that development at Manor Royal should contribute positively to the overall setting and environment of the main employment area through high quality design and landscaping, making reference to the 2015 Manor Royal Design Guide Supplementary Planning Document.</p> <p>Our clients would wish to understand whether or not the 2015 Manor Royal Design Guide SPD and the associated public realm strategy are also considered to be updated as part of the Local Development Strategy, in order to support the new strategic policy EC9.</p> <p>Policy EC9 also identifies for the “proportion of financial contributions being toward public realm improvements” in Manor Royal. Again, we would seek clarification as to whether this is still the £2 per sqm as stated in the SPD on financial contributions or how this level can be determined by</p>	Noted. The Manor Royal Design Guide SPD will be updated following adoption of the Local Plan. The intention is to retain the figure of £2 per sqm for the Manor Royal contribution. Further detail will be set out in the Local Plan Planning Obligations Annex. This figure will be subject to viability testing as part of the whole plan viability assessment.

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			potential land developers, when considering financial implications.	
REP172/606	Vail Williams on behalf of Surrey County Council	Policy EC1	<p><b>Strategic policy EC1 Sustainable Economic Growth</b></p> <p>Policy EC1 now identifies in paragraph 9.12, that the emerging 2019 EGA shows a provisional business land need of between 44.6 and 57.6 hectares over the plan period up to 2035. We therefore agree that any opportunity to increase your supply position, and that allows the development of new employment opportunities in the areas to help meet the 57.6 ha requirement, will further support our development of the site in the Manor Royal Main Employment Area.</p> <p>Criteria 1 of policy EC1 however, looks to ensure that Crawley recognises the economic role and function of the wider town, whilst also protect the role of Manor Royal as a key business location. This particularly supports B Use Classes, whilst recognising the importance of the area at the heart of Gatwick Diamond, and this is further supported by our clients.</p> <p>Criteria 2 states that the Borough's Main Employment Area should also be protected in order to remain the focus for sustainable economic growth is also supported and considered appropriate given the land supply position within the region.</p> <p>Criteria 3 encourages the redevelopment and intensification of under-utilised sites in Main Employment Areas, which is also relevant in regard to the efficient use of land. This is fully consistent with the ambitions of SCC land owners across their site.</p> <p>Policy EC1 states that there is approximately 13.19 hectares of opportunities for existing employment land already identified in the Borough, in order to meet the short term</p>	Noted and support welcomed. The Surrey County Council site is included within the Employment Land Trajectory and forms part of Crawley's employment land supply pipeline.

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			<p>economic need. However, it is considered that the longer term economic need remains unmet. The policy also recognises that the majority of land required to meet the full economic need of the area may be between 44.6ha to 57.63 ha, but this will necessitate an identification of new strategic employment location or locations within the Plan period.</p> <p>Whilst our client recognises that all opportunities to maximise existing employment floorspace should be supported, we also would wish it to be noted that they have every intention to deliver the site in the short term 0-5 years.</p> <p>To support the need for an adequate land supply, Paragraph 9.15 of the reasoned justification for policy also states that whilst there is a slight reduction from 57.9 hectares to 57.63 hectares in regard to the requirement for B Class land use, there is still a clear shortfall in land availability. This is therefore endorsed by our clients.</p>	
REP172/5607	Vail Williams on behalf of Surrey County Council	Policy EC2	Strategic policy EC2 identifies Manor Royal as a main employment area and ensures that development would not result in a net loss of employment land, unless no longer suitable or viable or any loss of land would result in the wider social, environmental, economic benefit and there is no adverse impact on the economic function of any of the main employment areas.	Noted.
REP172/608	Vail Williams on behalf of Surrey County Council	Policy EC3	Strategic policy EC3 is a new policy dealing with office provision and states that the office sector (B1a and B1b) is a key growth area in Crawley with potentially 25 hectares of land identified from the plan period up to 2035. It also identifies that within the main employment areas, such Use Classes will be supported where it adds to the overall stock of grade A offices and makes for efficient use of land. Whilst this is considered an area of essential land supply, (with the	Noted. Policy EC5 (Office Provision) is not seeking to promote office uses over other uses. The EGA identifies need for a minimum 27,200sqm office floorspace, and 103,700sqm industrial floorspace over the Plan period, and the Local Plan sets in place a framework that supports the delivery of both. The EGA also identifies specific qualitative issues relating to

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			emerging 2019 EGA equates the Use Class requirement back to 169,000 sq m), there is concern that, whilst the Local Plan period runs up to 2035, the specific identification of only B1a or B1b requirement may hinder the market in delivering a mix of uses and therefore is considered not to be flexible across the Plan period. Our client would support any positive flexibility to use classes across the Manor Royal Business District.	<p>Crawley's office floorspace, with much of the stock not of the quality/type that is sought by the market. This is to an extent reflected in the high vacancy rates for offices at Manor Royal. The overall qualitative issue is serving to repress the office market in Crawley's, and there is an opportunity for economic growth if offices of the right quality and type can be delivered.</p> <p>The policy is therefore seeking to encourage the delivery of Grade A offices within the Main Employment Areas. To help achieve this, the policy removes the NPPF requirement that planning applications for office development outside the Town Centre satisfy the sequential test. By removing this requirement for office uses, the Local Plan recognises that the Main Employment Areas are appropriate locations for office uses. In being positive to support high quality office uses, the policy is not seeking to preferentially support office uses at the expense of other business uses. Rather, it is seeking to address an identified qualitative provision issue and provide a supporting framework through which to help achieve this.</p>
REP172/609	Vail Williams on behalf of Surrey County Council	Policy EC4	Strategic policy EC4 suggests a more flexible approach to visitor accommodation where it may cater for the needs of Manor Royal and its economic function. Flexibility for uses outside of the B classes is also welcomed by our clients, to ensure maximum opportunity that will support existing and potential new business development and retention of key employers such as L3 Harris and SECamb.	<p>Noted and support welcomed.</p> <p>The policy has been strengthened to make clear that any hotel development in Manor Royal will be required to demonstrate how business supporting facilities and staff amenities will be incorporated into the</p>

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				development and the scope of this to form a dedicated business hub.
REP172/610	Vail Williams on behalf of Surrey County Council	Policy EC6	<p><b>Strategic policy EC6 Employment and Skills Development.</b></p> <p>Whilst it is appreciated the employment skills and development programme is important, the identification of the need for any local planning application to be submitted and supported by an employment and skills plan and method statement, raises some concern in regard to, the fact that any Section 106 will need a minimum requirement of 20% of total jobs created by the construction of qualifying development to be secured for local residents. This will not be possible in regard to speculative development, and will be extremely hard to achieve, and therefore may stifle development at the planning stage.</p> <p>The developer contribution towards employment skills initiatives is acknowledged, but it is not clear from the reasoned justification quite how these financial contributions may be apportioned to a development and the mechanism other than through the Section 106, therefore further clarity is required.</p>	<p>Noted. Policy EC4 (formerly EC6) represents an important opportunity to ensure that major development contributes, on a proportionate basis, to addressing the existing social mobility and skills gap in Crawley. This is consistent with priorities identified in the Crawley Employment and Skills Programme. The objectives of the policy are twofold. First, the policy requires that an Employment and Skills Plan will be agreed between the developer and council to help ensure that local apprenticeships and labour can be used during the construction phase of development. Secondly, a financial contribution will be sought towards providing training and support through Employ Crawley, for those individuals that require support in accessing sustainable employment. The level of contribution sought will be proportionate to the type and amount of development proposed. This will be detailed in the Local Plan Planning Obligations Annex. It will also be subject to viability testing to ensure that it is not overly burdensome and that the Local Plan is sound. Further to feedback, the application of the policy has been review. It is appreciated that requiring information on an Employment and Skills Plan is not practical at the application phase. Therefore the council will seek a commitment from the applicant that an</p>

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				Employment and Skills Plan will be prepared and submitted by the applicant, in agreement with the council, prior to the commencement of development. This will be secured by way of S106 agreement. The approach will enable the detail of the ESP to be negotiated once it is known that planning permission has been granted, enabling the developer to proceed with certainty, and work with the council to prepare the ESP prior to the demolition/construction phase.
REP172/611	Vail Williams on behalf of Surrey County Council	Policy EC7	Strategic policy EC7 on creative industries, is supported, but it is unclear what this may look like in regard to B Class Uses in Manor Royal, with many firms being outside standard Use Classes and could be Sui Generis. How this policy links with EC9 is therefore, an area that should be considered further for the Regulation 19 stage.	Noted and support welcomed. It is agreed that Policy EC7 as worded in the Regulation 18 required further detail to be effective. The policy text has now been amended to take account of the UK Industrial Strategy, and specifically objectives set out in Gatwick 360°, the Coast to Capital LEP Strategic Economic Plan.
REP172/612	Vail Williams on behalf of Surrey County Council	Policy EC9	Strategic policy EC9 on Manor Royal states that development which is compatible with the area's function and role would be permitted especially where it falls within Use Class B and results in the reuse, intensification or change of use of land or buildings. It also states that proposals that are not for B Use Class will be permitted only if they can demonstrate that they are of a scale and function that enhances and does not undermine the established role and function of Manor Royal.  EC9 also states that development at Manor Royal should contribute positively to the overall setting and environment of the main employment area through high quality design and landscaping and makes reference to the 2015 Manor Royal	Noted and support welcomed. For clarity, the intention is to retain the figure of £2 per sqm for the Manor Royal contribution. Further detail will be set out in the Local Plan Planning Obligations Annex. This figure will be subject to viability testing as part of the whole plan viability assessment.



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			<p>Design Guide Supplementary Planning Document. This is consistent with the high-quality developments already provided by SCC at parcels one and two of the Nexus development. It also identifies a “proportionate financial contribution toward public realm improvements in Manor Royal”, but we seek clarification as to whether this is still the £2 per sq m as stated in the SPD.</p> <p><b>Conclusions</b> On behalf of SCC, we are grateful for the opportunity to comment on the Regulation 18 Issues and Options Consultation and would seek further to engage directly with the Council in regard to the key matters effecting general economic policies.</p>	
REP174/625	Gatwick Airport Limited		<p><b>Chapter 9 Economic Growth</b> The overarching position of the draft Plan with a presumption in favour of sustainable development GAL supports and is in line with GALs aspiration to develop and intensify the economic activities and employment profile of the airport. The airport is a significant generator of economic value for London and the South east economies. The airport campus offers a wide diversity of jobs which in turn require a spectrum of skills sets and capabilities. It is important for the draft Plan to ensure the economic benefits and opportunities from the airport are fully realised for the benefit of Crawley and the surrounding area as well as sub regional, regional and national economies. This includes ensuring the maximum and efficient use of land at the airport for further development.</p>	Noted. Gatwick Airport remains designated as a Main Employment Area through Local Plan Policy EC2 and the Plan supports the efficient use of land at the airport, which includes ensuring that non-airport related uses are only permitted where this will not have detrimental effect on the long term ability of the airport to meet its floorspace needs as it grows (Policy GAT3).
REP174/626	Gatwick Airport Limited	Policy EC1	<p><b>Policy EC1 Sustainable Economic Growth Consultation Question – How can the draft Plan seek to accommodate Crawley’s employment needs?</b></p>	Support for EC1 noted. However, the council does not consider the government’s draft Aviation Strategy, Aviation

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			<p>Overall GAL support the role of Manor Royal as a key business location for Crawley. We support minor extensions to Manor Royal provided that new development does not encroach into the designated area of safeguarded land. GAL also support CBC joint working with neighbouring local authorities in identification of employment land. The hierarchy set out in Policy EC1 is considered to be appropriate. GAL strongly supports the final paragraph of Policy EC1 as land around Gatwick continues to be safeguarded by national policy. GAL considers that following the final paragraph of the policy there should be the insertion of text to cross reference to Policy GAT2 Option 1.</p>	<p>2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place.</p> <p>Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the Regulation 19 Local Plan does not retain the safeguarded land designation or Policy GAT2. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for economic development within the AAP area</p>

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				will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area
REP174/627	Gatwick Airport Limited	Policy EC2	<p><b>Policy EC2 Economic Growth in the Main Employment areas</b></p> <p><b>Consultation Question – Does the Policy designate the correct Main Employment Areas?</b></p> <p>GAL supports the overall vision promoted in the draft Plan particularly the strategic importance of the airport in the future development and economic growth of Crawley and the wider sub region. We welcome in the draft Plan the clear recognition of the airport as a core economic driver of the borough and the airport being a key contributor to economic buoyancy of Crawley. GAL supports within Policy EC2 the identification of Gatwick Airport as a focus for economic growth and supports proposals for new employment generating development where it makes an efficient use of land or buildings.</p> <p>GAL supports the growth of Manor Royal and Crawley Town Centre as key employment areas for the borough. Whilst GAL recognises the inclusion of para 9.32 which identifies the need for new development proposals in Lowfield Heath to be cross referenced to Policy GAT2 (Option 1) we strongly object to proposals in the draft Plan for promoting a main employment area in Lowfield Heath which clearly falls within the land which is currently safeguarded for an additional runway to the south of the airport.</p> <p>Whilst the normal planning position is that the LPA should plan to meet future employment needs for the draft Plan period, CBC, has indicated that as a result of the uncertainty</p>	<p>Noted and support for EC2 welcomed.</p> <p>Lowfield Heath has long had an established employment function and its Main Employment Area designation reflects this. Notwithstanding the previous safeguarding designation, and the Local Plan's AAP designation, (see above), there remains scope for the reuse and extension of existing buildings in this area.</p> <p>The EGA also provides a constrained, past trends scenario of 33ha need which is the level of growth the Local Plan plans for. There is an unmet need of 21ha, and ongoing</p>

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			over safeguarded land, there cannot be certainty that the potential additional employment land can be delivered. GAL considers that this uncertainty could be mitigated by Council working with the adjoining authorities of Reigate and Banstead, Mole Valley and Horsham under the Duty to Cooperate.	liaison is taking place with RBBC to determine how much of this could be met by the Horley Business Park, and with other neighbouring authorities through the duty to Cooperate.
REP174/628	Gatwick Airport Limited	Policy EC4	<p><b>Policy EC4: Visitor Accommodation</b>  <b>Consultation Question – The application of the sequential and impacts test would potentially protect Main Employment Areas outside of the town centre as visitor accommodation is a main town centre use. Is this sufficient to use without further policy specification for visitor accommodation?</b></p> <p>GAL strongly supports that visitor accommodation outside of the airport boundary will only be permitted where it can be demonstrated that proposals will not be serving visitor needs associated with travelling to and from the airport and or related to off airport car parking. GAL requires that in addition to the supporting text of para 9.42 that there should following the final paragraph of the policy the insertion of a cross reference to Policy GAT3.</p> <p>GAL considers that new visitor accommodation within the airport boundary should not be required to undertake the sequential test where a planning application is required. GAL strongly requests that that the policy text is amended to:  The text below sets out how new text to be inserted in <i>italics</i>.  '<i>In all other main employment areas (outside of the airport boundary) hotel and visitor accommodation will be supported subject to the sequential and impact tests set out in Policy TC5.</i>'</p>	<p>Noted. Hotels are a main town centre use and can support the vitality and viability of the town centre. The Policy therefore supports hotels in the town centre, and requires that where such uses are proposed outside of the Town Centre, that the sequential test is applied. In Manor Royal, hotels should cater for the specific business needs of MR and not visitor needs associated with travel to and from the airport.</p> <p>Support for the control of off airport car parking in off airport hotels is welcomed.</p>

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REP176/643	Savills on behalf of Bellway Homes Limited	Policy EC2	<p><i>Strategic Policy EC2: Economic Growth in Main Employment Areas</i></p> <p>As part of the emerging Local Plan we note that the Council is proposing to retain its approach to economic growth, i.e. focusing growth within designated 'Main Employment Areas' in the first instance. Strategic Policy EC2 states that employment generating development will be supported in such areas, whilst development that would involve a net loss of employment land or floorspace will only be permitted where it meets a number of criteria.</p> <p>In the context of the Former TSB Site, we note that the Council is still proposing to include this within the Three Bridges Corridor Main Employment Area. Given Strategic Policy H2 (as discussed above) the location of the Former TSB Site within this Main Employment Area is completely at odds with the overriding policy objective for the site (i.e. the delivery of housing). This is the same situation for the EDF Building site to the immediate west of the site and the eastern half of the Sutherland House site to the immediate north (both of which are also allocated for housing within the emerging Local Plan document but are still located within the Main Employment Area boundary).</p> <p>Given the above, it is respectfully requested that the Three Bridges Corridor Main Employment Area be amended to exclude the Former TBS Site as a minimum. This will ensure that there are no policy conflicts within the new Local Plan and help to facilitate the delivery of housing on the site.</p>	Agree. It is accepted that given the current consents for residential development, there is a clear residential focus in this particular part of the Three Bridges Corridor. Mapping has been amended accordingly.
REP177/658	The Woodland Trust	Policy EC2	<p><b>Economic Growth</b></p> <p>Policy EC2 – Development which would result in the loss of ancient woodland, aged or veteran trees should not be permitted. We have concerns about the designation of Tilgate</p>	Noted. Both sites retain their Main Employment Area designations, reflecting their existing employment function which is continued from the adopted Plan. Any

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			Forest and Lodge as a Main Employment Area, given its proximity to ancient woodland (Grid reference: TQ2704334553). We have concerns about the designation of The Hawth as a Main Employment Area given its proximity to ancient woodland (Grid reference: TQ2775536062). As a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.	application will be required to have regard to nearby ancient woodland in accordance with Natural England's standing guidance.
REP178/672	FirstPlan on behalf of Crawley Goods Yard Operators	Policies EC1, EC2, and EC9	Crawley Goods Yard is also part of the Manor Royal Employment Area and therefore draft Policies EC1, EC2 and EC9 are relevant. These draft policies seek to protect the employment area for employment uses and encourage intensification of underutilised sites. The Goods Yard operators are generally supportive of these policies and have no detailed comments on them.	Noted and support welcomed.
REO178/673	FirstPlan on behalf of Crawley Goods Yard Operators	Policy EC10	Draft Strategic Policy EC10 concerns <i>'Employment Development and Residential Amenity'</i> . We note that this is similar to adopted Policy EC4 but with additional text requiring that <i>"The residential use must be designed to mitigate any impact from the existing employment use on new residents."</i> This additional text is strongly supported.  In response to the consultation questions for Policy EC10, the policy is considered to be necessary. The increased emphasis on the "agents of change" within the NPPF gives the requirement for this policy further weight. Paragraph 182 of the NPPF requires that planning policies ensure that new development can be integrated effectively with existing	Noted and support welcomed.  Noted and support welcomed.

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			<p>businesses and community facilities and draft Policy EC10 responds to this, it is therefore a sound approach. Draft Policy EP4 “<i>Development and Noise</i>” is much more general in its approach and therefore both policies are considered to be required.</p> <p>With regard to whether Policy EC10 should have more detailed criteria for the different main employment areas, we consider that this is not necessary as the policy needs flexibility to respond to different situations where there is potential for conflict between employment and new residential uses. However, this is provided that draft Policy H2 continues to have specific wording regarding the potential impact of the Tinsley Lane Site Allocation on The Crawley Goods Yard.</p>	Noted and support welcomed.
REP179/675	Savills on behalf of the Wilky Group	Policy EC1	<p><b>1.0 Introduction</b></p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG or Wilky), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. It relates to Chapter 9, Economic Growth, and specifically Policy EC1, Sustainable Economic Growth in the draft Crawley Borough Local Plan, 2019 (DCBLP).</p> <p>1.2 TWG owns about 63.3 ha (149 acres) of land east of Gatwick Airport and north and south of the M23 spur road between Junctions 9 and 9a. The plan at <b>Appendix 1</b> shows the extent of the opportunity in the Gatwick/Crawley/Horley area, including Gatwick Green (59 ha). Wilky and Aberdeen Standard Investments are discussing how they can work together in respect of Wilky’s strategic landholding adjacent to Gatwick Airport to bring forward an integrated mixed use development and co-ordinated infrastructure solution. In the</p>	<p>Support for removing safeguarding noted. The council does not consider the government’s draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place.</p> <p>Therefore the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the</p>

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			<p>adopted Crawley Borough Local Plan 2015 (CBLP), the Wilky land south of the M23 spur road (about 47.3 ha / 117 acres) forms a small part of the land that is 'Safeguarded' for a second runway at Gatwick Airport: TWG's land is required for landside facilities. Consequently, the Council has been unable to allocate the land, and instead has designated it as part of an Area of Search for a Strategic Employment Location (SEL) under adopted Policy EC1 (Sustainable Economic Growth). The Council intends to select one or more SELs in the event there is no longer a case to safeguard land for the second runway. TWG's landholdings within the Area of Search make it a major stakeholder in relation to the future of the local economy and its continued and sustainable economic growth.</p> <p>1.3 The representation will address the consultation question set out on page 94 of the DCBLP:</p> <ul style="list-style-type: none"> <li>• How best can the Local Plan seek to accommodate Crawley's identified employment needs?</li> </ul> <p>1.4 Reference will be made to the significant and acknowledged demand for employment floorspace in the Crawley/Gatwick area at the 'Heart of the Gatwick Diamond', and the variable quality of existing building stock to meet the needs of corporate and knowledge-based occupiers. The case is also made for such provision to be in the form of high-quality and flexible office and industrial development for B1/B2/B8 and related uses in a high density masterplanned business quarter that is connected by multiple modes of transport on land east of Gatwick Airport.</p> <p>1.5 Evidence is put forward to demonstrate that the regional/sub-regional demand for strategic employment floorspace and economic infrastructure is far greater than</p>	<p>Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for economic development within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.</p>



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			<p>identified in the Council's geographically-limited North West Sussex Economic Growth Assessment (EGA, 2019), and that such growth should be focused at Gatwick Green on land east of the Airport. National planning policy and guidance requires that CBC must plan positively to address its economic needs and that this is critical to achieving a Local Plan that is sound. The representation will set out why Policy EC1 is not considered to be sound in accordance with the four elements of the test contained in the NPPF (para 35).</p> <p><b>2.0 National policy &amp; guidance on economic development</b></p> <p>2.1 The NPPF (February 2019) notes that local planning authorities should place significant weight on supporting economic growth and productivity taking account of local business needs and wider opportunities for development. Policies should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. In particular, areas with high levels of productivity should be allowed to capitalise on their potential so that Britain can be a global leader in innovation: driving productivity improvements is the core vision contained in the Government's Industrial Strategy. The NPPF goes on to require planning policies to proactively and positively encourage sustainable economic growth with regard to Local Industrial Strategies (LISs); identify strategic sites for inward investment; address any barriers to investment, and incorporate flexibility to accommodate needs not articulated in the plan. Also highlighted is the need to plan for storage and distribution uses and take account of their specific locational requirements (paras 80-82).</p>	

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			<p>2.2 Government guidance on providing for economic development needs is set out in Planning Practice Guidance (PPG - 025 Ref IDs: 2a-025-20190220 to 2a-032-20190722). To ensure robust evidence on business needs, local authorities should liaise closely with the business community and take account of Local Industrial Strategies (LISs). Councils should take a 'best fit' Functional Economic Market Area (FEMA) and then assess the existing employment land stock; the pattern of land supply and loss; evidence of market demand from local data, market intelligence, surveys of business needs, discussions with developers / agents and evidence from business forums; wider market signals on growth, diversification and innovation, and any evidence of market failure. Above all, this requires close liaison with the business community to understand current and future requirements.</p> <p>2.3 In relation to market signals, PPG states that Councils need to look at current and robust data on labour demand (jobs/employment forecasts), labour supply (demographically derived forecasts of the economically active population, i.e. future employees); the trends in take-up of employment land; future property market requirements, and consultation with relevant organisations and study business trends, models and employment statistics, taking account of longer term economic cycles. This work will reveal any quantitative or qualitative mismatches in demand and supply and which market segments are under or over-supplied. Local Authorities should look at a range of robust data to understand the requirements for office, general business and distribution space and which market segments are over/under supplied.</p>	

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			<p>2.4 PPG contains specific guidance on the needs of the logistics sector given its role in the efficient supply of goods, and therefore economic productivity which is a key part of the UK Industrial Strategy. It goes on to note that strategic logistics facilities need significant amounts of land with access to strategic transport networks and that where a need exists, Councils should collaborate with infrastructure providers and other interests to identify the scale of need. Likewise, Councils need to understand the needs of specialist or new sectors including through clustering of certain industries to support collaboration, innovation, productivity and sustainability.</p> <p>2.5 Overall therefore, the NPPF and PPG require that plan-making authorities must address their economic needs in their local plans, which requires an overriding strategy on how and where those needs are to be met. This is critical to achieving a Plan that is sound in accordance with the tests in the NPPF (para 35). The CBLP contains an Area of Search for Strategic Employment Locations (SELS) south and east of Gatwick, an area currently safeguarded for a second runway for Gatwick. TWG's separate representations on safeguarding (Policy GAT3) note that there is no longer any national aviation policy requiring land to be safeguarded at Gatwick. In this context, CBC could only contemplate safeguarding any land for airport expansion if it could be accommodated having met its urgent and critical need for strategic employment land; otherwise, the long term convenience of safeguarding would have to give way in order to accommodate the more pressing and immediate economic needs of the area and its population.</p>	

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			<p>2.6 In the context of the above policy and guidance, it is considered that the Council's overall approach to identifying future economic needs in the North West Sussex Economic Growth Assessment (EGA) falls short of what is required. The geography of the EGA is limited to North West Sussex, when national policy and guidance and all the regional and sub-regional studies emphasise the need for a wider assessment covering the Crawley/Gatwick sub-area traversing parts of north West Sussex and south east Surrey. Evidence in this representation also points to an under-assessment of future land and floorspace needs that is at variance with the ambitious economic objectives for the Crawley/Gatwick area and with the findings of Savills' economic market analysis undertaken for TWG. This representation sets out the extent of these concerns that need to be addressed if the EGA is to form a sound basis for informing the DCBLP.</p> <p><b>3.0 The need for a joint approach</b></p> <p>3.1 Reference has already been made to the need for a joint approach to the planning of economic growth by the local authorities adjoining the Crawley/Gatwick area within the Gatwick Diamond. Such a cross-boundary approach is enshrined in the Duty to Cooperate under s33 of the Planning and Compulsory Purchase 2004 Act. This approach has been consistently cited in other reports and policy documents:</p> <ul style="list-style-type: none"> <li>• The adopted Core Strategy (2005) contains several references to the need for cross-boundary working and collaboration that could include the identification of strategic employment development opportunities.</li> </ul>	

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			<ul style="list-style-type: none"> <li>• The Council's updated economic evidence base from 2011, included working with adjoining authorities to maximise the opportunities offered by the Gatwick Diamond and LEP areas.</li> <li>• The Gatwick Diamond (GD) local authorities Memorandum of Understanding cites the need for a secure a consistent approach to strategic planning through joint working to ensure policy-making is informed by the views of other local authorities.</li> <li>• The joint Economic Growth Assessment (EGA - 2014) identified noted the significant cross-boundary implications given the high degree of commercial and property market inter-relationship across the three authorities.</li> </ul> <p>3.2 More recently, Planning Practice Guidance (PPG) focuses on identifying future employment needs within a Functional Economic Market Area (FEMA), which will likely straddle local authority boundaries: County Councils and Local Economic Partnerships (LEPs) will play an important role in this regard (PPG - 025 Ref ID: 2a-025-20190220). This is reinforced in the NPPF, which requires Local Planning Authorities (LPAs) to engage with LEPs and the County Councils on strategic matters and maintain a Statement of Common Ground with other LPAs on cross-boundary matters (para 25).</p> <p>3.3 Given the weight of evidence that there is a need for a cross-boundary and collaborative approach to identifying and planning for the strategic economic needs at the heart of the Gatwick Diamond, there is no justification for CBC continuing with a West Sussex-centric approach that has taken no real account of the wider sub-regional area. This is accepted as the wider Crawley/Gatwick area and straddles up to 6 local</p>	

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			<p>authority areas: Crawley Borough; Mid Sussex District, Horsham District, Reigate and Banstead Borough, Tandridge District and Mole Valley District. CBC's approach therefore falls short of the approach required in both the NPPF and PPG and is therefore unlikely to be found sound by an Inspector at Examination.</p> <p>3.4 The evidence suggests that the spatial planning and land use implications of economic growth beyond 2020 may require a more joined-up approach involving collaborative policy-making between the local authorities that cover the heart of the Gatwick Diamond (Crawley/Gatwick). Such an approach could be through a joint Area Action Plan or joint local plan, with joint evidence prepared in the context of regional / sub-regional economic policy from the Coast to Capital LEP and the Gatwick Diamond initiative.</p> <p>3.5 Taking a longer term view, the evidence contained in this representation points to the longer term demand to 2035 and beyond being significant. This includes demand associated with the expansion of Gatwick Airport to c 70 mppa by 2032.</p> <p><b>4.0 Past unmet economic needs</b></p> <p>4.1 Evidence to support strategic employment provision at the sub-regional level has existed for some time<sup>3</sup>. CBC sought to address the need in part through the identification of a Strategic Employment Location (SEL) in the previous Local Plan (2015), but suitable land for that purpose has not been forthcoming given the impact of 'Safeguarded Land' for a possible second runway at Gatwick Airport.</p> <p>4.2 The study by GVA Grimley (2008) was commissioned by the Gatwick Diamond LDF Group of local authorities to consider the spatial implications of the Gatwick Diamond Futures Plan<sup>5</sup> and the future delivery of employment space.</p>	

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			<p>The Study recommended that the authorities work together on delivering more employment land, a Strategic Business Hub and accelerated growth in the key centres, including Crawley. From this point, it appears that the District and Borough councils in northern West Sussex advanced work separately from the councils in Surrey (Reigate &amp; Banstead, Tandridge and Mole Valley).</p> <p>4.3 The three northern West Sussex Councils published a joint Employment Land Review (ELR) in 2010<sup>6</sup> to assess the need for a Strategic Business Hub and suitable locations. The joint ELR concluded that there was a strong qualitative case for a strategic employment site in the area, and proposed spatial options for a site at Crawley, or further south in Mid Sussex or Horsham: subject to addressing infrastructure capacity, the former was considered to be more deliverable. Following this study, a joint Economic Growth Assessment (EGA - 2014)<sup>7</sup> identified the potential in both qualitative and quantitative terms. It went on to advocate a sequential approach to identifying a location: at Crawley, adjacent to Crawley, and locations accessible to Crawley. A subsequent EGA update for Crawley reinforced the case for a strategic employment site within Crawley Borough.</p> <p>4.4 Crawley BC responded by identifying an Area of Search (AoS) for a Strategic Employment Location (SEL) south and east of Gatwick Airport. However, land could not be allocated because of the need to safeguard land for a possible second runway for the airport. The AoS forms part of the adopted CBLP (2015), with site-specifics to be addressed via a review following the Government's decision on runway capacity for the South East of England – a review and a Government</p>	

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			<p>decision that solely supports new runway provision at Heathrow.</p> <p>4.5 The need for a new strategic business location / business park related to Gatwick Airport has therefore long been a part of sub-regional and local policy acknowledged in the Gatwick Diamond Futures Plan (2008) (pages i-ii, 12, 13, 16 and 18). The wider based Coast to Capital SEP (2014) also acknowledged the importance of the Crawley/Horley area by identifying Horsham and Crawley/Gatwick as the heart of the Gatwick Diamond and several other initiatives: the need for clusters of business premises; addressing poor quality industrial estates and stock; addressing the shortage of industrial units, and the need for an ASEAN Business Hub based at Gatwick Airport.</p> <p>4.6 The CBLP evidence base revealed a baseline requirement that justified the one or more SELs. However, while there was a national policy requirement to safeguard land for the second runway, the options south and east of the Airport remained unavailable. Since the CBLP was adopted, the option of a second runway at Gatwick has been rejected and there is no longer a national policy requirement to safeguard land. In the meantime, demand for high quality employment floorspace has continued to grow fuelled by the ongoing growth of Gatwick Airport and from wider regional growth and international economic influences. Both past and current regional economic studies recommend that the optimum location to focus such growth is the Crawley/Gatwick area at the heart of the Gatwick Diamond.</p> <p><b>5.0 Current unmet economic needs</b></p> <p>5.1 CBC has revised its 2014 Economic Growth Assessment (EGA, 2019) for the North West Sussex Functional Economic</p>	



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			<p>Area (FEMA); pursuant to a joint report with Horsham and Mid Sussex District Councils under the Duty to Cooperate (DtC). The report was based on a geography defined by the travel to work area and 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. The EGA report has yet to be released, but its preliminary findings have influenced policies on the economy in the DCBLP. CBC state that it provides a 'robust' evidence base with regard to sectors and locations where employment development is to be promoted or protected in Crawley and maintains that the EGA identifies significant demand for business-led growth, specifically within in the B use classes.</p> <p>5.2 The DCBLP goes on to state that "<i>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</i>". The role of the Manor Royal employment area is acknowledged, but the employment areas in the Borough will be unable to accommodate the scale of additional land identified in the EGA. The DCBLP acknowledges that Crawley/Gatwick is the leading economic driver in the Gatwick Diamond and the economic heart of the Coast to Capital LEP area, but that its potential has been stymied by the safeguarding of land for a second runway at Gatwick in the adopted CBLP. The result of this policy-constraint has been that the 35 hectares on unmet employment land identified in the 2015 EGA has remained unfulfilled. The DCBLP notes that CBC will continue joint working with the</p>	

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			<p>Gatwick Diamond local authorities to accommodate its unmet business needs. However, there is no evidence that CBC has undertaken any joint work with its neighbours across the heart of the Gatwick Diamond to find the land needed.</p> <p>5.3 In relation to meeting Crawley's needs elsewhere, the DCBLP refers to the Horley Business Park (HBP) a proposed allocation of 31 ha under Policy HOR9 of the Reigate &amp; Banstead Borough Council (RBBC) Development Management Plan (DMP, 2018) covering the period to 2027. The allocation is located south of Horley and north east of the airport and is acknowledged by RBBC and CBC as a source of land to meet part of the unmet needs of Crawley. The HBP was not brought forward because of any joint working with RBBC, so is not the product of any collaboration under the Gatwick Diamond initiative. The HBP was identified for mainly office uses (B1a) to largely meet sub-regional economic needs and some needs arising from Reigate &amp; Banstead. The intention of the policy is acknowledged, but HOR9 alone is wholly inadequate to meeting the economic needs of the sub-region to 2035, even based on CBC's and RBBC's very cautious forecasts of demand for business floorspace. Table 5.1 below shows the future floorspace needs of RBBC and the sub-region/Crawley based on the most up-to-date data from both Councils contained in the DCBLP and RBBC's strategic employment site economic assessment by Chilmark Consulting.</p>	

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response															
			<p><b>Table 5.1 - RBBC and sub-regional floorspace requirements and supply</b></p> <table border="1"> <thead> <tr> <th>Area</th> <th>Floorspace requirement to 2035</th> <th>Floorspace supply</th> <th>Surplus / shortfall (floorspace)</th> <th>Surplus / Shortfall (land)</th> </tr> </thead> <tbody> <tr> <td>RBBC</td> <td>46,000 sqm<sup>10</sup></td> <td>48,726 sqm<sup>11</sup></td> <td>+ 2,726 sqm</td> <td>+ 0.68 ha</td> </tr> <tr> <td>Crawley/sub-region</td> <td>240,885 sqm<sup>12</sup></td> <td>72,000 sqm<sup>13</sup></td> <td>- 168,885 sqm</td> <td>- 42.2 ha</td> </tr> </tbody> </table> <p>5.4 The above data shows that the supply of land in RBBC without the HOR9 allocation is only just sufficient to meet locally generated employment land needs. RBBC relies heavily on the intensification and redevelopment of small sites (71%), which are an inherently unpredictable source of supply. The only large opportunity is at Salfords (22,500 sqm). If the smaller sites fail to materialise, RBBC would need to increasingly rely on HOR9 to meet its locally generated employment needs. In summary, there is a clear risk that HOR9 will in part be taken up by locally generated economic demand and provide only limited land for sub-regional needs.</p> <p>5.5 These wider sub-regional/Crawley needs are significant. The requirement of 240,885 sqm in Table 5.1 is taken from Council studies and is an absolute minimum. Against this requirement, the HOR9 site would provide only 72,000 sqm of floorspace, far less than RBBC's estimate of 200,000 sqm. HOR9 was planned to cover the period to 2027, but the longer term and increasing needs to 2035 dictate the need for a significant increase in the provision of employment land, shown in Table 5.1 as being at least 42ha. This represents a base case of need taken from the studies of both Councils.</p>	Area	Floorspace requirement to 2035	Floorspace supply	Surplus / shortfall (floorspace)	Surplus / Shortfall (land)	RBBC	46,000 sqm <sup>10</sup>	48,726 sqm <sup>11</sup>	+ 2,726 sqm	+ 0.68 ha	Crawley/sub-region	240,885 sqm <sup>12</sup>	72,000 sqm <sup>13</sup>	- 168,885 sqm	- 42.2 ha	
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			<p>Paragraphs 6.15-6.20 of this representation set out robust evidence in support of a significantly higher demand and need for strategic employment land in the Crawley/Gatwick/Horley area aligned with sub-regional economic policy. The base case indicates that there is a need for a site on the scale of Gatwick Green; but the evidence presented in this representation on the wider market demand points directly to further land in addition to the Wilky land east of Gatwick.</p> <p>5.6 There is a further reason why HOR9 will not provide for much of Crawley's unmet needs. This arises in relation to Crawley's need for land for industrial and warehousing uses (B1c, B2 and B8) (64% of the overall need) compared with the allocated use of HOR9 for principally office uses (B1a). As a consequence, there is a mismatch between Crawley needs on the one hand and the uses permitted at HOR9 on the other. Policy HOR9 will not therefore be in a position to accommodate 64% of Crawley's unmet needs as RBBC has claimed; this is a further indicator that land east of Gatwick remains critical to meeting the unmet needs of Crawley and the wider sub-region. The evidence points clearly to identifying Gatwick Green as a Strategic Employment Location in the DCBLP.</p> <p>5.7 CBC's EGA 2019 identifies that there is a need for up to 58 ha of employment land to 2035, of which the unmet need is now 45 ha, taking account of the estimated supply of c13ha from the intensification of existing employment uses and the retention of land and buildings in the Main Employment Areas. There is significant uncertainty around the future supply of new floorspace from intensification, and it</p>	

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			<p>is not clear how the retention of land and buildings could provide any net gain in floorspace.</p> <p>5.8 The DCBLP cites the HBP (allocated under Policy HOR9) as having “<i>significant scope to help to accommodate unmet business needs of Crawley</i>”, but this is clearly not the case. As noted in this representation, the potential of the HBP to meet the longer term unmet needs of Crawley to 2035 is limited. The Council is therefore relying to a large extent on a source of land/floorspace supply that would fall significantly short of what is required to meet the long term needs of the Borough / wider sub-region. There is therefore significant risk that the Borough’s economy could under-perform; that the subregion / region could see its major economic driver lose ground relative to other regions, and that the socio-economic needs of the population go unfulfilled.</p> <p>5.9 Even more of a concern is that the pipeline of land to meet short term needs over the next five years in the context of the adopted CBLP is very limited, amounting to only 13.19 ha. This is a reduction from the 23 ha available when the CBLP was adopted in 2015. Crawley therefore has an employment land supply crisis that has been left unresolved since about 2013. The Council has failed to respond to this crisis – it has (1) not undertaken any joint working with its Gatwick Diamond neighbours in Surrey and West Sussex to find a strategic site in the Crawley/Gatwick area that could be brought forward, and (2) not sought detailed evidence from GAL to justify the ongoing safeguarding of land east and south of the airport that could be utilised for strategic employment.</p> <p>5.10 Instead, the Council’s response has been to rely on a range of uncertain and unreliable sources of floorspace</p>	

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			<p>supply and to maintain its Area of Search for Strategic Employment Locations(s). Policy EC1 (Sustainable Economic Growth) outlines this approach, the key elements being:</p> <ul style="list-style-type: none"> <li>• Protect Manor Royal as the key business location for Crawley at the heart of the Gatwick Diamond.</li> <li>• Protect the Main Employment Areas.</li> <li>• Encourage the redevelopment of the Main Employment Areas.</li> <li>• Support minor extensions to Manor Royal.</li> <li>• Provide for 13.2 ha of employment land to meet short term economic needs.</li> <li>• 58 ha of land is needed to secure future economic growth at Crawley.</li> <li>• The majority of land needed will need to be though new strategic employment location(s) (SELs) and these will be identified though a sequential approach based on (1) land within Crawley at the north of the Borough, (2) land at Crawley/Gatwick immediately adjacent to the Borough, and (3) land near to Crawley/Gatwick.</li> <li>• The preferred location for SELs within the Borough are to the south or east of Gatwick Airport – identified as an Area of Search for SELs; land which is proposed to be safeguarded for a second runway at Gatwick. The SELs will only be identified once the position regarding the second runway at Gatwick has been determined.</li> </ul> <p>5.11 The policy contains some elements that are supported, including the need for one or more SELs to meet Crawley’s longer term needs. However, it fails to positively encourage sustainable economic growth; allocate strategic sites to meet anticipated needs; address the infrastructure needs to accompany strategic sites, or to allow flexibility to enable</p>	

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			<p>rapid responses to changes in the economy – these are all essential national policy requirements contained in the NPPF (para 81). The Council's continued intention to maintain the Safeguarded Land for the airport's second runway under Policy GAT2 is a major obstacle to bringing forward a positive policy framework. Evidence on behalf of TWG contained in separate representations to Policy GAT2 sets out in detail why safeguarding land is no longer justified and should be removed from the DCBLP, or otherwise amended to facilitate now essential economic development east of Gatwick. Policy EC1 is therefore considered to be unsound against the tests of soundness in the NPPF (para 35) in that it is not positive, has not been justified, would not be effective in delivering growth in the economy, and is inconsistent with national policy.</p> <p><b>6.0 Sub-regional economic needs to 2035</b></p> <p>6.1 Evidence has been cited to support a robust cross-boundary, collaborative and subregional approach to identifying the future economic infrastructure needs of the area. An assessment of the demand for employment land and floorspace in the wider Crawley/Gatwick area requires a clear understanding of the regional and sub-regional economic and infrastructure policy context. These policies all point directly to the rationale for, and potential of, concentrating a significant level of economic activity in the wider Crawley/Gatwick area, taking advantage of its existing strengths and potential to build on these through sustainable economic growth. This policy cannot be realised without significant provision of integrated economic infrastructure: employment land, community transport, highways, transport interconnections, broadband, education, housing and leisure.</p>	

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			<p>6.2 There are a number of regional and sub-regional studies and policy documents that are all pointing towards developing the economic infrastructure in the Crawley/Gatwick area which are addressed in more detail below.</p> <p><b>Regional policy and infrastructure</b> <b>The Gatwick Diamond Initiative</b></p> <p>6.3 The need for a new strategic business location / international innovation and business park related to Gatwick Airport has long been a part of sub-regional policy including providing a new knowledge-based airport-related business hub offering international business connectivity. The Gatwick Diamond LDF group of local authorities commissioned GVA Grimley (2008)<sup>15</sup> to consider the spatial implications of the Futures Plan and the future delivery of employment space across the sub-region. The Study recommended that the authorities work together on delivering more employment land, and higher level intervention to achieve a Strategic Business Hub and accelerated growth in the key centres, including Crawley. The same councils jointly produced the Local Strategic Statement (LSS)<sup>16</sup>, which was clear <i>“that in the short and medium term the primary focus for new business development will be the areas around Crawley and Gatwick, reflecting their existing strength as a business location and the potential for attracting growth to this location”</i>.</p> <p>6.4 The LSS identified the need for <i>“investment in sustainable transport at the regional hubs, Crawley/Gatwick and Reigate/Redhill”</i> and the need for joint working <i>inter alia “to establish the desirability of and location for a new science/technology park or parks, possibly linked to new or</i></p>	



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			<p><i>improved health or education facilities...an environment and target market which clearly sets it or them apart from existing business locations</i>". This work led to the Memorandum of Understanding (MoU)<sup>17</sup> to promote collaboration on policy, previously referred to in this representation. The Gatwick Diamond Strategic Business Plan (2016)<sup>18</sup> required local authorities to adopt plans that provided for growth to meet housing, office, property and infrastructure needs and to implement the LSS. Joint working between the West Sussex and Surrey members of the Gatwick Diamond under the MoU ceased around 2011, with strategic economic planning thereafter truncated by the County boundary. This, coupled with the failure to bring forward any meaningful strategic employment land focused on Crawley/Gatwick, has placed a major brake on the economic potential of the region and sub-region.</p> <p><b>The Coast to Capital Strategic Economic Plan, 2018</b></p> <p>6.5 The Coast to Capital Strategic Economic Plan (SEP)<sup>19</sup> identifies Gatwick Airport as the driver of, and location for, economic growth given its place at the geographical and economic heart of the region. The Airport is the beating heart of business in the region and <i>"central to our plans to unlock future productivity and prosperity for our area as a whole"</i>. The SEP sets out the spatial implications of its approach, which supports growth of the Airport and that <i>"A stronger industrial base in our area, based around the airport, will spread to the coastal and rural economy"</i> (page 16). Eight economic priorities are identified, including developing business infrastructure and support focused on developing high quality business space so that business can flourish and bring better paid jobs to the area (page 23). Other priorities</p>	

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			<p>relate to creating skills, pioneering innovation, improving transport and mobility, enhancing broadband and raising the profile of the area (page 23). Delivering priorities at Crawley/Gatwick will therefore require land for growth and development linked to private-public investment in infrastructure.</p> <p>6.6 The SEP highlights that the main constraint on future growth is that business infrastructure has failed to keep pace with growing expectations of investors and international businesses. It is notable that no major new business parks have been built in the area since Manor Royal in 1950 (page 70), and goes on to note that the business parks at Horsham, Burgess Hill and Horley will not be sufficient to meet future needs. The SEP notes that area's business park capacity is therefore significantly behind many other parts of the South East, further compounded by the loss of floorspace to residential uses (12% in Crawley since 2013).</p> <p><b>Coast to Capital Local Industrial Strategy</b></p> <p>6.7 The Coast to Capital LEP is preparing the Local Industrial Strategy (LIS). Early work on specific areas has identified two emerging priorities, both being advanced by Hatch Regeneris:</p> <ol style="list-style-type: none"> <li>1. The need for a costed plan for infrastructure investment to support the growth of the towns and sustainable employment and commercial opportunities around Gatwick. This includes the need for joint planning of infrastructure including for sustainable transport needs and investments.</li> <li>2. More work on the supply and demand of business infrastructure, followed by a meeting with Councils and property agents to quantify supply and demand. The Gatwick</li> </ol>	

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			<p>area property demand study by Savills<sup>20</sup> is cited as a source of evidence for this work.</p> <p>6.8 The more detailed work is aiming to identify the level of need / demand for major economic infrastructure around Crawley/Gatwick consistent with the aims of the SEP. It is likely that the LIS work will result in recommendations being made on the scale and nature of the strategic land and investment in economic infrastructure needed in the Crawley/Gatwick area and a costed plan for its implementation. Under the NPPF, planning policies should have regard to LISs and other local policies for economic development and regeneration (para 81(a)).</p> <p><b>West Sussex Economic Growth Plan (May 2018)</b></p> <p>6.9 The West Sussex Economic Growth Plan (EGP)<sup>21</sup> sets out the County Council's priorities in driving economic growth to support a successful, prosperous place. The EGP was drawn up in partnership with the District and Borough Councils, the Coast to Capital LEP, the National Park Authority and other education and business interests. The EGP therefore represents the county-wide plan to bring forward the key strategy and priorities of LEP's Strategic Economic Plan. The EGP sets out a number of key issues to be addressed in West Sussex, including that the economy underperforms against the strongest economies in the South East; the County is 'punching below its weight'; Crawley is the best performing area, but still behind East Surrey and Berkshire in terms of GVA per job filled; the Crawley area has a lower proportion of employment in higher value and knowledge-based sectors than these higher performing areas; growth in the knowledge sector has stalled across the County. Improving productivity is therefore a key challenge.</p>	

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			<p>6.10 In terms of existing employment space within the sub-regional area, the key characteristic are that demand is outpacing supply so driving up rental levels; demand around Gatwick is causing a trade-off between demand for warehousing space and space for knowledge-based and professional occupiers, and employment to residential PD rights have reduced supply further. The need to improve the sustainable transport infrastructure, particularly around Gatwick, is acknowledged. The implications of these issues includes unlocking strategic employment locations. The EGP therefore identifies five priority themes, the second of which is to maximise the opportunities from Gatwick by creating and supporting higher value employment in a wide zone of opportunity around the Airport. In terms of actions, this includes:</p> <ul style="list-style-type: none"> <li>• Developing a strong business proposition in a wide zone of opportunity around Gatwick.</li> <li>• Unlock and enable space for growing businesses around Gatwick.</li> <li>• Ensure West Sussex residents benefit from opportunities arising in and around Gatwick.</li> <li>• Secure infrastructure investment to enable business and productivity growth in the north east of the County.</li> </ul> <p>6.11 The delivery framework in the EGP includes a high-level and annual action plans aligned with an annual budget plan to ensure partnership working. The implications for CBC are clear, it must now address its long-standing unmet economic needs and plan positively for these through the release of land at Gatwick Green for strategic mixed-use employment.</p>	

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			<p><b>Infrastructure studies by GAL and Transport for the South East (TfSE)</b></p> <p>6.12 In addition to the weight of regional and sub-regional support for major economic infrastructure at Crawley/Gatwick, studies by GAL and TfSE have identified the need for major improvements to infrastructure in the area to support the growth of Gatwick Airport to optimise its existing runway and support the South East and UK economies. The GAL report on the Airport's contribution through trade and investment<sup>22</sup> noted the importance of the Airport in facilitating international trade and investment and acknowledged that (1) clusters of high-value industries have coalesced within the Gatwick Diamond area including sectors that depend upon cargo and passenger services, and (2) that the SEP 2014 describes the Airport as central to its economic plan with the potential to act as the catalyst to a cluster of economic activity in the Diamond. The SEP 2018 retains the same broad objectives with regard to the Crawley/Gatwick area.</p> <p>6.13 The Gatwick connectivity study<sup>23</sup> identifies a range of major improvements to the transport network in the Gatwick area to serve the ongoing expansion of the Airport. It is evident that many of these improvements could also serve wider economic growth from major employment development, requiring investment by GAL, Network Rail (NR) and Highways England (HE). The improvements include <i>inter alia</i> upgrading the capacity of the Brighton Main Line (part of NR's capital programme<sup>24</sup>), the M23 Smart Motorway (junctions 8 - 10 – under construction) and the Crawley Western Relief Road (proposed policy in emerging Local Plans), all of which are at various stages of implementation.</p>	

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			<p>Further improvements are identified. These form a baseline of improved transport infrastructure, on which further improvements could be built to serve significant new economic provision in the Crawley/Gatwick area. Some of these improvements are indicated in the Gatwick Airport Master Plan 2019 related to the Airport's proposed Development Consent Order (DCO) to expand the Airport to c 70 mppa by 2032.</p> <p>6.14 The TfSE economic connectivity study<sup>25</sup> aims to identify the role of strategic transport in supporting the South East economy and the case for further investment. The study focuses on economic hubs, industrial clusters, international gateways and regional growth centres. The three cornerstones to achieving economic growth are developing international gateways; building resilience to Brexit, and achieving housing and employment growth. In this context, international gateways are seen as economic hubs in their own right. When seen through the prism of the long-standing objectives of the Gatwick Diamond, the SEP 2018 and the Airport's infrastructure studies, the most likely outcome of the TfSE work will be a need for yet further transport investment in the Crawley/Gatwick area and related highway and rail corridors. These regional sustainable transport objectives are reflected in TWG's separate representation on the sustainable transport and infrastructure policies of the DCBLP, which advocate a more robust and positive policy response aligned with the major economic growth requirements of the Borough / sub-region.</p> <p><b>Gatwick Economic Development Area Market Analysis</b></p> <p>6.15 In 2018, TWG commissioned Savills to undertake a comprehensive review of market demand<sup>26</sup> for different</p>	

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			<p>employment classes within property market areas centred on Crawley/Gatwick. The study focused on the potential employment land demand that could be attracted to a location adjacent to Gatwick Airport in the form of an 'Airport City' concept such as has been developed at a number of airports across Europe (Schiphol, Zurich, Frankfurt, Manchester) and globally (Atlanta, Denver). The report assumed that the strategic location for the 'Airport City' was Gatwick Green on land controlled by TWG. Demand was assessed based on a Property Market Area (PMA) approach looking ahead to 2050 and assuming growth at Gatwick Airport similar to that contained in the 2019 Airport Master Plan. PMAs were defined for a number of employment classes: offices, industrial / distribution, hotels, retail &amp; leisure, further/higher education, and the implications of planned infrastructure investment.</p> <p>6.16 The conclusions in relation to property demand were:</p> <ul style="list-style-type: none"> <li>• <b>Offices</b> – The amount of additional floorspace required to 2050 is between 1.1 million and 3.2 million sq ft, or about 34,000 – 98,000 sq ft per annum. Given Gatwick Airport's central location within the office PMA, a significant proportion of office demand would be expected to locate close to the Airport at Gatwick Green.</li> <li>• <b>Industrial / distribution</b> – The amount of additional floorspace required to 2050 in the airport-related PMA is between 118,000 and 254,000 sq ft per annum. the Airport would be expected to be a significant driver of growth there given the proximity of Gatwick Green to the M23 and the Airport.</li> <li>• <b>Hotels</b> – Demand for additional hotels at Gatwick Airport is likely given the forecast growth in air passenger movements.</li> </ul>	

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			<p>Assuming growth in passenger numbers based on use of the standby runway, there is scope for an additional 2,341 additional hotel bedrooms, equating to about 9 hotels based on c 260 bedrooms per hotel. The market would support integral conference facilities as part of the offer. A significant proportion of this demand would gravitate towards the Airport in on or off-airport locations including Gatwick Green.</p> <ul style="list-style-type: none"> <li>• <b>Retail &amp; leisure</b> – The population and retail expenditure per person of Crawley is expected to continue to grow, by 1.01% pa and 2.7% pa respectively. These increases would result in demand for an additional 178,000 sq ft of retail floorspace by 2022. With c 13,000 sq ft of retail floorspace in planning in the town centre, unmet need would be only 48,000 sq ft – this could be accommodated in highly accessible out-of-town locations or through more regeneration opportunities in the town centre. On balance, it is expected that the primary role of retail / leisure around Gatwick Airport would be as ancillary space to support additional commercial and residential uses: some retail and leisure uses are an essential part of any new employment-led urban area, so a proportion of the unmet need could fulfil this role.</li> <li>• <b>Higher &amp; further education</b> – Unlike commercial and residential uses, HE / FE supply and demand factors do not typically align with a defined PMA. Investment in these facilities is more opportunistic based on clear locational preferences and wider trends concerning Government funding, visa requirements for attracting international students and demographic trends. Given these characteristics it is not possible to estimate with any level of accuracy what future FE / HE demand could be at Gatwick Airport. There are three possible scenarios (1) demand for further office development generates potential for educational</li> </ul>	



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			<p>premises to take floorspace within new office buildings, (2) a regional, national or international college or university invests in a purpose-built campus, and (3) a conglomeration of educational establishments work together to develop a 'multiversity' concept which could include a hybrid mixture of Further and Higher Education.</p> <ul style="list-style-type: none"> <li>• <b>Residential</b> – The HMA surrounding Gatwick Airport is in an area with low (stretched) affordability, and high demand for housing with fairly low levels of new housing delivery, falling significantly short of the numbers required to meet high demand. There will be need for significant new housing in the Crawley/Gatwick area based on demographic forecasts and planned Airport growth, but land at Gatwick Green will have very limited potential given the impact of the Airport Public Safety Zone and the noise contours.</li> <li>• <b>Infrastructure</b> – The study sets out the currently planned transport infrastructure improvements and those identified in the Gatwick Growth Board Connectivity Study<sup>27</sup> related to maximum growth under a single runway. Other improvements would likely be needed to support an Airport City concept at Gatwick Green, such as are being investigated by TfSE through its Economic Connectivity Review.</li> </ul> <p>6.17 Assuming airport growth based on one runway, this level of demand, which could be largely focused at Crawley/Gatwick, could support either a 'Demand Based' or a 'High Growth' concept, but with the latter relying on investor / occupier demand from regional, national and international markets for offices and hotels. This is not unusual for a development of this scale, especially given the relatively</p>	

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			<p>small areas covered by the Airport PMAs for office, hotel and industrial / distribution.</p> <p>6.18 The shortfall in Crawley's employment land supply has increased from 35 ha in the adopted CBLP to c 45 ha in the DCBLP – this is considered to be a baseline shortfall given the limitations of the Council's EGA noted in this representation. Collectively, the studies suggest a significant need for strategic employment land near to Crawley/Gatwick – of the land within the Area of Search (AoS), only the land at Gatwick Green has the high level of accessibility and potential for quality connectivity that a highly sustainable employment-led mixed-use urban quarter requires.</p> <p>6.19 In terms of supply, Manor Royal is somewhat constrained in growing its footprint and has some qualitative drawbacks; the scope to expand Manor Royal is also limited. A recent study by Styles Harold Williams (SHW)<sup>28</sup> shows that whilst there is estimated to be potential for up to 4.7M sq ft of additional business floorspace in the Gatwick Diamond area, only one site is located at Crawley/Gatwick, being the Horley Business Park between Horley and Gatwick. However, this site is not 70 ha as stated in the SHW report, but a proposed allocation of only 31 ha and a capacity of only c 72,000 sq m (c 775,008 sq ft), so not strategic. The available land supply to meet the unmet needs associated with Crawley/Gatwick is limited in qualitative and quantitative terms, so there remains a need for one or more Strategic Employment Locations (SELs) within the Council's AoS: Gatwick Green remains the most sustainable and high-profile marketfacing option.</p> <p>6.20 As noted in separate representations on behalf of TWG on DCBLP Policy GAT2, there is no case for continuing to</p>	

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			<p>safeguard land at Gatwick for a second runway, so land is available east of the Airport to accommodate strategic employment and related uses.</p> <p><b>7.0 Key findings and the policy response</b></p> <p>7.1 The unmet economic needs of Crawley and its wider sub-region are now of critical moment. Based on CBC's evidence, the unmet needs since around 2012 have been c 35 ha (86.5 acres), and over the past six years have increased to at least 45 ha (111 acres), but there has been no policy response whilst land remains safeguarded for a second runway at Gatwick. As stated in this representation, there is no longer any national aviation policy requiring land to be safeguarded at Gatwick, so in terms of the Council's priorities, either the safeguarding should be dropped, or adjusted so as to accommodate Crawley's critical economic needs. The latter solution represents a third option, which has not been contemplated by CBC, but merits further assessment.</p> <p>7.2 At a sub-regional level, the focus from all past and the current studies is that the Gatwick/Crawley area at the 'Heart of the Gatwick Diamond' represents a major strength in the regional economy, but one that is underperforming and underutilised in terms of its potential to raise the economic value of the area to a level similar to that in East Surrey or Berkshire. The regional and sub-regional/County studies all single out the Crawley/Gatwick area for major growth and strategic mixed-use employment development and transport infrastructure investment. A separate representation by TWG on the sustainable transport policies in the DCBLP sets out the strategic and sustainable transport needs and opportunities in the Crawley/Gatwick area and how these</p>	

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			<p>require a transport strategy to support growth; such would be supported by the TfSE connectivity study.</p> <p><b>8.0 Gatwick Green / Airport City</b></p> <p>8.1 TWG has undertaken an economic development area market analysis focusing on the scale and nature of the demand potential at and around Gatwick Airport. The demand profile is summarised in this representation, but includes office uses, industrial and distribution uses, retail and leisure, higher and further education, some residential and major infrastructure. The core of this opportunity is represented by Gatwick Green, a mixed-use employment opportunity on about 59 ha (146 acres) in a highly sustainable location, but with the potential for expansion within Crawley Borough and neighbouring Reigate &amp; Banstead Borough north of the M23 spur road.</p> <p>8.2 Part of the wider opportunity could comprise a proposed strategic employment allocation south of Horley and west of Balcombe Road in Reigate and Banstead Council's area under Policy HOR9 of the Council's soon to be adopted Development Management Plan (DMP). Whilst the HOR9 allocation was intended as 210,000 sqm of strategic employment, the Borough Council has stated in its evidence to the DMP EiP that more of it will be required to meet local unmet needs arising from the Council's area. In this regard – and taking account of the site's reduced potential as a result of the flood zones and Gatwick Area Open Setting buffer – the site does not represent the solution to the sub-regional economic infrastructure deficit in the Gatwick area, but will play a small part towards it. Gatwick Green and the wider opportunity are shown on the plan at <b>Appendix 1</b>.</p>	

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			<p>8.3 Gatwick Green represents a strategic opportunity to bring forward a highly sustainable mixed-use employment area that benefits from accessibility to several national transport networks and is wholly aligned with economic and industrial policy for the regional and sub-region, and Local Plan policy for the location of strategic employment land and economic needs. As part of the wider opportunity around Gatwick/Crawley/Horley, it offers a unique opportunity to deliver significant benefits to all three of the key components of sustainability:</p> <p><b>Economic</b> – Significant economic benefits including for example up to £1M of Gross Value Added (GVA) to the sub-regional economy; local expenditure of up to £3M; CIL contributions of up to £10M, and business rates income of up to £16M. These and other benefits will ensure north east west Sussex and the Gatwick/Crawley/Horley area can be elevated in terms of its economic and employment profile to form a regional national economic hub of international significance at a major global air transport gateway.</p> <p><b>Social</b> – Significant qualitative and quantitative social benefits including for example a significant increase in jobs; the diversification of local job opportunities; an increase in higher-value / professional/managerial jobs to increase opportunities for promotion, help retain employees and reduce current levels of out-commuting; increased apprenticeships jointly aligned with local colleges; redress long term unemployment; provide enhanced job security through a stronger economy; enhance average earnings to help reduce deprivation and child poverty, and strengthen links with further and tertiary education institutions in the region to help raise skills levels.</p>	

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			<p><b>Environmental</b> – Significant environmental benefits including for example the social value of reductions in CO2 emissions from zero carbon energy and transport solutions; the incorporation of green infrastructure into the masterplan with added habitat value through enhanced connectivity and habitat enrichment; habitat creation designed into the development; a net gain in biodiversity through a package of measures including biodiversity offsetting; opportunities for environmental research and education, and improved urban air quality from clean transport solutions (refer to separate representation by TWG the sustainable transport policies of the DCBLP).</p> <p>8.4 Gatwick Green and the wider Airport City opportunity represent a unique and unrivalled opportunity because of:</p> <ul style="list-style-type: none"> <li>• Deliver a <b>socially-sustainable mixed-use employment location</b> that facilitates knowledge-transfer and a healthier working environment.</li> <li>• Deliver <b>higher-value employment opportunities</b> to redress out-commuting and offer chances for career progression in an area overly dependent on skilled and semi-skilled work at Gatwick.</li> <li>• Diversify the economy around Gatwick by <b>transforming and rebalancing</b> the local and sub-regional economy.</li> <li>• Deliver <b>smart growth and additionality</b>.</li> <li>• Provide <b>enhanced apprenticeship and training</b> opportunities aligned with the objectives of local colleges.</li> <li>• <b>Adjacency</b> to Gatwick Airport, which is critical to attracting sectors that need near-airport locations.</li> <li>• <b>High visibility</b> from the M23 and access to rail infrastructure.</li> <li>• <b>Strong</b> residential and commercial floorspace <b>demand</b>.</li> </ul>	

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			<ul style="list-style-type: none"> <li>• Ability to attract <b>regional and national organisations</b> across a range of sectors.</li> <li>• The <b>absence of any alternative opportunity</b> with the same connectivity and high profile.</li> <li>• Meet the current <b>unmet economic needs and future demand profile</b>.</li> <li>• Inject significant additional <b>long term expenditure</b> into the local economy.</li> <li>• Add a <b>significant amount to the regional GVA</b> and local authority revenue.</li> <li>• Redress the <b>shortage of high-grade employment floorspace</b> in an optimum location.</li> <li>• Deliver <b>significant sustainable transport infrastructure</b> to enhance accessibility, reduce emissions and improve air quality in an area of intense economic activity.</li> <li>• <b>Complementarity</b> with Gatwick Airport's growth plans in its Master Plan 2019, including the DCO for the use of the standby runway.</li> <li>• <b>Potential</b> to accommodate a third option that allowed the Airport to retain a revised safeguarding for a further runway, whilst still enabling critical economic development east of the Airport (the third option is outlined in more detail in TWG's representation on policy GAT2). This benefit only arises if continued safeguarding is justified (which is also addressed in TWG's GAT2 representations).</li> </ul> <p>8.5 It is of significance that other European airports are developing complimentary economic hubs or zones in their hinterland – e.g. Manchester, Luton, Birmingham, Frankfurt, Schiphol, Zurich and Munich. In terms of deliverability, the Gatwick Green site is free of any statutory national environmental designations and benefits from a strategic and</p>	

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			<p>highly sustainable location, with the ability to connect with national transport networks (airport, mainline rail and SRN) and be served by and expand local sustainable transport networks (Fastway, local bus services, cycle ways and footpaths).</p> <p>8.6 The consequence of not meeting the short, medium and long term economic and social needs of the Borough's current and future population and instead safeguarding land for an unsupported second runway would be significant – these are outlined in Table 8.1 below <i>*see original rep*</i>.</p> <p><b>9.0 Policy EC1 - Soundness</b></p> <p>9.1 In summary, it is concluded that the DCBLP:</p> <ol style="list-style-type: none"> <li>1. Has not adopted a proactive and positive approach to planning for economic growth as required by the NPPF.</li> <li>2. Has not taken full account of the regional and sub-regional economic and infrastructure policies and studies that point directly to the benefits of major economic infrastructure at Crawley/Gatwick.</li> <li>3. Is based on a FEMA in the Council's EGA that is too narrowly defined and therefore fails to reflect long-standing regional and sub-regional aims for a cross-boundary approach involving all the local authorities at the heart of the Gatwick Diamond.</li> <li>4. Fails to adopt a cross-boundary, collaborative and joint approach to planning for sub-regional economic requirements, consistent with national policy and regional strategy.</li> <li>5. Has under-assessed the employment land needs of the Crawley/Gatwick area based on a PMA approach, which offers a more realistic assessment of demand in line with PPG.</li> </ol>	

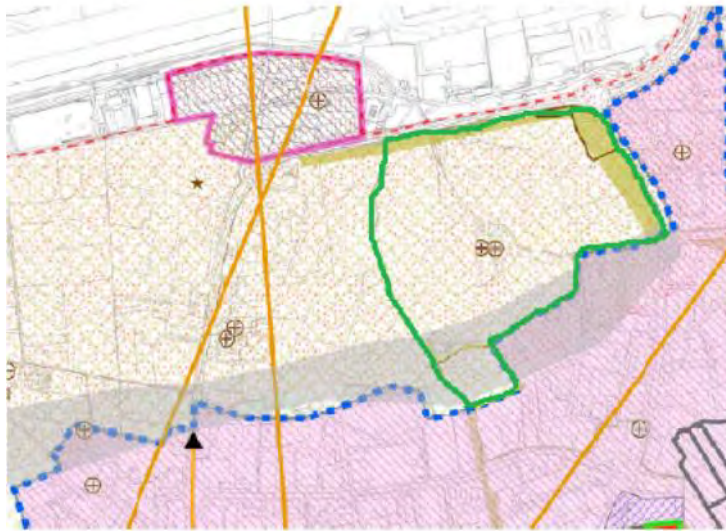


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			<p>6. Continues to include the option of safeguarding land at Gatwick Airport for a second runway, when national aviation / airport policy no longer requires it.</p> <p>7. Overestimates the ability of the Horley Business Park to meet the current and future unmet economic needs of the Borough.</p> <p>8. Fails to allocate land for strategic employment to meet even its identified shortfall of c 45 ha, or that identified in the Savills study, including allowing for flexibility.</p> <p>9. Does not provide a strategy that could address the qualitative shortcomings of the current employment floorspace and limited planned provision.</p> <p>9.2 It is therefore considered that the DCBLP is not sound in relation to its policies on employment and the economy because (1) it does not provide sufficient land to meet the objectively assessed demand for B class uses, so was therefore not positively prepared, (2) it contains a strategy on employment and the economy that is not the most appropriate and is not justified by the available evidence, (3) the strategy on employment and the economy is not the most effective as it would not deliver sufficient strategic land to meet the needs of the Gatwick Diamond sub-region, and (4) it is not consistent with national policy, which requires that LPAs proactively encourage sustainable economic growth and identify strategic sites for inward investment (NPPF, paras 80-82).</p> <p>9.3 In relation to employment and the economy, the DCBLP falls short of what is considered necessary to meet the quantitative and qualitative needs of Crawley and the sub-regional economy. It is therefore considered that the DCBLP is not sound. To address this, additional land is required to be</p>	

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			<p>allocated in the DCBLP to accommodate future economic and business infrastructure, especially land for high-quality employment uses. A Strategic Employment Location (SEL) located with the Council's Area of Search identified in Policy EC1 of the adopted CBLP has been put forward: this comprises the Gatwick Green site between Balcombe Road and the M23, a site controlled by TWG and deliverable within the plan period.</p> <p>9.4 In the absence of any robust evidence to safeguard land for a second runway, CBC should not continue to safeguard land indefinitely and instead should prioritise meeting its immediate economic and employment needs over the Plan period. There is, however, a third option that involves a reduced safeguarded land area so as to free up land east of Balcombe Road for essential economic development. This option would need to be tested by CBC based on evidence from GAL and against the NPPF tests and though the SEA.</p> <p>9.5 On the basis of the evidence in this representation and separate representations by TWG on safeguarding (Policy GAT2), sustainable transport (Policy ST1) and the Employment Land Trajectory, <b>the DCBLP should allocate the land at Gatwick Green for strategic employment</b> within use classes B1, B2, B8 and C1, including ancillary uses within use classes A1 - A4 and D1.</p>	
REP181/696	Tim North & Associates on behalf of Holiday Extras	Policy EC4	<p>2. Policy EC4 Visitor Accommodation</p> <p>It is noted that Policy EC4 found under the title "<i>Visitor Accommodation</i>" includes a provision whereby parking is expected to be kept solely for the use of staff and guests of the development, and is not to be block parked or used for any other purpose, including off-airport car parking This reflects a different approach from that previously taken by</p>	The approach of this policy (now EC6) is intended for consistency with Policy GAT3 (now GAT2) which ensures that all new airport parking is provided on-airport as the most sustainable location.

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			<p>your Authority in which it was held that off-airport car parking was considered to be ordinarily incidental or ancillary to the use of an hotel/guest house. As you will know, your Council's approach on this issue was not accepted by those advising Holiday Extras Ltd at the Lowfield Heath public inquiry.</p> <p>However, what is required as far as any reasonable alternative relating to a Sustainability Appraisal of the same policy, is consideration of its impact, given that car parking at hotels/guest houses will in all likelihood in the future be restricted by conditions, having an impact on the viability of the particular tourism establishment. Furthermore, consideration ought to be given to those disadvantages relating to the movement of customers' cars from the particular hotel/guest house to an alternative off-airport car parking location, whether lawful or not, and the extent to which this will have an impact on the future kiss-and-fly mode to London Gatwick Airport.</p>	<p>The approach is not inconsistent with that applied at the public inquiry. Whether or not the council deems it appropriate to address off-airport parking at existing hotels is not in itself reason to allow further airport-related parking in off-airport locations, and it is right that Policy EC6 includes the appropriate text for consistency with Policy GAT2.</p> <p>Alternatives to Policy EC4 (now EC6) have been assessed through the SA.</p>
REP181/697	Tim North & Associates on behalf of Holiday Extras	Policy EC12	<p>3. Policy EC12 Rural Economy</p> <p>Policy EC12 is concerned with the "<i>Rural Economy</i>", and as with Policies LC1 and LC5, its provisions do not sit comfortably with the aim that the land north of Manor Royal is a preferred location for future employment development, or alternatively for a wide-spaced runway associated with London Gatwick Airport. The objectives of these two separate sets of policies are diametrically opposed, when considering the preferred location for strategic employment opportunities, and in particular the central thrust in supporting economic growth, creating jobs and leading to prosperity.</p>	<p>Policy SD3 of the Local Plan identifies the land north of Manor Royal for the preparation of the North Crawley Area Action Plan. This will assess the potential future needs of the airport alongside other development and infrastructure needs, as well as considering the natural and heritage assets and landscape which needs protecting. Should work on the AAP establish that a strategic employment location would be appropriate in this location, the AAP will designate an amended Built-Up Area Boundary. Policy EC12 clarifies that any development coming forward in this area prior to the adoption of the AAP must meet the</p>

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				criteria of Policy SD3, and be respectful of the current countryside setting.
REP184/720	Sussex Wildlife Trust	Policy EC12	<p>Section 9 – Economic Growth Policy EC12: Rural Economy We feel that the policy would benefit from the addition of a further bullet point in order to comply with paragraphs 170 and 174 of the NPPF and therefore make the following recommendation: 'Developments proposals that would result in the loss of connectivity or function of the green infrastructure network and or sites of biodiversity value will be avoided.'</p>	Agree that development proposals should avoid negative impacts on the green infrastructure network and sites of biodiversity value, and must comply with all relevant policies in the Local Plan, including those issues covered in the Green Infrastructure and Biodiversity chapter.
REP185/735	Carter Jonas on behalf of Homes England		<p><b>Site Specific Allocation – extension of Manor Royal Employment Areas</b> Manor Royal is the subject of a specific allocation in the Plan and a number of policies relate to this (Policies EC1, EC2, EC9 and EC10). Homes England proposes that this designation should be extended to include the land at Rowley Farm (hereafter referred to as “the Site”) which extends to approximately 52 hectares (ha) and is located immediately to the south of Gatwick Airport and abuts the Manor Royal employment area to the east and south. The extent of the Site is shown on the attached plan (CJ/1) which is an extract from the Proposals Map and on which the Site is edged in green.  The Site is in an agricultural use. There are a number of trees / areas of hedgerow present and two established woodland areas, one in the northeast corner and Rowley Wood in the southwest. Both of these areas are designated as Ancient Woodland with the latter also a Site of Nature Conservation Importance.</p>	<p>Support for the reduction of the extent of safeguarding is noted. The council does not consider the government’s draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place. Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the</p>

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			<p>The Site contains two listed buildings, namely Rowley Farmhouse (Grade II*) and Crown Post Barn (Grade II). All land with the exception of the immediate areas adjacent to Crawter's Brook is within Flood Zone 1. The Site can be accessed via either London Road to the north or James Watt Way to the south and there is potential to access the site from Gatwick Road.</p> <p>The relationship of the Site to Manor Royal (coloured pink) is shown on the extract from the Proposals Map and this clearly shows why it is a logical extension to the existing employment area:</p> 	<p>airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for economic development within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.</p>

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			<p>The Site's allocation for high quality employment floor space would support and grow the Gatwick Diamond and contribute to its future success. The importance of the Crawley/Gatwick area to the economic development strategy is acknowledged in the CBCLPR where it states that it <i>"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 <b>future economic development</b>".</i> (Our emphasis).</p> <p>The Site would also strengthen the strategic importance of The Coast to Capital LEP and the Gatwick 360* Strategic Economic Plan to deliver eight economic priorities, one of which seeks to develop business infrastructure and support. There is already a known demand for new, high-quality business space and the Site would create a logical extension to Manor Royal, providing the ideal opportunity to encourage further economic growth building on existing infrastructure allowing the cluster of economic activity to grow.</p> <p>The Site was previously considered for development as part of the preparation of the adopted Crawley Local Plan, but it was discounted because of <i>"safeguarding for the possible development of an additional runway at Gatwick Airport"</i>.</p> <p>Under Homes England's response to Policy GAT2, in light of GAL having confirmed (29th August 2019) the process is now underway for the submission of a development consent order (DCO) seeking permission to bring its northern runway alongside the main runway by the mid-2020s, we consider the extent of land reserved is excessive because the use of the emergency runway will provide for the airport's growth.</p>	

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			<p>Homes England therefore suggests that if Gatwick Airport requires land to be safeguarded even after the emergency runway is brought into use, subsequently the amount of land required to be safeguarded should be less.</p> <p>Notwithstanding the possibility of a need being established for continued safeguarding for the expansion of Gatwick Airport, Homes England confirms that the Site is available for development in the short term. As this Site satisfies all of the criteria in Policy LC5 which deals with B Use Class development, Homes England consider that all or part of the Site should be allocated for the expansion of Manor Royal.</p> <p>The case for the Site's development for employment use is compelling. It would be able to take advantage of hard and soft infrastructure already in place which include nearby public transport links available at Gatwick Airport train station, Crawley train station and Three Bridges train station and the 'soft' infrastructure that has been developed through the success of Manor Royal. The Site could also be developed in a phased manner alongside the delivery of the CWRR (should the most eastern section be required) and proactively support the priority of the Council and that set out within the Strategic Economic Plan which seeks to build on the success of the existing employment area of Manor Royal.</p>	
REP190/791 (repeated below in Gatwick Airport)	Barton Willmore on behalf of Legal & General Capital		<p>Thank you for the opportunity to comment on the early draft of the emerging local plan review ('the Draft Plan'). We are instructed by Legal &amp; General Capital ('L&amp;G').</p> <p>L&amp;G is committed to unlocking investment opportunities and supporting economic growth. It aims to invest in economically and socially useful assets from conception to delivery and for the long term, focusing on direct investments in key sectors</p>	The site is outside the Local Plan area, within Mole Valley. MVDC has advised it is unable to accommodate Crawley's unmet employment needs due to significant physical, including flooding, and policy constraints on development in the south eastern part of Mole Valley, adjacent to Crawley. MVDC has also

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			<p>including housing, employment, infrastructure and SME finance.</p> <p>As part of its strategic investments, L&amp;G owns land adjacent to key transport infrastructure such as airports. This includes land within the southern part of Mole Valley District adjacent to Gatwick Airport.</p> <p>L&amp;G controls some 155 ha of land immediately to the north of Gatwick Airport ('the Site'). Although the Site falls within Mole Valley District, it lies immediately adjacent to the Borough boundary and the Airport. Please find enclosed a site location plan and also a plan showing the broad location on the key diagram at page 15 of the consultation Draft Plan.</p> <p>The Site is being promoted to provide a range of employment uses to provide much needed additional commercial accommodation to meet the needs arising from the continued success of the Airport and the economic activity that it generates. Crawley is a 'land locked' borough with limited if any opportunity for extending development beyond the current confines of the urban area, certainly whilst the airport safeguarding is retained. Whilst the Site lies outside of the Borough boundary, it is widely recognised that Crawley is reliant on provision elsewhere to meet its identified needs. The Site can play an important role in meeting those needs and also providing additional space for airport related activities.</p> <p>The Draft Plan correctly identifies the important role of the Airport in driving and supporting economic activity in Crawley and the wider Gatwick Diamond. It also identifies the challenges set by the population profile of the borough and the challenges in terms of skills.</p>	<p>highlighted the weak road and public transport links from Mole Valley into Crawley.</p> <p>The Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for economic development with the AAP area will be assessed and identified as part of the AAP.</p>



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			<p>Gatwick Airport Limited ('GAL') has now published its final Master Plan 20191. The Master Plan signals an intention to seek permission, through a Development Consent Order ('DCO'), to expand the capacity of the Airport by utilising the existing stand-by runway. This will generate significant economic benefits which must be appropriately addressed and planned for through the DCO process but also through the relevant development plans.</p> <p><b>Duty to Co-operate and Green Belt</b></p> <p>We welcome the positive response in the Draft Plan to the opportunity presented by the Airport and commitment to continue to work with adjoining districts and boroughs, together with the LEP and other bodies, albeit the Draft Plan is silent in large part in relation to Mole Valley. This, we presume, is a function of the Green Belt status of much of the land within Mole Valley that lies within proximity of the Airport rather than the lack of desire on behalf of either authority to positively engage. However, it is our view that airport expansion of the scale proposed must be positively planned for by all authorities in proximity. Whilst the preparation of the Mole Valley Local Plan has proved to be protracted and subject to a further delay, the emerging local plan will need to address the effect of expansion at Gatwick and be informed by positive engagement with Crawley and other neighbouring authorities. This will manifest in the need for additional land to meet that commercial demand, over and above that identified in the Draft Plan, which already identifies a significant shortfall.</p> <p>The need to provide for additional land to meet the commercial needs of the Airport and the economic activity that its generates, in a sustainable manner that by definition</p>	

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			<p>does not result in extended travel times (with the attendant impact upon commercial attractiveness as well as journey times), would constitute an exceptional circumstance at the local plan review stage.</p> <p>The opportunity presented by land immediately to the north of the Airport in Mole Valley should therefore be included in any 'search' beyond the Borough's boundaries.</p>	
REP190/793	Barton Willmore on behalf of Legal & General Capital		<p><b>Economic Need Arising</b></p> <p>The Draft Plan correctly identifies the need to look beyond the Borough boundaries to meet the need for business space and cites the Horley Business Park. Further land is and will be required. Draft Strategic Policy EC1 identifies a hierarchy of preference in the search for additional land. Land to the north of the borough (EC1(a)) is constrained by airport safeguarding and in the absence of any direction to the contrary, should be assumed to remain for the plan period. The Council is therefore reliant upon "Land at Crawley/Gatwick, in the areas immediately adjoining the borough" (EC1(b)) and "Land near Crawley/Gatwick" (EC1(c)). In reality, both are required.</p> <p>We note that an Economic Growth Assessment ('EGA') has informed the policy response and that it is undergoing review (see para 9.6). Such review should address the now adopted Airport Master Plan and the economic impacts arising. We also note that the EGA relates to the 'Northern West Sussex Functional Area' and would not appear to include Reigate and Banstead, Tandridge or Mole Valley.</p> <p>L&amp;G will continue to positively engage with Mole Valley, Crawley borough and other authorities as well as GAL.</p>	<p>The Local Plan is based on the constrained, past trends scenario of 33ha need set out in the EGA which means there is currently an unmet need of 21ha. Ongoing liaison is taking place with neighbouring councils to determine how much and where this can appropriately be located. The EGA confirms that the North West Sussex FEMA is the same as was considered appropriate for the adopted Local Plan.</p> <p>However, the Local Plan also makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The</p>

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				most appropriate, sustainable locations for economic development with the AAP area will be assessed and identified as part of the AAP. GAL have commenced work on their DCO application for use of the standby runway, which includes assessment of the economic implications. This will be subject to the DCO process.
REP191/794	Quod on behalf of Aberdeen Standard Investments		<p><b>1 Introduction</b></p> <p>We write on behalf of our clients, Aberdeen Standard Investments, in partnership with the Barker Trust, (jointly referred to as the “Landowners”) to set out their response to the Draft Crawley Borough Local Plan Review Early Engagement consultation.</p> <p>The Landowners are promoting an area of land to the north of the Manor Royal Business District (hereafter referred to as the “Site” and identified on Document 1) for employment uses to assist in meeting the substantial evidenced need which exists within the Borough.</p> <p>The Draft Local Plan identifies several specific consultation questions and those of relevance to the Site form the basis of this response. For contextual purposes, this letter begins by describing the Site and its surroundings, and then sets out the vision for its redevelopment, before turning to the consultation questions.</p> <p><b>2 Executive Summary</b></p> <p>The National Planning Policy Framework (“NPPF”) (2019) requires planning policies to help create the conditions in which businesses can invest and to set out a clear economic</p>	<p>Support for removing safeguarding noted. The council does not consider the government’s draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place.</p> <p>Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in</p>

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			<p>vision and strategy which positively and proactively encourages sustainable economic growth.</p> <p>Crawley is a geographically constrained Borough and has a substantial identified unmet employment need over the Plan period 2020 to 2035. The preferred location for this strategic growth within the Borough is to the north of Manor Royal and south or east of Gatwick Airport. Due to previous uncertainty over the Government's preferred location for additional runway capacity within the South East, much of this area (which includes the Site) has been historically safeguarded for a possible second runway at Gatwick Airport.</p> <p>However, this situation is now materially different as additional runway capacity in the South East is to be met by the Heathrow Northwest Runway as confirmed by the Airports National Policy Statement ("ANPS") June 2018. Furthermore, there is no evidence of the need for further runway capacity in the South East and Gatwick Airport have confirmed that they are no longer pursuing an additional wide-spaced runway (the purpose behind the previous safeguarding) in their 2019 Masterplan and within the EIA Scoping Report (September 2019) for the Development Consent Order ("DCO") application to make best use of the existing runways. There is no evidence, let alone robust evidence, for retaining the safeguarding as required by the NPPF.</p> <p>If the Local Plan is not prepared in a more positive manner this will result in an unsound plan. There is no robust evidence for the safeguarding to be maintained in line with the NPPF and this land, particularly in the preferred location to the north of Manor Royal, should be released for employment development to meet the identified need.</p>	<p>Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for economic development within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.</p>

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			<p><b>3 Site and Surroundings</b></p> <p>The Site is situated approximately 0.6 miles to the south of Gatwick Airport and directly to the north of Manor Royal Business District.</p> <p>The Site extends to c.17.9ha and comprises greenfield land, the majority of which is used for agricultural purposes and is broadly divided into 4 fields, separated by vegetated boundaries. There is a block of woodland in the south eastern corner of the Site, which forms part of Hydehurst Furze, and a public footpath (No.353) crosses the Site in a south-west to north-east direction. Several derelict buildings are also on Site, including a derelict residential property in the west and derelict farm buildings in the south.</p> <p>The southern boundary of the Site is defined by Hydehurst Lane beyond which situate the warehouse units within the Manor Royal Business District. Hydehurst Lane is built to adoptable standards and is owned by the Landowners. Two farm access gates are located off Hydehurst Lane into the Site. Crawter's Brook runs along the eastern boundary, with vegetated field boundaries forming the northern and north western extent of the Site. A hotel and public house are located on land to the west, in addition to a surface car park. Land to the north, east and west of the Site comprises further field boundaries, beyond which is Gatwick Airport and surrounding commercial development.</p> <p>The Site is accessed off London Road (A23), via Hydehurst Lane, which provides immediate access into Crawley, Gatwick Airport and the M23. A network of footways are located around the Site with bus stops situated along A23 and Fleming Way which provide access to several routes, including Gatwick Airport.</p>	

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			<p>In summary, the Site forms part of a wider expanse of greenfield land which separates Gatwick Airport from Crawley. Incursion has been made into this land including a hotel, a public house and car parks off the A23 to the west of the Site. The Site forms a natural extension to the adjoining the Manor Royal Business District.</p> <p><b>4 Vision</b></p> <p>The vision for the Site is for its redevelopment to provide employment floorspace (indicatively circa 700,000sqft to 800,000sqft). The Site consists of 4 fields which are of a sufficient size to provide a variety of development plots. The Site would be accessed via an existing high-grade road (Hydehurst Lane) which is owned by the Landowners and currently serves units within Manor Royal.</p> <p>Manor Royal makes a significant contribution to the economy of Crawley and the Gatwick Diamond. The Manor Royal Economic Impact Study Final Report (January 2018) confirms that there are over 600 businesses active with significant numbers in the wholesale, transport and manufacturing sectors, with over 22,000 people directly employed and an estimated 10,400 jobs supported in the supply chain.</p> <p>The Site represents a natural and logical extension to the adjoining the Manor Royal Business District, complementing its established role as the premier location for business floorspace within the Borough.</p> <p>The Site is sustainably located immediately adjacent to the A23 which provides immediate access into Crawley, Gatwick Airport and the M23. The Site is surrounded by a network of footways, which are relatively wide and often set back from the carriageway by a grass verge. Bus stops are located</p>	

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			<p>within walking distance of the Site along the A23 and Fleming Way and provide access to several routes, including Gatwick Airport, which provides interchange opportunities with bus and rail modes.</p> <p>No on Site constraints to redevelopment have been identified which cannot be resolved. For example, a public right of way crosses the Site which could either be diverted or incorporated within the development options for the Site. Also, a number of existing utilities are present on Site, including overhead electricity transmission cables, which could either be avoided or diverted. Existing attenuation storage areas on Site would either be retained as part of the development or relocated elsewhere.</p> <p>In summary, the redevelopment of the Site for employment purposes would complement the existing provision at Manor Royal and would utilise established transport connections and infrastructure. The Site represents an available and deliverable employment site to assist in meeting the substantial evidenced need which exists in the Borough.</p> <p><b>5 Consultation Questions</b></p> <p>As a geographically constrained Borough, Crawley has a substantial identified unmet employment need. To meet Crawley's needs the Adopted Local Plan identified an Area of Search in the north of the Borough. However, a significant proportion of this land is within the historic safeguarding for an additional runway at Gatwick Airport.</p> <p>The Site is being promoted to assist the Council in meeting this identified need for employment land. The Site falls within the Area of Search and partially within the safeguarding land which continues to be identified in the Draft Local Plan. As</p>	

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			<p>such, the topic areas that these representations respond to include:</p> <ul style="list-style-type: none"> <li>• The need for employment land;</li> <li>• Airport expansion safeguarding; and</li> <li>• Other related matters.</li> </ul> <p><b>Need for Employment Land</b></p> <p><i>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?</i></p> <p><i>Policy EC1- How best can the Local Plan seek to accommodate Crawley's identified employment needs?</i></p> <p>The NPPF requires planning policies to help create the conditions in which businesses can invest, expand and adapt with significant weight to be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (Paragraph 80).</p> <p>Paragraph 81 states that planning policies should:</p> <p><i>"a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;</i></p> <p><i>b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;</i></p> <p><i>c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and</i></p> <p><i>d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such</i></p>	



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			<p>as live-work accommodation), and to enable a rapid response to changes in economic circumstances”.</p> <p>Paragraph 82 also states that planning policies should recognise and address the specific locational requirements of different sectors.</p> <p>The NPPF requires that Local Plans set out strategic policies on the overall strategy for the pattern, scale and quality of development, and make sufficient provision for the various types of development including employment (Paragraph 20). Strategic policies should look ahead over a minimum 15 year period from adoption (Paragraph 22) and “<i>should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development</i>” (Paragraph 23). At Paragraph 35 the NPPF confirms that this will be tested during the examination to determine if the plan is “sound”. For a plan to be sound it will need to demonstrate that it is:</p> <ul style="list-style-type: none"> <li>• <b>positively prepared</b> which as a minimum seeks to meet an area’s objectively assessed needs;</li> <li>• <b>justified</b> providing an appropriate strategy based on proportionate evidence;</li> <li>• <b>effective</b> and deliverable over the plan period; and</li> <li>• <b>consistent with national policy</b>.</li> </ul> <p>The Adopted Local Plan Policy EC1 identifies employment needs and explains that while c.23ha of employment land has been identified within the Borough to meet short-term economic growth needs, “<i>as a minimum</i>” an additional 35ha of land for business uses is required to support future economic growth in Crawley. The policy identifies the preferred location for this strategic growth, stating the</p>	

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			<p><i>“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”</i>. However, at that stage owing to uncertainty as to the Government’s preferred location for additional runway capacity within the South East, much of this area was safeguarded for a possible second runway at Gatwick Airport.</p> <p>This situation is now materially different as additional runway capacity in the South East is to be met by the Heathrow Northwest Runway as confirmed by the ANPS published in June 2018. Furthermore, Gatwick Airport have confirmed that they are no longer pursuing an additional wide-spaced runway in their 2019 Masterplan and within the Environmental Impact Assessment Scoping Report (September 2019) for the DCO application to make best use of the existing runways. Therefore, there is no “robust evidence” for retaining the safeguarding as required by Paragraph 104 of the NPPF. This is discussed in more detail below.</p> <p>As detailed in the NPPF, local plans need to be produced based on available evidence. The Crawley Economic Growth Assessment Update (2015) (“Update EGA”) details that for the adopted Local Plan period 2015-2030, 57.9ha would be required for Class B development. Paragraph 9.15 of the Draft Local Plan refers to the emerging conclusions from the 2019 Economic Growth Assessment (“2019 EGA”) that there will be a need of between 44.6ha and 57.6ha over the Plan period 2020 to 2035.</p> <p>Paragraph 9.16 states that the Employment Land Trajectory (January 2019) identifies a reduced employment land pipeline of 13.19ha (reduced from 23ha) which is forecast to meet business growth in the short term but it is estimated that</p>	

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			<p>there will remain an outstanding need for at least a further 32.8ha of land just to meet the minimum baseline demand of 44.6ha to 2035. The Employment Land Trajectory 2019 identifies that most potential sites for development sit within the safeguarding area, c.136ha, whereas only c.14ha of employment land is within non-safeguarded land.</p> <p>Therefore, there is a substantial need for employment land, which if delivered in the Borough will provide several benefits. As well as the strategic and inward investment benefits, the delivery of this land would also bring specific direct and indirect benefits to the Borough including employment opportunities (the development of Site could provide up to c. 1,900 new jobs) to meet the needs of the growing population in a sustainable manner, which in turn would have multiplier effects for the local economy. This delivery would also provide an increased business rates base which will become increasingly important to the sustainability of local authority finances as the Government seeks to make authorities more self-sustaining through business rate retention.</p> <p>If this employment space cannot be delivered within the Borough, due to factors such as airport expansion safeguarding, the NPPF places a requirement for adjacent Local Planning Authorities to co-operate to meet unmet needs. Although this approach may theoretically address the overall quantitative need, the Borough would not receive many of the direct and in-direct benefit of this growth which would transfer to another authority.</p> <p>To address the requirements of the NPPF and create the conditions in which businesses can invest, expand and adapt, the Council should look to positively accommodate the identified employment need within the Borough, specifically</p>	

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			<p>within the preferred location to the north of Manor Royal (as detailed in Draft Policy EC1). The airport expansion safeguarding should be removed from the Draft Local Plan, as explained in detail later within these representations, and the land should be released to enable the substantial employment needs to be met.</p> <p>Paragraph 23 of the NPPF requires that strategic policies and the sites to accommodate objectively assessed needs should be addressed within local plans, and therefore if the Draft Local Plan is to be produced in accordance with national policy the Council will need to act more proactively in seeking to accommodate evidenced needs. Unless this approach is taken it is unlikely that a sound plan will be produced.</p> <p><b>6 Conclusions</b></p> <p>The Site provides a natural extension to Manor Royal Business District and is available and deliverable to assist the substantial identified employment land need.</p> <p>The emerging Local Plan in its current form risks being found unsound as it is not positively prepared or effective. A number of amendments should be made, in particular the airport expansion safeguarding removed and the land to the north of Manor Royal released for employment uses. This will ensure that the Council can proactively identify land to meet the substantial employment land need consistent with national planning policy.</p>	
REP191/795	Quod on behalf of Aberdeen Standard Investments	Policy EC2	<p><i>Policy EC2 Does the Policy plan positively for sustainable economic growth in Crawley?</i></p> <p>Paragraph 35 of the NPPF requires local plans to be positively prepared which as a minimum seek to meet an area's objectively assessed needs – its full needs.</p>	As above.

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			<p>The opportunity exists for the Council to identify land within the Borough to meet the unmet need. The situation regarding the safeguarded land is now materially different as the ANPS confirmed that additional runway capacity in the South East is to be met by the Heathrow Northwest Runway and Gatwick Airport have confirmed that they are no longer pursuing an additional runway.</p> <p>As such, there is no robust evidence for the safeguarding to be maintained and this land should be released for employment development. If the Council do not prepare the plan in a more positive manner it is unlikely to be found sound.</p> <p><i>Policy EC2 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?</i></p> <p>Economic development should make an efficient use of land and/or buildings in accordance with the NPPF which states that planning policies should promote an effective use of land while safeguarding and improving the environment and ensuring safe and healthy living conditions (Paragraph 117).</p> <p><i>Policy EC2 Does the Policy designate the correct Main Employment Areas; should any of the designated boundaries change?</i></p> <p>There is no robust evidence to support the Gatwick Airport safeguarding policy and the policy should be deleted. Following this deletion, the land to the north of Manor Royal should be released for development to meet unmet employment need. This should lead to the designated boundary of Manor Royal being amended to include such land. This will assist in ensuring that the plan has been</p>	

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			proactively prepared to meet evidenced needs and helps create the conditions in which businesses can invest, expand and adapt.	
REP191/796	Quod on behalf of Aberdeen Standard Investments	Policy EC9	<i>Policy EC9 Does the draft policy, as worded, sufficiently support the business function of Manor Royal whilst allowing flexibility for appropriate business supporting uses?</i> The draft policy as currently worded sufficiently supports the business function of Manor Royal and allows flexibility for business supporting uses.	Noted and support welcomed.
REP197/824	Reigate & Banstead Borough Council		<u>Economic Growth</u> We note that Crawley is currently updating its Economic Growth Assessment (EGA) and that the needs set out in the draft Local Plan is based on the emerging findings from this ongoing study. At the appropriate time, we would welcome the opportunity to review and input into this study, particularly given the specific economic and employment land issues between our respective areas.  We note – at paragraph 9.12 – that this EGA study will also “ <i>explore in greater detail the relationship of Horley Business Park in helping to accommodate Crawley’s unmet business land needs</i> ”. In this respect, we would direct you to our existing published evidence on this matter, notably the Strategic Employment Provision Opportunity Study (2016) and the Strategic Employment Site Economic Assessment (Chilmark, 2017). The latter of these studies specifically considers the need for the business park and its scope to meet employment needs from Crawley and other surrounding areas. Given this established, detailed evidence, we are concerned to ensure that any evidence prepared by Crawley has regard to, and is consistent with, its findings. Clearly, it also needs to be recognised that our own employment needs	CBC welcomes opportunities to continue on-going cooperation with RBBC and the EGA evidence has been shared with them for discussions to continue. The EGA recognises that the Horley Business Park is likely to meet some of Crawley’s unmet employment floorspace need.  The Local Plan plans for a constrained “past trends” scenario for employment growth which cannot all be accommodated in Crawley, and Policy EC1 has been amended to state that CBC will work with neighbouring authorities to assess the scope to help accommodate Crawley’s outstanding business land needs in appropriate and sustainable locations accessible to Crawley. However, the Plan also commits the council to the preparation of a North Crawley Area Action Plan, to consider the potential future needs of the airport alongside other development needs, including employment. Should this determine that some or all of the land currently safeguarded for airport expansion could be available for other

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			<p>may evolve over the life of any development on the business park. Through the duty to cooperate, we would expect to be directly and closely involved in any evidence that Crawley prepares on this matter and would ask that you provide urgent clarity and confirmation to this effect.</p> <p>It is noted that, given constraints, the draft Plan identifies a potential shortfall in employment land supply over the longer term compared to the latest evidence of needs. In this respect, we appreciate and agree that there will need to be ongoing joint working between ourselves, and other areas within the Gatwick Diamond, on this matter. This is consistent with our own Core Strategy (para 5.5.8) which acknowledges in broad terms that as partners we will <i>“work closely...to deliver the vision of the area as an internationally recognised business location with a global future in a sustainable way, including through the exploration of options for strategic development opportunities”</i>. However, we are concerned at this stage that Policy EC1 is unduly specific in seeking to identify a hierarchy of preferred broad areas outside of Crawley for potential new strategic employment land; some of which could clearly relate to land in Reigate &amp; Banstead, without any meaningful evidence to support potential deliverability/availability of land, introducing uncertainty for all stakeholders, including communities in Reigate &amp; Banstead. We believe that, at this stage, that Policy EC1 should be limited to a clear commitment to joint working on strategic opportunities, without the specificity on locations outside of Crawley.</p> <p>Given the potential scale of unmet employment needs arising from the draft Plan, we support in broad general terms, the commitment in Policies EC1 and EC2 to make best use of</p>	<p>uses, then the potential for further employment growth, in a less constrained scenario, will be considered. CBC will liaise with its neighbouring authorities during the preparation of the AAP.</p> <p>Policy EC5 (previously EC3) (Office Provision) is not seeking to promote office uses over other uses. The EGA identifies need for a minimum 27,200sqm office floorspace, and 103,700sqm industrial floorspace over the Plan period, and the Local Plan sets in place a framework that supports the delivery of both. The EGA also identifies specific qualitative issues relating to Crawley’s office floorspace, with much of the stock not of the quality/type that is sought by the market. This is serving to repress the office market in Crawley’s, and there is an opportunity for economic growth if offices of the right quality and type can be delivered.</p> <p>The policy is, therefore, seeking to encourage the delivery of Grade A offices within the Main Employment Areas. To help achieve this, the policy removes the NPPF requirement that planning applications for office development outside the Town Centre satisfy the sequential test. By removing this requirement for office uses, the Local Plan recognises that the Main Employment Areas are appropriate locations for office uses. In being positive to support</p>

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			<p>and intensify existing employment sites. However, we have significant concerns regarding the suggestion in paragraph 9.36 and the questions to Policy EC3 that the employment strategy should “<i>prioritise offices over other types of employment uses</i>”, including industrial and distribution.</p> <p>In our view, such an approach would fail to provide a broad cross section of employment opportunities and is likely to lead to lower skilled, lower value uses being disproportionately “exported” to neighbouring areas. It would also likely displace uses which are genuinely unsustainable transport patterns.</p> <p>Furthermore, in respect of our own Plan, the proposed Horley Business Park allocation in our own plan (DMP – HOR9) does offer scope to accommodate unmet strategic office needs arising from Crawley but, given the allocation specifies that the site will include only “<i>limited B1b, B1c, B8 and non-B class uses</i>”, it offers little scope to meet absorb the greater unmet industrial and warehouse needs. In this context, we are not convinced that it is necessary for Crawley to prioritise offices over other employment uses and we are concerned that doing so would likely lead to significant displaced industrial and warehouse needs which would have no realistic prospect of being met elsewhere across the economic sub-region.</p> <p>In view of the above, we look forward to engaging with you further in the preparation of your new Economic Growth Assessment and as you finalise the economic strategy within the Plan.</p>	<p>high quality office uses, the policy is not seeking to preferentially support office uses at the expense of other business uses. Rather, it is seeking to address an identified qualitative provision issue and provide a supporting framework through which to help achieve this.</p>
REP198/836	The Ifield Society		<ul style="list-style-type: none"> <li>• <b>How do you think the employment skills gap should be addressed?</b></li> </ul>	<p>Noted. CBC is working with further education providers.</p>



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			<p>Make Crawley a University town, and/or City status (Gatwick City perhaps?) and/or Unitary Council status.</p> <ul style="list-style-type: none"> <li>• <b>Do you think the evening and night-time economy should be supported? If so, how?</b></li> </ul> <p>Yes. Improved transport links e.g. more frequency in evening and night-time (e.g. like no.200 Bus).</p>	Support noted. The Local Plan, and the Council's emerging Transport Strategy support improvements to public transport.
REP209/934	Horsham District Council	Para. 9.21	<p><b>Economy</b></p> <p>As you know, work is currently being undertaken to update the Employment Growth Assessment (EGA). We agree that this study will help inform the level of employment growth that is required over the plan period in both Crawley and wider northwest Sussex including within Horsham District. We note the statement in paragraph 9.21 which sets out that your Council will continue to work alongside other authorities in the Gatwick Diamond to help investigate the scope and implications of additional employment land coming forward in areas adjoining Crawley / Gatwick. Horsham District. We welcomes this approach. It should be noted that this Council is seeking to ensure that the step change in housing numbers required by government does not come forward at the expense of the opportunities for new residents to be able to live and work locally, either within Horsham District or within the wider northwest Sussex / Gatwick Diamond as a whole. We consider that it will be important to consider how best a range of high quality and complementary employment opportunities can be provided within the northwest Sussex area and Gatwick Diamond more generally.</p>	Noted. CBC will continue to liaise with HDC.

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REP120/335	Mole Valley District Council	Policy GAT2	<p><b>Gatwick Airport</b> MVDC notes that CBC are considering extending the land safeguarded under Policy GAT2 to match the boundary proposed for Option 3 in Gatwick Airport's Master Plan (subject to resolving the safeguarding issue). Currently, MVDC safeguards a small area of land along Lowfield Heath Road to the north west of the existing runway for airport expansion purposes. The Gatwick Master Plan's proposed expanded boundary includes further land within Mole Valley. Should CBC decide to expand the area of land that is safeguarded, it would be pertinent for MVDC to follow suit and for both CBC and MVDC to safeguard land for the same boundary.</p> <p>MVDC intends to hold a Regulation 18 consultation on a draft Future Mole Valley Local Plan in October of this year. We will continue to safeguard the existing parcel of land in Mole Valley for airport expansion purposes, unless CBC come to a decision before then to either expand the safeguarded area, or to remove the safeguarding policy entirely. We would be grateful if you would keep us informed on the matter.</p>	<p>Noted.</p> <p>The council does not consider the government's draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place.</p> <p>Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape</p>

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				and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for development and infrastructure within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.
REP154/492	Manor Royal BID		<p><b>Gatwick Airport and safeguarding</b></p> <p>The Local Plan asks questions concerning the status of the area safeguarded for potential future runway expansion and the revised future boundary of the airport should, at some point in the future, another runway is given consent.</p> <p>The Manor Royal BID recognises the contribution of the airport to Manor Royal and the wider economy and that the two areas share a dynamic tension, given their close proximity. This represents a form of co-dependence and independence best illustrated by the fact that an expanded Gatwick would result in a significant loss of employment floorspace in Manor Royal and displacement of businesses while simultaneously creating more demand for employment floorspace, jobs and infrastructure.</p> <p>The requirement to safeguard land to the north of Manor Royal has both frustrated development and has been problematic for any</p>	<p>The council does not consider the government's draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. It is understood the publication of the final Aviation Strategy has been delayed into 2020. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place.</p> <p>Therefore, the Local Plan makes a commitment to assess, through an Area</p>

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			<p>development at or near to the boundary of the safeguarded area – the status of which has been rigorously defended.</p> <p>A bigger busier Gatwick Airport has both potential positive benefits and negative, downside implications for Manor Royal as well as the wider area. These are covered in the Manor Royal BID’s response to the Gatwick Airport Masterplan consultation (Appendix B), which remain valid given the lack of detail about how these competing pressures would be addressed.</p> <p>It is disappointing to see the boundary of the safeguarded area further extending into Manor Royal with the subsequent increased loss of vital employment floorspace, displacement of businesses and development constraints previously referred to.</p> <p>Given the demand for land to support the growth of Crawley a review of the safeguarded area has merits. This needs to be balanced against the wider regional and national economic need of airport expansion. It would seem sensible to await the guidance offered by the Aviation Strategy (December 2019) before making a decision on the safeguarded area and, subject to that, undertake a full appraisal of the merits and implications of retaining or lifting the status of safeguarded land to the north of Manor Royal.</p> <p><b><i>*Appendices Attached to Representation*</i></b></p>	<p>Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for development and infrastructure within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.</p>

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REP155/506	West Sussex County Council	Para. 10.4	<b>WSSC Highways Gatwick Airport</b> <b>Paragraph 10.4:</b> rather than the draft Gatwick Airport Master Plan (October 2018), it is pertinent to refer to the final Gatwick Airport Final Master Plan 2019 and figures in this report.	Noted. Text to be updated to refer to the Gatwick Airport Master Plan 2019.
REP155/507	West Sussex County Council	Para. 10.6	<b>WSSC Highways</b> <b>Paragraph 10.6:</b> Development Consent Order: it is suggested that CBC consider inserting a paragraph on the current status of the DCO and proposed DCO timescales.	The most up to date position on the DCO process has been added at para 10.13.
REP155/508	West Sussex County Council	Para. 10.9	<b>WSSC Highways</b> <b>Paragraph 10.9:</b> Under the main evidence based documents reference is made to Draft Gatwick Airport Master Plan (Gatwick Airport Limited, October 2018). This should be amended to refer to ' <i>Gatwick Airport Final Master Plan (Gatwick Airport Limited, 2019)</i> '	Noted. Evidence base documents list has been updated to reflect publication of Gatwick Airport Master Plan 2019.
REP155/509	West Sussex County Council	Para. 10.11	<b>WSSC Highways</b> <b>Paragraph 10.11:</b> the last sentence should be amended to read: ' <i>...additional runway to the south of the airport which could increase capacity to around 95mppa within 20 or 25 years <b>from opening the additional runway</b></i> '	Noted and text amended.
REP22/529	Thames Water	Policy GAT2	Further to our letter dated 2nd August we would like to make the following additional comments: <b>Strategic Policy GAT2: Safeguarded Land Consultation Questions:</b> <b>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?</b> We support Option 2 to delete the Gatwick Airport Safeguarded Land policy. The safeguarded area includes Thames Water's Crawley Sewage Works and therefore is directly affected by Policy GAT2 which	Support for removing safeguarding noted. The council does not consider the government's draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough

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			<p>provides uncertainty in relation to future upgrades at the sewage works.</p> <p>There are currently no approved plans for an additional runway at Gatwick Airport and this does not form part of the Government's Aviation Strategy and therefore the safeguarding should be removed.</p> <p>The consultation sets out at paragraph 10.21 that if the safeguarding is 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."</p> <p>Any such review of development opportunities in the area, where they are within 800m of Crawley Sewage Works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.</p> <p>Paragraph 170 of the NPPF, February 2019, sets out that:  "Planning policies and decisions should contribute to and enhance the natural and local environment by: ....e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans..."</p>	<p>boundary if safeguarding remains in place.</p> <p>Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. The implications of the presence of the Crawley Sewage Treatment Works will be considered as part of this work. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for development and infrastructure with the AAP area will be</p>

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			<p>Paragraph 180 goes on to state: “Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development....”</p> <p>The odour impact study would establish whether new resident’s amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer. On this basis, text similar to the following should be incorporated into the Neighbourhood Plan: “When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided.”</p> <p><b>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?</b></p> <p>We do not agree that the Local Plan should continue to safeguard the land as there is no justification for this. However, if it does, Crawley Sewage Works should be removed from the safeguarding.</p>	assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.
REP162/557	Sussex Ornithological Society	Policy GAT1	<p><b>Chapter 10: Gatwick Airport</b></p> <p>10. The area within the Gatwick Airport boundary has some rich areas for wildlife. This needs to be recognised. We would therefore like to see an addition to Policy GAT1 inserted after iv) as follows:</p>	GAT1 has been amended to include biodiversity in GAT ii) Biodiversity is also protected by Policies GI2 and GI3.

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			<i>v) The impacts of any new developments on biodiversity within the boundaries of the airport must be assessed and if necessary mitigation should be implemented to avoid any net loss of biodiversity occurring.</i>	
REP172/602	Vail Williams on behalf of Jersey Farm landowners		<p><b>Gatwick</b> In regard to Gatwick Airport and in particular the safeguarding area as identified under policy GAT2 “Safeguarded Land” it is recognised that the Council is seeking views under the Regulation 18 Issues and Options Consultation for two options: (1) for safeguarding land and; (2) to delete the policy. Our client has made representations both to the Gatwick Master Plan and to the 2018 Aviation Strategy, that identified that local planning authorities should be considered to have within their gift, the ability to safeguard land should they wish to.</p> <p>We understand that Crawley Borough Council and their members have identified that they wish to seek to lift safeguarded land to the north of Manor Royal and to the south of Gatwick Airport. We have also supported this approach and our representations to both documents align with this approach.</p> <p>The Local Plan consultation seeks clarification as to where the boundary should be and whether the Local Plan 2035 should continue to safeguard land for future wide space runway at Gatwick Airport. We would therefore agree with option 2, that the safeguarded land should be removed allowing the strategic employment development identified within the Economic Growth chapter to be delivered. This will also assist with further land supply given the land supply shortfall across the region.</p>	<p>Support for the removal of safeguarding noted.</p> <p>The council does not consider the government’s draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place.</p> <p>Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including</p>



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				employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for development and infrastructure within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.
REP174/614	Gatwick Airport Limited	Para. 10.1 – 10.9	<p>Chapter 10: Gatwick Airport</p> <p>Chapter 10 starts with some introductory text and then sets out four overarching consultation questions before setting out the planning policy considerations which are specifically relevant to the future development of Gatwick Airport.</p> <p>GAL's response follows this structure and sets out our comments on the supporting text in paragraphs 10.1 to 10.10. We then respond to the 4 Chapter Consultation Questions. We then provide detailed comments on policies GAT1 to GAT4 and the detailed questions associated with each policy and the reasoned justification to the policy wording.</p>	

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			<p>GAL Response and proposed amendments to introductory text (paragraphs 10.1 to 10.10)</p> <p>Paragraph 10.1 – This paragraph is noted</p> <p>Paragraph 10.2 – GAL believes this paragraph needs to be amended to reflect the wording in the draft Aviation Strategy and in particular the Government’s proposal to consider the long term capacity needs for aviation and to more accurately reflect Government policy on safeguarding.</p> <p>The text below sets out how we believe Paragraph 10.2 should be reworded including text to be deleted as <del>striketrough</del> and new text to be inserted in <i>italics</i>.</p> <p>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. <del>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. The draft document states that, in relation to future growth, the government will need to consider whether there is a need for further runways beyond 2030. The draft document outlines ways in which the need can be determined including through a National Infrastructure Commission sector study; an independent commission (like the Airports Commission); or an aviation NPS to either set out the criteria any development consent application would need to meet, or by naming airport(s). 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</del></p>	<p>The structure and text of the introductory sections has been amended, and paragraph numbers have changed.</p> <p>10.1 and 10.2 (now 10.6 and 10.7) text amended using quotes in full from government policy, including the National Aviation Policy Framework 2013 and the Aviation 2050 Green Paper.</p>

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			<p>local authorities in their Local Plans to consider the future needs of airports. <i>It also states that "it is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth" (para 3.66). It recommends that local authorities consider the need for future airport development when developing local plans. The National Planning Policy Framework (2019) also requires local plans to provide for any large scale transport facilities that need to be located in the area, and for the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements (para 104(e)).</i></p> <p><i>Whilst NSIPs are subject to a separate planning process within the national planning regime, the policies set out within chapters 3-16 of the draft Plan will inform any Local Impact Report submitted by the Council to the Secretary of State in connection with the determination of an NSIP.</i></p> <p>The council has sought greater clarity on the requirement to safeguard land in <i>The</i> final Aviation Strategy <i>is</i> 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.</p> <p>Paragraph 10.3 – GAL believes this paragraph needs to be updated to reflect a more up to date position.</p>	

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			<p>The text below sets out how we believe Paragraph 10.3 should be reworded including text to be deleted as strikethrough and new text to be inserted in <i>italics</i>.</p> <p><del>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 <i>An existing S106 Agreement signed</i> between Gatwick Airport, WSCC and CBC <i>in April 2019</i> 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.</del></p> <p>Paragraph 10.4 – GAL believes this paragraph needs to be updated to reflect the publication of the Gatwick Airport Master Plan in July 2019.</p> <p>The text below sets out how Paragraph 10.4 should be reworded including text to be deleted as strikethrough and new text to be inserted in <i>italics</i>.</p> <p><del>10.4 The draft Gatwick Airport Master Plan (<i>July 2019</i>) anticipates capacity on its single runway could increase by about 15 to <i>between 58 and 61</i> million passengers per annum <i>by 2032 / 33</i>. The draft <i>Gatwick Airport</i> 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.</del></p> <p>Paragraph 10.5 – This paragraph is noted. GAL welcomes the acknowledgement that it generates significant economic benefits.</p>	<p>10.3 (now 10.9) – text amended.</p> <p>10.4 (now 10.10) text amended.</p> <p>10.5 (now 10.1) Text to be amended, including reference to the airport and the councils around the airport working</p>

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			<p>We believe the paragraph could be updated to acknowledge the efforts made by the airport to limit, and where possible, reduce any significant effects.</p> <p>Paragraph 10.6 – GAL believes this paragraph needs to be updated.</p> <p>The text below sets out how Paragraph 10.6 should be reworded including text to be deleted as <del>strike through</del> and new text to be inserted in <i>italics</i>.</p> <p>10.6 The borough council is consulted on any developments which the airport operator proposes to undertake under its <del>extensive</del> 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 <i>through</i> 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 <del>considered</del> <i>determined</i> by the Secretary of State <i>for Transport</i>, advised by the Planning Inspectorate through the Development Consent Order (DCO) process.</p> <p>Paragraphs 10.7, 10.8 and 10.9 – GAL considers the key issues are all relevant although various documents in the evidence base, such as the Gatwick Airport Master Plan (July 2019) should relate to the latest / current version.</p> <p><b>Gatwick Airport Chapter Consultation Questions</b></p> <p><b>Consultation Question: What key issues do you think should be considered to ensure any growth at Gatwick Airport is sustainable?</b></p> <p>Government in its publication ‘Beyond the Horizon’ The Future of UK Aviation (2018) positively promotes that airports should make</p>	<p>together to seek to reduce any significant adverse effects.</p> <p>10.6 (now 10.2) text amended.</p> <p>Updates made in corresponding paras.</p> <p>Responses provided against Policies below.</p>

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			<p>best use of their existing runways by maximising the efficiency of their current assets subject to meeting environmental considerations. GAL recognises that the draft Plan needs to support the further development of the airport whilst ensuring its growth is sustainable. In addition, the National Planning Policy Framework (2019) also requires '<i>local plans to provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements</i>' (para 104(e)).</p> <p>GAL consider that the draft Plan should include appropriate measures to ensure any growth at Gatwick Airport is sustainable and its impact on the local area will be acceptable. To ensure that adverse impacts are appropriately considered GAL suggests that, where necessary, any adverse impacts are controlled and managed to still allow for the benefits of the sustainable growth of the airport to be fully realised. GAL considers that, where the draft Plan requires mitigation is to be applied to new airport development, there should also be the utilization of suitable planning conditions to ensure the effectiveness of such mitigation measures. In addition, an important consideration is that there is an existing S106 Agreement between GAL, WSCC and the Council which supports the growth of the airport and does require the implementation of control measures to ensure environmental impacts if the airport are appropriately managed.</p> <p><i>(GAL make further comments on this matter in response to the consultation questions on Policy GAT 1)</i></p>	

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			<p><b>Consultation Question: 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?</b></p> <p>GAL strongly supports that all new airport related car parking should only be afforded planning consent within the airport boundary. GAL considers that the creation of new and replacement off airport car parking is contrary to the key themes of the National Planning Policy Framework and the overarching objectives of sustainable development. GAL has capacity on airport to meet the current passenger needs and the forecast future demand as is identified in the GAL Car Parking Strategy. Importantly the predicted future growth of passengers and the public mode share targets which GAL have committed to achieving can be met through a car parking provision on airport, without prejudicing the operational needs of the airport. The committed investment in on airport car parking infrastructure has also been made public in the GAL Capital Investment Programme.</p> <p>The creation of new off airport car parking operations simply inhibits GAL's ability to achieve greater modal shift of passengers and staff towards the use of public transport. Off airport parking therefore serves to hinder the ability of the airport to deliver improvements in sustainable travel and upwards modal shift patterns. The proposed policy approach in the draft Plan serves to compliment and support the airport related car parking policies in the development plans adopted by the Councils neighbouring local planning authorities such as Reigate &amp; Bansted Borough Council and Tandridge District Council. Thus, the proposed approach promoted by the draft Plan for airport car parking to be 'on airport' provides for a consistent and robust direction being adopted by the Council and in accordance with the planning policies of other local councils which neighbour</p>	

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			<p>the airport. GAL strongly supports that airport related car parking is the most sustainable approach for the draft Plan to promote. <i>(GAL make further comments on this matter in response to the consultation questions on Policy GAT 3)</i></p> <p><b>Consultation Question: Should land south of Gatwick Airport continue to be safeguarded for a potential future wide spaced additional runway?</b></p> <p>Government policy currently requires land around Gatwick to be safeguarded for an additional runway and associated facilities in the future. The Government has produced its Draft Aviation Strategy (Aviation 2050) and there has been no suggestion from Government that safeguarding of land at Gatwick for a possible new runway is no longer required and therefore paragraph 5.9 of the APF continues to remain extant. In addition, the draft Aviation Strategy also recommends that local authorities consider the need for future airport development when developing local plans (<i>para 3.66</i>) GAL considers it absolutely crucial that the draft Plan accords with national policy and continues to safeguard land at Gatwick for the possible development of a future runway to the south of the airport.</p> <p>GAL work constructively with Crawley Borough Council to ensure that, in the safeguarded land area, new development does not take place which would be incompatible with a future possible runway to the south of the airport. While the Gatwick Master Plan 2019 identifies that GAL are not actively pursuing an additional runway (to the south) it remains in the national interest to continue with this strategy of land safeguarding. This will preserve the option of building an additional runway (to the south) to meet the future airport capacity gap beyond 2030 that Government's forecasts indicate will occur even with a third runway constructed at Heathrow - and which will fall within the horizon of the new Local Plan</p>	



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			<p>Crawley 2035. GAL believes it is therefore in the national interest for land around Gatwick to remain safeguarded from incompatible forms of development and as such this needs to be reflected in the draft Plan.</p> <p><i>(GAL make further comments on this matter in response to the consultation questions on Policy GAT 2)</i></p> <p><b>Consultation Question: Should the Airport Boundary be changed to the boundary shown in the Airport Master Plan?</b></p> <p>GAL believes that it is imperative that the airport boundary shown in the draft Plan is updated to accord with the airport boundary illustrated in Plan 4 of the Gatwick Master Plan 2019. The airport boundary shown in the Gatwick Master Plan is defined by the land which is owned by Gatwick Airport Limited as well as some additional parcels of land which are not GAL owned but are used for airport-related purposes. These additional land parcels are either surrounded by GAL owned land or are positioned immediately adjacent to GAL owned land. It is important for the draft Plan to accord with Plan 4 of the GAL Master Plan 2019 in order to ensure that when new development is brought forward that the developers and decision makers have certainty of the schemes precise location in relation to the airport boundary and therefore the planning policies which will apply in the determination of a proposal. The absence of such consistency between the of the airport boundary in the draft Plan and that as identified in the Gatwick Master Plan (2019) has the potential to create confusion on whether a site is within or outside of the airport boundary and this may lead to unnecessary planning appeals and thereby reduce the effectiveness of the draft Plan.</p> <p><i>(GAL makes further comments on this matter in response to the consultation questions on Policy GAT 1)</i></p>	

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REP174/615	Gatwick Airport Limited	Policy GAT1	<p><b>Development of the Airport</b>  <b>Strategic Policy GAT1: Development of the Airport with a Single Runway</b>  The draft plan contains 3 questions in relation to GAT1:</p> <p><b>Consultation Question - 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?</b>  <b>Consultation Question - Are there any other measures you think should be included?</b></p> <p>GAL consider that the Policy GAT1 includes appropriate measures to ensure any growth at Gatwick Airport is sustainable and its impact on the local area will be acceptable. Government in its document 'Beyond the Horizon' The Future of UK Aviation (2018) reaffirms that airports should make best use of their existing runways by maximising the efficiency of their current assets subject to meeting environmental considerations. The GAT1 policy approach is therefore broadly in line with the need to support the further development of the airport whilst ensuring its growth is sustainable.</p> <p>The government has published its draft Aviation Strategy, "Aviation 2050"; which states that in relation to future growth that the '<i>government will need to consider whether there is a need for further runways beyond 2030</i>'. The draft document also states that "<i>it is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth</i>". As the Local Plan will have a strategic horizon to 2035 GAL considers it important that the need for safeguarding of land for a possible runway to the south of the current airport boundary as</p>	<p>Support for GAT1 welcomed.</p> <p>Response regarding safeguarding covered under Policy GAT2 below.</p>

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			<p>part of its future potential long term sustainable growth is made clearer in Policy GAT1.</p> <p>In addition, the draft Aviation Strategy also recommends that local authorities consider the need for future airport development when developing local plans (<i>para 3.66</i>) - GAL considers that GAT1 broadly serves that purpose in the proposed draft Plan.</p> <p>The National Planning Policy Framework (2019) also requires '<i>local plans to provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements</i>' (para 104(e)). GAL considers Policy GAT1 broadly satisfies this purpose.</p> <p>GAL has made clear in the Gatwick Airport Master Plan 2019 its intention to bring forward a DCO application for the routine use of the Airports existing stand by runway as part of the airports sustainable growth. The GAT1 policy identifies the policy requirements where the development will be an NSIP, thereby acknowledging the further growth potential of the airport. GAL considers that the general focus of Policy GAT1 should shift more towards supporting the broader sustainable growth of the airport, in line with current and up to date Government aviation policy rather than being narrowly focussed on a single runway operation.</p> <p>GAL considers that wording in the adopted Policy GAT1 (Local Plan 2015 'Crawley 2030') version of bullet (ii) for the requirement for '<i>satisfactory safeguards to be in place to mitigate the impact of the operation of the airport.....</i>' is a more effective approach for</p>	<p>Policy GAT1 continues to support the growth of the airport on a single runway basis, but the Council has not yet seen evidence to determine whether or not the use of the northern runway, currently being considered through the DCO process, could be supported in terms of its impact on the local environment and infrastructure. The policy therefore highlights the issues which the DCO process should address.</p>

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			<p>managing and mitigating impacts as it offers more clarity than the wording currently proposed in the draft Plan Policy GAT1 bullet (ii). To ensure that adverse impacts are appropriately considered GAL suggests that Policy GAT1 should provide that, where necessary, such impacts are “<i>controlled and managed</i>” rather than “<i>minimised</i>”. This is because, whilst GAL does seek to minimise impacts of development, there has to be a balance between minimising impacts and securing the benefits of development, such that in some cases minimising rather than mitigating impacts of a development might be incompatible with securing and maximising its overall benefits and sustainable growth.</p> <p>GAL further suggests that, where the policy requires mitigation and benefits to be applied, Policy GAT1 should also require the use of planning conditions rather than the sole mechanism of a S.106 Agreement. We consider this to be necessary because in most cases such mitigatory measures can be secured through planning conditions.</p> <p><b>Consultation Question - 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?</b></p> <p>It is imperative to the determination of future planning applications and development proposals in the borough that the draft Plan accurately identifies the airport boundary. The airport boundary in the draft Plan should be consistent with the Gatwick Master Plan 2019 to reflect land that is owned by GAL and which GAL manages, or if not owned by GAL is used for airport purposes. GAL therefore considers that the airport boundary in the draft Plan should reflect</p>	<p>Policy amended to refer to conditions.</p> <p>Disagree that the Local Plan Policy boundary for the Airport should be the same as the Masterplan boundary, which (as stated in the Masterplan) is defined by the land which is owned/managed by GAL. The Local Plan Airport Boundary is a policy</p>

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			<p>that shown in the Master Plan (Plan 4). The minor revisions to the airport boundary in the Master Plan are explained and justified at paras 2.3.3 – 2.3.5 of the Master Plan, and for these same reasons GAL considers that the current airport boundary shown in Plan 4 should be adopted in the draft Plan.</p> <p><b>GAL Response to Policy GAT 1 – Development of the Airport with a single runway</b></p> <p>GAL broadly supports Policy GAT1. However, given the draft plan runs to 2035, GAL considers it essential that the policy should enable the consideration of all future airport development proposals over the plan period. GAL therefore proposes the following policy text amendments:</p> <p><b>Strategic Policy GAT1: Development of the Airport with a Single Runway</b></p> <p>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 <del>as a single runway two terminal airport</del> provided that:</p> <p>i. The proposed use is appropriate within the airport boundary and contributes to the safe, secure and efficient operation of the airport; and</p> <p>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 <del>minimised</del>, <i>controlled and where necessary required appropriately mitigated</i> mitigation is provided <del>and as a last resort fair compensation is secured</del>, and</p> <p>iii. Adequate supporting infrastructure, <i>as necessary</i>, including for surface access, <i>can be put</i> in place; and</p> <p>iv. <i>Where considered necessary and appropriate, the</i> benefits to Crawley's local economy and community are maximised.</p>	<p>boundary which supports development within it which contributes to the sustainable growth of the airport, including airport-related parking (Policy GAT2) and therefore it is important that is drawn tightly so as to ensure the best use of airport land and to protect the countryside beyond the airport. The boundary is clearly defined on the Local Plan Map and will be the boundary used in the determination of planning applications. However, some amendments have been made to the Airport Boundary.</p> <p>Part of the wording from the adopted Plan will be added into ii) in relation to satisfactory safeguards in place to mitigate. However, the first priority should be to minimise any adverse</p>

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			<p><del>The control or mitigation, compensation, of impacts as appropriate, and any associated infrastructure and benefits, will be expected to be secured through an appropriate package of planning conditions (Requirements for a DCO) and / or S106 obligations.</del></p> <p><del>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.</del></p> <p>As 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 future expansion of the airport to accommodate the construction of an additional wide spaced runway.</p> <p><b>Reasoned Justification – Paragraphs 10.12 to 10.15</b> Paragraph 10.12 – GAL believes this paragraph needs to be updated.</p> <p>The text below sets out how Paragraph 10.12 should be reworded including text to be deleted as <del>strike through</del> and new text to be inserted in <i>italics</i>.</p> <p>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 <del>extensive</del> permitted development rights for new facilities to support rising passenger numbers. Measures are in place <del>However</del>, 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</p>	<p>impacts. Compensation should also be provided as a last resort.</p> <p>iii) Text to be partially amended</p> <p>iv) Disagree. Aviation 2050 states that aviation provides significant economic and social benefits. Crawley is significantly affected by the airport and its community should benefit from any growth. Text to be partially amended</p> <p>.</p> <p>Response regarding safeguarding covered under Policy GAT2 below.</p> <p>10.12 Text to be partially amended Council considers it is important that</p>

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			<p>efficient operation of the airport and that <i>where necessary</i> impacts <i>are</i> minimised or mitigated <i>as appropriate</i> <del>as required</del>, sufficient supporting infrastructure <i>can be put in place</i> <del>in place</del>, and <i>related</i> local benefits are <del>maximised</del> <i>optimised</i>. <del>The council will also consider the cumulative impact of numerous small developments. A further S106 Agreement will be sought.</del></p> <p>Paragraph 10.13 – GAL believes this paragraph needs to be updated.</p> <p>The text below sets out how Paragraph 10.13 should be reworded including text to be deleted as <del>striketrough</del> and new text to be inserted in <i>italics</i>.</p> <p>10.13 <i>Sections 14 and 23 of the Planning Act 2008 define Nationally Significant Infrastructure Projects to include the construction extension or alteration of a runway or building at an airport expected to be capable of increasing by at least 10 million per year the number of passengers for whom the airport is capable of providing air passenger transport services, or of increasing by at least 10,000 per year the number of air transport movements of cargo aircraft for which the airport is capable of providing air cargo transport services.</i></p> <p><del>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</del> <i>Applications for such developments</i> would therefore be determined by the Secretary of State through the Development Consent Order (DCO) process. The <del>draft</del> <i>Gatwick Master Plan 2019</i> <del>master plan</del> proposal to use the standby runway would increase capacity by <del>about</del> <i>over 10 04mppa</i> and would therefore be determined through a DCO <i>process</i>. The council would expect the environmental impacts to be <i>controlled</i></p>	<p>the cumulative impact of numerous small developments is considered.</p> <p>10.13 Text to be partially amended</p>

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			<p>minimised, and <i>or</i> mitigated <i>as appropriate, any necessary</i> infrastructure <i>to be</i> provided, and <i>related</i> benefits to the local area <i>to be</i> maximised.</p> <p>Paragraph 10.14 - No Change Proposed</p> <p>Paragraph 10.15 - GAL believes this paragraph needs to be updated.</p> <p>The text below sets out how Paragraph 10.15 should be reworded including text to be deleted as <del>struck through</del> and new text to be inserted in <i>italics</i>.</p> <p>10.15 <del>If</del> <i>As</i> land <del>continues</del> <i>is required to be</i> 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.</p>	Response regarding safeguarding covered under Policy GAT2 below.
REP174/616	Gatwick Airport Limited	Policy GAT2	<p><b>Future Runway Development and Need for Safeguarding Strategic Policy GAT2: Safeguarded Land</b></p> <p>The draft plan contains 4 questions in relation to GAT2:</p> <p><b>Consultation Question - 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?</b></p> <p>GAL considers that the Local Plan 2035 should continue to safeguard land for a possible future runway to the south of the airport. Whilst the Government has adopted the Airports National Policy Statement, supporting the development of a third runway at Heathrow, this does not alter currently adopted national policy, derived from the 2003 Air Transport White Paper and the 2013 Aviation Policy Framework, that land should be safeguarded at Gatwick for an additional runway.</p>	<p>The council does not consider the government's draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place.</p> <p>Therefore, the Local Plan makes a commitment to assess, through an Area</p>



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			<p>The Government is now in the process of reviewing aviation policy and Government has given no indication that safeguarding of land at Gatwick should discontinue. Government has published the UK Aviation Strategy Green Paper: Aviation 2050: The future of UK aviation which states that:</p> <p><i>“it is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth”</i> (para 3.66)’. </p> <p>As such, and pending the Governments final review of national policy in the UK Aviation Strategy (which is expected to be published at the end of 2019), there remains a national policy requirement to continue to safeguard the identified land around Gatwick in order to ensure that the option for future additional runway development to the south of the airport is not prejudiced or compromised by new development.</p> <p>Until Government has decided whether land should (or should not) continue to be safeguarded at Gatwick, it would plainly be premature for the draft Plan to remove safeguarding. Hence GAL considers that the draft Plan must require that land at Gatwick will remain safeguarded until any such policy approach has been changed by Government direction.</p> <p>GAL would like to highlight that we undertook a public consultation in 2018 (as part of the Gatwick Master Plan engagement) which received over 5000 responses. There was clear support (59%) for the continued safeguarding of land for an additional runway (to the south) in case it should it be required in the future.</p> <p>The Aviation Policy Framework clearly requires that land outside existing airports that may be required for airport development in the</p>	<p>Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for development and infrastructure within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area, amended to reflect the Gatwick Airport Master Plan 2019. The airport operator will</p>

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			<p>future needs to be protected against incompatible forms of development. The requirement for safeguarding of land in Policy GAT2 Option 1 also ensures that other development in the borough does not compromise or prejudice such future potential development which is of national importance. GAL considers that it would be irresponsible for the Council to discontinue safeguarding land at Gatwick for longer term development beyond 2030 when further UK airport capacity may be required.</p> <p><b>Consultation Question - 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?</b></p> <p>GAL considers that the boundary of the safeguard land within the draft Plan should be amended to accord with the safeguarded boundary contained in the Gatwick Masterplan 2019 Plan 21 (Safeguarded Land).</p> <p>This boundary shown in Plan 21 of the GAL Masterplan 2019 reflects the detailed work GAL undertook during the Airports Commission process over the period 2012 - 2015. This work was far more detailed than the work undertaken in period immediately post the 2003 Air Transport White Paper, which was used to define the boundary in the 2005 Gatwick Master Plans and carried forward in the 2012 Masterplan and 2015 Crawley Local Plan.</p> <p>In particular, the boundary now shown in the 2019 Masterplan Plan 21 reflects detailed airport planning, environmental and transport assessment work which was carried out in response to the Airports Commission process with in depth consideration given, inter alia, to the optimum route of a diverted A23 and a diversion route for the Crawters Brook and the River Mole, which are considered to be</p>	continue to consulted on applications within this area.

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			<p>necessary in the event that an additional runway (to the south) were to come forward in the future.</p> <p>If the draft Plan was to continue with the previous safeguarded boundary as shown in the currently adopted Local Plan Crawley 2030, there is a high risk that development would take place on land that would subsequently be needed in the event that an additional runway (to the south) were to come forward. Such development would add to the costs and complexities of this nationally significant project, thereby undermining the central purpose of the safeguarding land policy. It is therefore in GALs view imperative that the draft Plan reflects the same safeguarded land boundary as is shown in the Gatwick Master Plan 2019. This will serve to ensure greater certainty for developers as there will be greater consistency in the safeguarded boundary area within the draft Plan and the Master Plan and allow for land which is developable to be clearly identifiable and thereby assisting to avoid unnecessary planning appeals.</p> <p><b>Consultation Question - Please explain where and why if you suggest a different boundary?</b></p> <p>As already explained, GAL firmly believes the draft Plan should adopt and be consistent with the safeguarded land boundary in the recently published and up to date Gatwick Airport Master plan.</p> <p><b>Consultation Question - Do you agree that, if land continues to be safeguarded for a future runway, that the future noise impacts associated with a possible additional runway should be taken into account in planning decisions?</b></p> <p>GAL agrees that it should be identified in the draft Plan that the requirement to safeguard for the option for an additional runway to the south has wider implications than simply safeguarding the physical area of land that would be required for such a</p>	

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			<p>development. Specifically, the protection of the future runway (to the south) option has implications on the acceptability of noise sensitive development in nearby areas that might be subject to changes in exposure to aircraft noise outside the expanded airport boundary in the event an additional runway (to the south) was developed. GAL therefore strongly supports, as set out in the policy wording of GAT2 Option 1 and para 10.23 of the supporting text, the need for the consideration of future noise impacts associated with a potential additional runway to the south of the airport.</p> <p><b>GAL Response to Policy GAT 2: Safeguarded Land</b></p> <p>GAL <b>fully supports</b> the proposed Policy GAT2 Option 1 – safeguarding for future runway growth and associated supporting text in para 10.16 – 10.19.</p> <p>GAL <b>strongly objects</b> to proposed Policy GAT2 Option 2 which proposes the deletion of the policy for safeguarding of land around the airport.</p> <p>GAL's support for GAT2 Option 1 includes a minor changes to the wording of the Policy to align it to the current adopted policy GAT2 (i.e. exclusion of temporary uses unless these are small scale) and the additional statement that the future noise impacts associated with a possible additional runway on safeguarded land will be taken into account in planning decisions in the borough. The latter will ensure that future users of new development are not exposed to unacceptable levels of noise from aircraft.</p> <p>The draft Policy GAT2 goes on to broadly identify 'small works' that may be permitted within the safeguarded area. Whilst GAL supports the policy, GAL considers it would nevertheless be helpful if the supporting text for the policy were to provide greater clarity on those uses and types of development that would be considered 'small</p>	

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			<p>works' and therefore compatible with future development, and those which would not.</p> <p>GAL supports the exclusion of temporary consent for proposed development within the safeguarded land on the basis that the existence of new development in the safeguarded area would not be sustainable development in view of the need for the need for its subsequent removal, and would add materially to the complexity and challenges that come with bringing forward nationally significant infrastructure. These added challenges would include matters such as:</p> <ul style="list-style-type: none"> <li>i. The need to access the site and carry out survey work;</li> <li>ii. The added risk to the acquisition of the land quickly by agreement. Difficulties could arise where a temporary permission has expired but the operation of the development has not ceased and lengthy enforcement action by the Council is required which would significantly add to the costs and timeframe of the land becoming vacant for airport development;</li> <li>iii. The risk that the land would be left in a developed or even degraded state from a vacated temporary use. This would add to the costs and timeframe for the land being ready for future airport growth.</li> </ul> <p>Furthermore, GAL does not consider it is appropriate to grant a temporary planning permission in the safeguarded area in the light of the sustainability implications of permitting a development involving costly building works for its implementation and then, a few years later, for its complete removal.</p> <p>The matters associated with temporary consents in the safeguarded area clearly highlight how a temporary consent in the safeguarded land should be excluded. Temporary permissions could add to the</p>	

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			<p>complexity, cost and timescale for efficiently and speedily preparing a Development Consent Order application, securing timely delivery and implementation, and subsequently bringing into operation nationally significant infrastructure which is in the public interest.</p> <p>The safeguarding of the area of land which would be required to develop the airport in the future also results in a need to safeguard both the associated existing and safeguarded extended <i>future aerodrome</i> from inappropriate development (i.e. technical aerodrome safeguarding in accordance with the provisions of The Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002. GAL believes that the specific Aerodrome Safeguarding Policy CD7 should be referenced in the GAT2 Policy text as its inclusion would be more appropriate than within the proposed supporting text of para 10.25 of the draft Plan.</p> <p><b>Reasoned Justification - Paragraphs 10.17 to 10.25</b></p> <p>Paragraph 10.17 – GAL considers this text correctly identifies the requirement for safeguarding and the need to protect the land against incompatible development. In addition, it should also be noted that it would be contrary to the principles of sustainable development to allow development which may then need to be removed to facilitate a second runway.</p> <p>Paragraph 10.18 – GAL believes this paragraph needs to be updated.</p> <p>The text below sets out how Paragraph 10.18 should be reworded including text to be deleted as <del>strike through</del> and new text to be inserted in <i>italics</i>.</p> <p>10.18 The land shown as safeguarded for a second runway on the Local Plan Map 2015 reflects that shown in the 2012 Gatwick</p>	

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			<p>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 <i>2019 identifies</i> a slightly different area for <i>the safeguarded land</i>, following further work it has undertaken on growth plans. The Master Plan <i>2019</i> requests that the land continues to be safeguarded, and that <i>the current local plan boundary be revised to reflect</i> the land identified in the <i>2019</i> draft Master Plan.</p> <p>Paragraph 10.19 – Current Government aviation policy in the form of the Aviation Policy Framework 2013 clearly identifies that the land should be safeguarded and until such time as this policy becomes overtaken, then the land should continue to be safeguarded in the national interest. Importantly the Airports Commission Final Report (2016) recognised that Gatwick’s second runway proposal offered a credible and viable alternative to Heathrow in meeting demand for air travel.</p> <p>Paragraph 10.20 – GAL firmly believe the Council has robust evidence in the form of up to date and current government guidance to retain the safeguarding of land for the future development of a wide spaced runway to the south of the existing airport boundary.</p> <p>Paragraph 10.21 – GAL strongly believe that any planning applications brought forward for locations which fall in the safeguarded land area would be contrary to national policy and would indeed be premature.</p> <p>Paragraph 10.22 - GAL do not consider that it is appropriate for this Local Plan Review to consider the removal of the policy for safeguarding of land. The safeguarded land is a requirement of current national policy. GAL therefore agree with the final sentence of Paragraph 10.22.</p>	

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			<p>Paragraph 10.23 - GAL agree with the supporting text of para 10.23. Where land is safeguarded for a potential future runway, the noise policy EP4 should ensure that new noise sensitive developments in the borough are not adversely impacted upon by the potential future noise from air traffic.</p> <p>Paragraph 10.24 - GAL strongly support para 10.24. Land at Gatwick should continue to be safeguarded, and Policy GAT2 of the Crawley Borough Local Plan 2030 will continue to be applicable to any applications in this area and until national policy directs otherwise.</p> <p>Paragraph 10.25 – The paragraph is incorrectly cross referenced – and should refer to Policy CD7 which covers Aerodrome Safeguarding.</p>	
REP174/617	Gatwick Airport Limited	Policy GAT3	<p><b>Long Term Gatwick Related Car Parking</b>  <b>Strategic Policy GAT3: Gatwick Airport Related Parking</b>  The draft plan contains 2 questions in relation to GAT3:</p> <p><b>Consultation Question - 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?</b></p> <p>GAL recognise that the provision of car parking on-airport is directly aligned with the objectives set out in the NPPF for managing patterns of growth and transport so as to limit the need to travel, reduce congestion and emissions, avoid and mitigate adverse effects of traffic, and to promote sustainable modes of transport.</p> <p>GAL consider that off airport car parking is contrary to the overarching objectives of further steps in achieving sustainability in that, for example, such off airport car parking facilities frequently result in double counting of road trips by the very fact that they are off site. The creation of new off airport car parking also inhibits</p>	Support for GAT3, (now GAT2) welcomed. The council considers the airport is the most sustainable location for airport-related parking, should it be justified in the context of proposals for achieving a sustainable approach to surface transport access to the airport.



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			<p>GAL's ability to achieve greater modal shift of passengers and staff towards the use of public transport.</p> <p>The airport has sufficient capacity for airport users to park on-airport as is demonstrated in the GAL Interim Car Parking Strategy (April 2017). The predicted future growth of passengers at Gatwick Airport and the 48% public transport mode share target can be achieved through a car parking provision on-airport, without prejudicing the current or future operational needs of the airport.</p> <p>Even assuming that the public transport mode share targets are fully met, as passenger numbers increase, there is a residual and increasing demand for parking for those passengers who choose to use the car. It is important that an attractive car parking offer is available on airport as a means of discouraging options the less sustainable car trips compared with park and fly, and generate extra surface access journeys, congestion and CO2 emissions.</p> <p>There is already substantial consumer choice and competition in the market through the current mix of on and off-airport parking. Gatwick also has plans in place to meet growth in demand – its Car Parking Strategy and 5 year Capital Plan include provision for up to an addition 9,500 spaces over the period to 2023. Capacity would be brought on stream to meet demand.</p> <p>The adopted Local Plan Policy GAT3 has been challenged at appeal and the Policy, along with the rationale underlying it, has consistently been upheld by Planning Inspectors rejecting appeals at a number of Public Inquiries. Policy GAT3 is also consistent with the policy approach to airport related car parking taken by neighbouring local authorities such as Reigate &amp; Bansted Borough Council and Tandridge District Council.</p>	

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			<p>It has been accepted at such appeals and examinations that the provision of on airport car parking is the most sustainable location with a number of advantages, compared to off airport locations including:</p> <ul style="list-style-type: none"> <li>i) On airport parking sites are more accessible from the strategic road network, are closer to passenger terminals and therefore inherently reduce distances travelled by airport passengers arriving by car</li> <li>ii) On airport parking reduces emissions and impacts on residential amenity;</li> <li>iii) On-airport parking provision contributes towards a Public Transport Levy which is used to promote and enhance walking, cycling and public transport</li> <li>iv) On airport parking is consistent with the GAL Public Transport Commitments.</li> </ul> <p>It is important that there is a continued coordinated approach by CBC and its neighbouring authorities to ensure future need for airport related parking is planned and provided in the most sustainable way. GAL recognise and support the fact that Policy GAT3 is deliberately drafted so as to be consistent with airport parking policies in the adopted and emerging plans of other authorities in the area around Gatwick Airport</p> <p>To conclude, GAL fully support the approach of the draft Plan for airport related car parking to be permitted at on airport locations through Policy GAT3 as is currently proposed and the control it places over any future airport-related car parking. GAL consider that the policy is clear and justified, effective and consistent with national policy.</p> <p><b>Consultation Question - 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</b></p>	

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			<p><b>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?</b></p> <p>The airport has sufficient capacity for airport users to park on-airport as is demonstrated in the GAL Car Parking Strategy. The predicted future growth of passengers at Gatwick Airport and the public transport mode share target can be achieved through a car parking provision on-airport, without prejudicing the current or future operational needs of the airport.</p> <p>GAL has a published Airport Surface Access Strategy (ASAS) – Access Gatwick (May 2018). This provides the strategy and vision for Gatwick’s transport connectivity to 2030, including airport passenger and staff car parking requirements. The ASAS contains strategic priorities to deliver key objectives for public transport modal share at the airport including achieving 48% public transport mode share for air passengers and staff travelling to the airport by 2022. Therefore, it is clearly evidenced that all airport related parking needs can be fully met on airport alongside driving upwards the modal share targets.</p> <p>Even assuming that the public transport mode share targets are fully met, as passenger numbers increase, there is a residual and increasing demand for parking for those passengers who choose to use the car. It is important that an attractive car parking offer is available on airport as a means of discouraging use of the less sustainable car parking options which can create double the amount of car trips compared with park and fly, generate extra surface access journeys, congestion and CO2 emissions.</p> <p>The draft Plan can best support sustainable access to the airport by maintaining the policy approach that airport parking only be provided on airport, alongside GAL’s ongoing leadership for on airport transport through its Airport Surface Access Strategy, Car</p>	

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			<p>Parking Strategies and its obligations and commitments in the overarching Section 106 Agreement. Through the latter, GAL is committed to “provide sufficient but no more on-airport public car parking spaces than necessary to achieve the public transport modal share target.” The GAL Car Parking Strategy also reflects this commitment.</p> <p>GAL believe that it is not only the airport operator who has the responsibility to ensure that access to the airport is made in the most sustainable way. The airport operator has the leadership role but relies on a range of other parties - airlines, businesses, transport operators, local authorities, and others to achieve this objective. These interested parties have become engaged together through the Airport Transport Forum</p> <p>GAL support draft Plan Policy GAT3 as it appropriately restricts all future new and replacement airport-related parking to within the airport boundary, demonstrating the continued need for a sustainable approach to surface transport access to the airport.</p> <p><b>Strategic Policy GAT3: Gatwick Airport Related Car Parking</b> GAL fully supports the wording and intent of Policy GAT3 as drafted.</p> <p>GAL supports this policy, including the minor changes to the policy to remove any uncertainty that all proposals for airport related parking should be on airport irrespective of a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport being established for an off airport site.</p> <p>GAL recognises that ‘on- airport’ car parking is also directly aligned with the objectives set out in the NPPF for managing patterns of growth and transport so as to limit the need to travel, reduce</p>	

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			<p>emissions of traffic and to further promote sustainable forms of transport.</p> <p><b>Reasoned Justification – Paragraphs 10.27 to 10.30</b>            GAL supports the reasoned justification set out in paragraphs 10.27 to 10.30 as proposed and the control it places over any future airport-related car parking. GAL considers that the policy is clear and justified, effective, and consistent with national policy. The draft Plan Policy GAT3 restricts all future new and replacement airport-related parking to within the airport boundary, therefore demonstrating the continued need for a sustainable approach to surface transport access to the airport.</p>	
REP174/618	Gatwick Airport Limited	Policy GAT4	<p><b>Employment Uses at Gatwick</b>  <b>Strategic Policy GAT4: Employment Uses at Gatwick</b>            The draft plan contains one question in relation to GAT4:</p> <p><b>Consultation Question - Given Crawley's limited available employment land supply, do you have any thoughts on this policy?</b>            GAL supports Policy GAT4 as drafted.</p> <p>Policy GAT4 in the draft Plan reflects the position promoted by the GAL to include scope for land and buildings within the airport boundary to be used for non-aviation related uses. GAL wholly supports the proposed GAT4 objectives, along with a requirement that ensures that the long term operation of the airport is not prejudiced.</p> <p>Gatwick has significant advantages as an employment location. The space is already an allocated employment area on the basis that it falls within the airport boundary. Such employment space offers a highly sustainable location with easy access to central London and Brighton and more locally via local, regional and national train and bus networks. These transport networks will be improved</p>	Support for GAT4 (now GAT3) welcomed. Policy amended to refer to land and floorspace needs of the airport as it expands, and to ensure no unacceptable impact on Main Employment Areas and town centres and employment areas beyond Crawley's boundaries, in response to other representations.

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			<p>significantly within the draft Plan period. New employment space is available and deliverable within the short term. Importantly its future is unaffected by either the operation of a single runway or potential future additional runway (to the south) scenario.</p> <p>GAL therefore supports Policy GAT4 in allowing non-airport related commercial developments to come forward within the defined airport boundary, provided that such development would not prejudice the current and future operational requirements of the airport, nor policy objectives for Crawley Town Centre and Manor Royal. The airport has the potential capacity to meet wider employment needs than just airport related employment. There may be a greater opportunity to not only to widen the range and nature of employment uses at the airport but to potentially assist with meeting CBC's needs to allocate additional employment space. The airport is a highly sustainable location for employment floorspace. The diversification and intensification of the employment uses at the airport would therefore potentially benefit the wider Borough.</p> <p>To conclude, GAL fully support policy GAT4 and the reasoned justification in paragraphs 10.32 and 10.33, and agree with the principle of allowing greater flexibility for existing uses, in order to make more efficient and diverse use of land. The suggested GAT4 policy will serve to achieve this priority and the objectives of other national and local policies. GAL support policy GAT4 due to the significant economic benefit that can be created by allowing non-airport related commercial development of land and buildings within the airport boundary, without impacting the operational requirements of the airport now or in the future. Any proposals that come forward under the suggested GAT4 policy will also be tested against other relevant policies in the Crawley Local Plan 2035 ensuring that any development that comes forward would be appropriate and sustainable.</p>	

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REP177/659	The Woodland Trust	Policy GAT2	<p><b>Gatwick Airport</b> Policy GAT2 – The policy should ensure that no areas of ancient woods and trees are included in this land safeguarded for future airport development. In particular, we are concerned that the proposed area includes the following ancient semi-natural woodlands (ANSW):</p> <ul style="list-style-type: none"> <li>– Rowley Wood ASNW (Grid reference: TQ2791939226)</li> <li>– Huntsgreen Wood ASNW (Grid reference: TQ2828540024)</li> <li>– Horleyland Wood ASNW (Grid reference: TQ2898240539)</li> <li>– Unnamed ASNW at TQ2955640750</li> <li>– Allen’s Wood ASNW (Grid reference: TQ3003540208).</li> </ul> <p>In addition, we are concerned about the proximity of the site to Black Corner Wood ASNW (Grid reference: TQ2996939934).</p>	GAT2 Policy replaced by the North Crawley Area Action Plan Policy, SD3. This refers to the need to protect important environmental assets, including ancient woodland. Policy G13 also protects ancient woodland and veteran trees.
REP177/670	The Woodland Trust	Policy GAT3	Policy GAT3 – We seek clarification of this policy to confirm that any future car parking provision within the airport site would not be allowed on areas of ancient woodland or veteran trees. Even if the runway itself may be argued to be “wholly exceptional” development, car parking is not.	Applications for car parking affecting ancient woodland would not be acceptable, under Policy G13.
REP179/676	Savills on behalf of the Wilky Group	Policy GAT2	<p><b>1.0 Introduction</b></p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG or Wilky), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. It relates to Chapter 10, Gatwick Airport, and in particular Policy GAT2 ‘Safeguarded Land’ in the draft Crawley Borough Local Plan, 2019 (DCBLP).</p> <p>1.2 TWG owns about 63.3 ha (149 acres) of land east of Gatwick Airport and north and south of the M23 spur road between Junctions 9 and 9a. The plan at <b>Appendix 1</b> shows the extent of the opportunity in the Gatwick/Crawley/Horley area, including Gatwick Green (59 ha). Wilky and Aberdeen Standard Investments are discussing how they can work together in respect of Wilky’s</p>	Support for the removal of safeguarding noted. The council does not consider the government’s draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough

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			<p>strategic landholding adjacent to Gatwick Airport to bring forward an integrated mixed use development and co-ordinated infrastructure solution. In the adopted Crawley Borough Local Plan 2015 (CBLP), the Wilky land south of the M23 spur road (about 47.3 ha / 117 acres) forms a small part of the 523 ha (1,292 acres) of land that is 'Safeguarded' for a second runway at Gatwick Airport: TWG's land is required for landside facilities. Consequently, the Council has been unable to allocate the land, and instead has designated it as part of an Area of Search for a Strategic Employment Location (SEL) under adopted Policy EC1 (Sustainable Economic Growth). The Council intends to select one or more SELs in the event there is no longer a case to safeguard land for the second runway. TWG's landholdings within the Area of Search make it a major stakeholder in relation to the future of the local economy and its continued and sustainable economic growth.</p> <p>1.3 The representation will address two of the four consultation questions set out on pages 113 and 118 of the DCBLP:</p> <ul style="list-style-type: none"> <li>• Should land south [and east] of Gatwick Airport continue to be Safeguarded for a potential future wide-spaced second runway?</li> <li>• Should the Local Plan 2035 continue to safeguard land for a future widespaced runway at Gatwick Airport, or not? Why do you think this?</li> </ul> <p>1.4 In summary, The Wilky Group's position is as follows: the 2015 policy on aviation and airports that supported safeguarding at Gatwick no longer prevails today; consequently, there is no longer an in-principle case for safeguarding land at Gatwick for a second runway. Policy GAT2 and its spatial representation on the Local Plan Map is not therefore sound in its current form when judged against the four tests contained in the NPPF (para 35). In the absence of a national policy to safeguard land at Gatwick and any</p>	<p>boundary if safeguarding remains in place.</p> <p>Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for development and infrastructure within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the</p>



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			<p>robust evidence from Gatwick Airport Ltd (GAL) to justify yet further safeguarding, the Council must plan to meet the long-standing unmet economic needs of its population by bringing forward land for a highly sustainable mixed-use employment area east of the Airport. In contrast with the notion of a new runway at Gatwick Airport, these economic needs are pressing, are acknowledged in current policy, and exist now. However, The Wilky Group notes that there may not have to be a binary choice between delivering economic growth on its strategic land or safeguarding land for a future runway scheme: it is possible that both may be achievable.</p> <p><b>2.0 Safeguarded Land – Policy GAT2</b></p> <p>2.1 There are two fundamental questions that need to be answered in order to respond to the consultation questions:</p> <ol style="list-style-type: none"> <li>1. Is safeguarding land under Policy GAT2 justified in principle in the context of the legal position or the national policy framework on aviation and airports?</li> <li>2. Has Gatwick Airport Limited (GAL) put forward ‘robust’ evidence in its Airport Master Plan1 (AMP) to support the extent and configuration of land that is ‘critical’ to accommodate infrastructure as required by national policy and the NPPF, such that this land should be safeguarded from prejudicial development?</li> </ol> <p>2.2 In summary, it is considered that whilst safeguarding land may have been justified in principle at the time the CBLP was examined and adopted, the national policy framework on aviation and airports has fundamentally changed such that continuing with safeguarding is no longer justified, particularly in the context of Crawley’s cumulative unmet need for economic infrastructure which threatens to undermine the soundness of the emerging plan. It was always recognised that safeguarding would need to be revisited if central</p>	AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.

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			<p>government decided that a new runway should be built at Heathrow and not Gatwick.</p> <p>2.3 It is also considered that GAL has failed to provide any robust evidence to underpin the extent and configuration of the safeguarded land east of the Airport in its Master Plan and hence national policy on when safeguarding may be justified has not been met and cannot be met. This representation sets out the evidence and rationale to support this case.</p> <p><b>Question 1 – justification for the principle of safeguarding The Past approach to Safeguarding</b></p> <p>2.4 Before reviewing the current aviation / airport policy framework, it is worth understanding the history of safeguarding at Gatwick Airport and the premise on which it was based. In the political and national policy context which prevailed at the time the Crawley Core Strategy (2007) and the CBLP (2015) were adopted, Government policy was that land should be safeguarded for additional runway capacity; this was embodied in Core Strategy Policy G2, which was superseded by Policy GAT2 in the adopted CBLP. A number of policy documents prevailed as outlined below.</p> <p>2.5 The now withdrawn PPG 13 Annex B (2001) contained no guidance on safeguarding, instead noting that for the purposes of determining planning applications and defining planning policy, LPAs should consider the extent development is related to the operation of the airport. It went on to define operational needs (e.g. terminals); related development (e.g. airport car parking), and less directly related development (e.g. hotels / offices) which should be justified by their relationship to airport related businesses and appropriate in scale relative to core airport uses.</p> <p>2.6 The now revoked Air Transport White Paper (ATWP, 2003) noted that if conditions attached to construction of a third runway at</p>	

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			<p>Heathrow could not be met, and as there was a strong case for a second runway at Gatwick after 2019, land should be safeguarded for this. The ATWP contained a plan that showed proposed Safeguarded Land at Gatwick extending east of Balcombe Road based on a second wide-spaced runway.</p> <p>2.7 The Guidance on the Preparation of Airport Master Plans (2004) contains guidance on safeguarding and remains extant. The guidance states that master plans should identify long-term land requirements for future airport development and whether these require changes to airport boundaries. Such additional land should be clearly identified to minimise long-term uncertainty and non-statutory blight.</p> <p>2.8 The above guidance and planning policy formed the backdrop to the identification of the Safeguarded Land in the Airport's Master Plans of 20052 and 20063. In turn, these informed the Safeguarded Land boundary in the Core Strategy (2007).</p> <p>2.9 Following adoption of the Core Strategy, the first iteration of the National Planning Policy Framework (NPPF, 2012) emerged, which required that the extent of any safeguarding should be justified by 'robust' evidence that sites or routes are 'critical' to providing the infrastructure (this remains unchanged in the current NPPF (2019)). This guidance was reiterated in the Aviation Policy Framework (APF - 2013), but critically this was qualified in the following way: <i>"land outside existing airports that may be required for airport development in the future needs to be protected against incompatible development until the Government has established any relevant policies and proposals in response to the findings of the Airports Commission, which is due to report in summer 2015"</i> (Savills emphasis). Paragraph 10.2 of the DCBLP, which purports to rely on the APF to justify continued safeguarding, fails to draw</p>	

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			<p>attention to this important qualification, which time limited the need for safeguarding to the release of Government policy on aviation. In effect, the need for safeguarding was retained whilst a policy vacuum existed. The policy vacuum has now been resolved with the release of the Airports National Policy Statement (ANPS), the 'Beyond the Horizons'(BtH)<sup>4</sup> document and the draft Aviation Strategy (AS)<sup>5</sup> – these approved the third runway at Heathrow and limited all other airport expansion to making the best use of existing runways. National policy does not identify a specific need for a further new major runway in the South East (much less at Gatwick itself) and does not identify any specific time when such a runway will be needed. Nor does it require land for any such hypothetical runway to be safeguarded.</p> <p>2.10 Whilst the NPPF embodied in planning policy the need to consider safeguarding land for future airport infrastructure previously contained in the ATWP, it did so with the prerequisites relating to 'robust' evidence and that such land was 'critical' to the provision. Subsequently, the APF reinforced the need for safeguarding, but only until the Government had released its final aviation policy in response to the findings of the Airports Commission. The CBLP (2015) was prepared in this context and at the time of its Examination, the Airports Commission had not reported, so the guidance in the APF and NPPF prevailed. The Inspector therefore confirmed that Policy GAT2 and the Safeguarded Land boundary were sound. The Safeguarded Land area is similar to that in the Core Strategy, but was adjusted to reflect the boundary shown in the 2012 Airport Master Plan.</p> <p>2.11 Based on this assessment of past national policy and guidance, it is accepted that, in principle, safeguarding land for the second runway at Gatwick remained a sound approach at that time until the future of aviation had been decided through the Airports</p>	

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			<p>Commission process. The previous national policy on aviation was therefore timelimited by the APF 2013; with the release of the Airports Commission final report in 2018 followed by the Airports National Policy Statement (ANPS, June 2018) and the BtH policy document, the policy changed.</p> <p><b>The Current policy basis for any Safeguarding</b></p> <p>2.12 The current national policy context for airport expansion is very different from that which prevailed at the time of the CBLP 2015. The Airports National Policy Statement (ANPS, June 2018) confirmed an additional runway at Heathrow Airport that fulfilled the future demand for air travel up to 2050.</p> <p>2.13 The ANPS was followed by a policy document on the future of UK aviation outwith Heathrow Airport ('Beyond the Horizons' - BtH)<sup>7</sup>. This policy re-states the approach to airport expansion contained in the 2013 APF, namely that airports should make the best use of their existing runways. Gatwick is in the process of giving effect to this new national policy by seeking consent to lift its flight cap and use its existing emergency runway as a second runway. The original policy and factual basis for safeguarding for an additional runway at Gatwick therefore no longer exists.</p> <p>2.14 With no national policy to safeguard land at Gatwick for a second runway, any safeguarding must be justified in the context of the general provisions relating to safeguarding land for infrastructure. These policy provisions require a robust case to be demonstrated to support the nature and extent of any safeguarding if the plan is to be found sound. In this regard, while the Government's UK Aviation Green Paper, known as the draft Aviation Strategy<sup>8</sup> (AS, 2018) notes that "<i>..it is prudent to continue with safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate</i></p>	

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			<p><i>developments do not hinder sustainable aviation growth” (para 3.66), it goes on to re-state the guidance in the NPPF and that this provides sufficient “guidance for local planning authorities to consider the future needs of airports and their associated surface access requirements, when developing local plans”.</i></p> <p>2.15 In the light of the Government’s decision to proceed with a third runway at Heathrow and limit expansion elsewhere to maximising the use of existing runways, the current policy pertaining to airport capacity and safeguarding land for future development at airports can be summarised as:</p> <ul style="list-style-type: none"> <li>• National policy contained in the ‘Beyond the Horizons’ document (2018) requires that outside Heathrow, airports should make the best use of existing runway infrastructure.</li> <li>• The December 2018 draft AS reaffirms that consideration of safeguarding for airports and their associated surface access requirements, is one for local planmaking authorities applying general, national policy in the NPPF. There is no specific, airport-related runway safeguarding policy at national level.</li> <li>• The NPPF 2019 clearly sets out that the application of a safeguarding planning policy is one that must be tested and justified by local planning authorities based on robust evidence which must clearly demonstrate what is critical to accommodate any infrastructure.</li> </ul> <p>2.16 It is therefore clear that circumstances have materially changed since the adoption of the current plan. There is no longer any policy requirement at a national level for the continued safeguarding of land for a second runway at Gatwick Airport. The Government has taken the policy decision to develop the additional runway capacity needed up to 2050 at Heathrow. The reason for safeguarding land at Gatwick given in the 2013 APF has now fallen away. As far as other airports like Gatwick are concerned,</p>	

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			<p>Government policy is to support additional capacity based on their existing runway infrastructure. This does not require any safeguarding of land at Gatwick. Under these circumstances, retaining safeguarding under Policy GAT3 would be anachronistic, and carrying the safeguarding through without re-examining the matter at a local level would breach the requirements of national policy in the draft AS and the NPPF.</p> <p>2.17 Based on Government policy, there is presently no established need for a further new runway, nor any established policy that future needs should be met by further runway development. In the context of the current climate emergency – which casts doubt over the scale of additional runway capacity that could be accommodated in environmental terms – the future direction of aviation policy becomes more uncertain. Both current policy and the available evidence suggests that a second runway at Gatwick is likely to be a very long term proposition. Safeguarding under these circumstances is not tenable given that it would condemn land acknowledged in policy as being suitable and required for strategic employment to long term sterilisation. TWG's land has been sterilised for over 15 years – in the current aviation policy context, it would be wholly unreasonable to deny critical economic infrastructure and sterilise the land for 30 years up to 2035 and beyond.</p> <p>2.18 This uncertainty is starkly illustrated in the draft AS (paras 3.11-3.14) in relation to planning for further runway capacity. Para 3.13 indicates that any new framework for growth could accommodate additional runways beyond 2030 if the needs case could be proven (the Airports Commission concluded there was likely to be a demand case for a second additional runway by 2050 or possibly earlier, but not an environmental or commercial case (Airports Commission, Final Report, para 3.64). The Government</p>	

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			<p>therefore proposes to ask the National Infrastructure Commission (NIC) to include airport capacity in future national infrastructure assessments to determine whether there is a needs case for further runways. If a need is identified, the preferred location could be decided through (1) a National Infrastructure Commission (NIC) sector study, (2) an independent commission (like the Airports Commission), or (3) an aviation NPS to either set out the criteria any development consent application would need to meet, or by naming airport(s). The Government's preferred approach is an NPS to set out the criteria, but not name specific airports, so leaving it to industry to determine whether and when to bring forward proposals.</p> <p>2.19 In summary, it is considered that there is no longer a national aviation policy basis for safeguarding land at Gatwick Airport for a second runway. Government policy is focused on delivering the third runway at Heathrow and maximising the use of existing runways elsewhere. Consistent with this approach, the proposals for the expansion of Gatwick Airport contained in the Gatwick Airport Master Plan (2019)<sup>9</sup> are focused on expansion via the use of new technology to increase capacity based of the existing runway, and through the routine use of the standby runway for departures.</p> <p>2.20 The airport industry recognises this: in relation to a second runway at Gatwick, the GAL Master Plan acknowledges that such a proposal has no policy backing and as such <i>"Gatwick is no longer actively pursuing plans for an additional runway"</i> (Savills emphasis). In relation to safeguarding, the Master Plan states as follows (paras 5.4.10 and 5.4.11): <i>"As required by Government, land is currently safeguarded for the additional runway. We work constructively with Crawley Borough Council to ensure that, in this safeguarded area, development does not take place which would be incompatible with the additional runway. While we are not actively pursuing an</i></p>	



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			<p><i>additional runway at Gatwick we believe it is in the national interest to continue with this strategy of land safeguarding.”</i></p> <p>2.21 It should be noted that the first sentence in the above statement in GAL’s Master Plan is incorrect. The Government does not ‘require’ land to be safeguarded at Gatwick. The policy and guidance is generic relating to major airport / transport infrastructure, stating that it may be ‘prudent’ to continue with safeguarding where there is ‘robust’ evidence to safeguard only land that is ‘critical’ to that purpose. Ultimately, the AS places the responsibility on plan-making authorities to ‘consider’ the future needs of airports in the context of national policy on airport expansion. Absent any national policy to provide a new runway at Gatwick and any robust evidence from GAL on the need for safeguarding whether in principle or to the extent of the existing GAT2 policy, it is considered that the Council has no sound basis to include safeguarding in its Local Plan review.</p> <p><b>Crawley Borough Council’s position on safeguarding</b></p> <p>2.22 The evolution of CBC’s position on safeguarding since 2010 reveals that whilst it has paid heed to earlier Government aviation policy, it has aired its concerns over the impacts of safeguarding and justification for it in both principle and extent. This is set out in a number of planning Topic Papers on airport growth, and more recently from its position with regard to the draft Gatwick Master Plan 201810. The Topic papers can be summarised as follows:</p> <ul style="list-style-type: none"> <li>• <b>Topic Paper 9 (2010)</b> – Despite the Government’s decision (at that time) to proceed with expansion at Heathrow and Stansted, land must continue to be safeguarded for a second runway at Gatwick because this was policy in ATWP (2003) and because the South East Plan (Regional Spatial Strategy) had a policy requiring land to be safeguarded.</li> </ul>	

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			<p>• <b>Topic Paper 9 (2012)</b> – This noted that the Government was preparing a UK Framework on Aviation, but that in the meantime, the ATWP remained extant policy including safeguarding land at Gatwick Airport. However, the Topic Paper considered what the position might be in the context of the UK Framework on Aviation stating that <i>“It is felt that there needs to be discussion, if it is concluded that a second runway at Gatwick is not currently required, about whether it may be prudent to safeguard land on a very long term basis to retain it as a future option even if it is not needed now”</i>. The Council was clearly acknowledging that in the event that a second runway is not currently required, it would need to look closely at whether safeguarding land on a very long term basis was prudent.</p> <p>• <b>Topic Paper 1 (2014)</b> – This Topic Paper was issued following the publication of the APF in 2013 which contained generic advice on the need for safeguarding at airports and which also led to the revocation of the ATWP (containing the specific requirement to safeguard land at Gatwick), but in advance of the decision of the Airports Commission on runway capacity. The Paper put forward three scenarios (1) that a second runway is promoted by Government, (2) that a second runway is not supported and safeguarding at Gatwick is lifted, and (3) that a second runway is not supported, but that safeguarding at Gatwick should remain. Since 2017, the Government has rejected a second runway at Gatwick and has not sought to reinstate the ATWP policy that land at Gatwick should be safeguarded, instead re-stating the generic guidance on safeguarding at airports contained in the APF. This outcome is analogous to scenario 2 – accordingly, a second runway at Gatwick and Gatwick-specific safeguarding for such is not Government policy. On this basis, the Council’s position should be a presumption in favour of removing long term safeguarding from</p>	

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			<p>the DCBLP unless 'robust' evidence is provided by GAL as to the need to safeguard land and how in terms of its extent that land is 'critical' to such a need.</p> <p>2.23 The above outcome was reinforced by the Inspector at the CBLP Examination in 2015 in which he confirmed that land north of Manor Royal and east of the Airport were the preferred locations for strategic employment to complement the existing provision at Manor Royal and the Airport utilising established transport connections and infrastructure and that <i>"there is no realistic prospect of bringing this land forward in advance of the Government's decision on airport expansion"</i>. Now that that decision has been made in favour of a third runway at Heathrow and the expansion of other airports based on existing runways, there can be no basis for continuing to safeguard land in the very long term to 2035 and beyond, especially given the major adverse impacts of ongoing non-statutory blight and preventing the realisation of the subregion's economic and employment objectives.</p> <p>2.24 CBC's more recent corporate position unequivocally rejects safeguarding. A Full Council meeting on 12 December 2018 considered the Council's response to the draft Gatwick Airport Master Plan (2018)<sup>11</sup>. In relation to safeguarding, the report to Full Council noted its past objection (to the Airports Commission) to the second runway on environmental impact grounds, particularly noise and the pressure on housing supply. The report also notes that the Council objects to the second runway because the Borough has considerable unmet employment needs much of which could be accommodated within the safeguarded area of 523 ha. The report went on to recommend that the Council only supports the future safeguarding if directed to do so by the Government in the forthcoming Aviation Strategy.</p>	

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			<p>2.25 The DCBLP states that the Council were hoping that the draft AS would provide certainty on whether land at Gatwick needed to be safeguarded. The draft AS has not provided any certainty, and is not likely to. However, in the absence of any 'direction' by the Government, or any national policy requiring land at Gatwick to be safeguarded, the case to safeguard land falls away. On this point, the Council's report states that: <i>"If the Aviation Strategy does not provide clarity on this point, and the council does not safeguard land in its new Local Plan, the issue could become a key point of debate at the Local Plan Examination, and ultimately it will be for the Planning Inspectorate to determine. Prior to that, the council will seek to engage with GAL, the DfT and PINS."</i></p> <p>2.26 The Council clearly considered that in the present circumstances land should not be safeguard for a second runway, and the matter could then be debated at the DCBLP Examination.</p> <p>2.27 It is noted from the minutes of the Full Council meeting that Members spoke of the need for CBC to "take back" safeguarded land for strategic development and also of the importance of diversification within the existing employment offering. The Council resolved that it <i>"strongly disagrees that the land be safeguarded for the future construction of an additional runway"</i> consistent with its previous corporate position. National policy now allows the Council to dispense with safeguarding in accordance with its corporate intention.</p> <p><b>Gatwick Airport Master Plan 2019</b></p> <p>2.28 GAL has issued its final Gatwick Airport Master Plan (GAMP, July 2019)<sup>12</sup>, which contains a short section on the need to safeguard land for a possible future second runway. The introduction sets out the underlying rationale for continuing with safeguarding (para 5.4.1): <i>"Gatwick is no longer actively pursuing</i></p>	

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			<p><i>plans for an additional runway, but there nevertheless remains the possibility of building and operating one in the future. Should this, or a future, Government decide to support an additional runway at Gatwick, we would be ready to take this forward with a view to seeking development consent. Should such policy support materialise, then it would be feasible to open the additional runway towards the end of the 5 to 15 year period. It is for this reason that we have included the additional runway in this draft master plan.”</i></p> <p>2.29 This illustrates the fragility of the case for safeguarding – GAL is no longer pursuing plans for a second runway; the prospect of a second runway is no more than a ‘possibility’; and bringing forward a proposal is dependent on a future decision by the Government. The draft AS confirms that such a decision is unlikely given the Government’s preference for allowing Airports to bring forward schemes based on criteria contained in a future NPS. The Airports Commission found that there was likely to be demand for an additional runway in the South East around 2050 and the draft AS stated that it could emerge after 2030: it is therefore unlikely that there will be demand for an additional runway in the South East until at least 2040, some years after the end date of the DCBLP. Even if such demand materialised, the environmental and economic cases were doubted by the Airports Commission, and without such justification, potential future demand alone – even if it materialised – would not justify safeguarding.</p> <p>2.30 The GAMP goes on to state that land is safeguarded for a second runway as “<i>required by Government</i>” (para 5.4.10). As noted in this representation, there is no such requirement in national policy or guidance in relation to Gatwick Airport. No justification for safeguarding exists, and no explanation has been given as to why the extent of land proposed for safeguarding by</p>	

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			<p>GAL should be the same as it was before the Heathrow decision was made.</p> <p>2.31 It is worth noting that the GAMP proposes to bring forward the regular use of the standby emergency runway, which in effect is a second runway. A legal agreement in 1979 with West Sussex County Council (WSCC) prevented a second runway being promoted until 2019 – that GAL has brought forward its plans for the use of the standby runway now the time limit has expired, points to the proposal being a second runway for the Airport. That would effectively make the safeguarded land in the CBLP land related to a third runway, adding weight to the case that the safeguarding is not justified and is a total anachronism.</p> <p>2.32 The short section on safeguarding in the GAMP provides scant evidence. No evidence based rationale to underpin the extent of the land area for safeguarding has been provided in the GAMP. There is no acknowledgement of the Council's current, pressing and ever growing economic needs, and no explanation for how these have been taken into account in drawing the proposed boundary of the safeguarded land. The section in the Master Plan on safeguarding offers no clear evidence to support the extent of safeguarding and falls significantly short of meeting the tests relating to 'robust' and 'critical' evidence required by the NPPF.</p> <p><b>Conclusions on the need for Safeguarding</b></p> <p>2.33 In summary, it is considered that there is no longer a basis for safeguarding land at Gatwick Airport for a second runway. Government policy is focused on delivering the third runway at Heathrow and maximising the use of existing runways elsewhere; there is no longer any policy or guidance to specifically safeguard land at Gatwick Airport for a second runway; CBC's assessment of the planning policy response to different scenarios points towards rejecting ongoing safeguarding, and CBC's corporate position is to</p>	

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			<p>reject ongoing safeguarding and instead to address its critical unmet economic and employment needs within the Safeguarded Land.</p> <p><b>Question 2 – ‘robust’ evidence for Safeguarding for ‘critical’ infrastructure</b></p> <p>2.34 In the context of the policy and guidance contained in the APF, the NPPF and the draft AS, the need for any land to be safeguarded must be tested through the plan-making process. The evidence for safeguarding land must be ‘robust’ and demonstrate that it extends only so far as to accommodate infrastructure that is ‘critical’ in this case to a second runway.</p> <p>2.35 CBC is therefore required to scrutinise and test the robustness of any evidence relating to continued safeguarding, including (but not limited to) the extent of any proposed safeguarding boundary. GAL can no longer rely on Government aviation policy so it must put forward the evidence to justify any safeguarding both in principle and in detail against the tests in the APF and the NPPF. Competing needs for the land in question must also be considered. Robust evidence would also need to include (for example) evidence to support safeguarding land east of Gatwick (east of Balcombe Road) for landside surface car parking, notwithstanding that the Airport’s current Master Plan focuses on providing decked parking (6,065 spaces) for which far less land would be required.</p> <p>2.36 An assessment of past and current evidence to justify the extent of safeguarding reveals that this has consistently been based on a land use framework approach with very limited design work behind it, particularly in relation to the land needed for ancillary landside facilities.</p> <p><b>Past evidence on the extent of safeguarding</b></p> <p>2.37 Since the mid 2000s, GAL has consistently adopted a very high-level and broad-brush approach to identifying the extent of</p>	

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			<p>land needed for landside facilities east of Gatwick – this work has never clearly set out the precise future need for ancillary car parking and other transport facilities and the land areas to accommodate that need based on a sustainable and resource-efficient layout.</p> <p>2.38 BAA wrote to Savills in 2006 and 2007 (<b>Appendix 2</b>), providing some broad information on the considerations applied to determine the extent of the Safeguarded Land. It was noted by BAA that it was too early to establish the longer term land requirements in detail and it was said that such an approach was consistent with the Guidance on the Preparation of Airport Master Plans<sup>13</sup> (para 9.1 – states that less detail is needed for longer term plans for the period 2016 – 2030).</p> <p>2.39 On this basis, the approach taken in the mid 2000s through the Outline Master Plan (OMP, 2005) / Interim Mater Plan (IMP, 2006) was likely a precautionary one. The airport operator made some high level assessments of the maximum forecast of future parking requirements and used that to assess the land-take based on surface at-grade car parking, which was then reflected in the extent of the Safeguarded Land. The available evidence points to an approach whereby the Safeguarded Land area for landside uses was sufficient to accommodate the worst case scenario parking requirement: GAL’s position is that the precise land area would not be determinable until nearer the time when the airport expansion was needed and more robust projections were available to inform detailed design work.</p> <p>2.40 The airport operator’s approach in its draft IMP (2006) was reflected by CBC in its letter of 2007 (<b>Appendix 3</b>) in which it described the Safeguarded Land as a ‘worst case scenario’ of land needed to accommodate uses associated with the second runway. The shift in the extent of Safeguarded Land over this period illustrates the level of uncertainty in the airport operator’s plans.</p>	



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			<p>2.41 The IMP was finalised in 2012 as The Gatwick Airport Master Plan (July 2012)<sup>14</sup>. It confirmed that the area for landside facilities east of the railway would need to be substantially expanded to accommodate a transport interchange (including areas for coach parking and car rental), car parks and front line ancillary facilities such as offices and hotels. The land between the M23 and the Balcombe Road (TWG's land) might also be required for new road connections to the third terminal and other facilities, for the realignment of local roads (A23) and of opportunities for the provision of relocation sites for businesses whose premises would be lost as a result of the airport's development, or if they should be at risk of closure for want of suitable sites elsewhere in the locality.</p> <p>2.42 It is clear that GAL has previously identified a safeguarding area that is a 'worst case scenario' and that this was expanded over time as additional landside requirements were identified. Some of these landside uses including commercial offices were less directly related to the airport such that their inclusion as part of a safeguarded areas was questionable. This high-level approach was acknowledged by the Local Plan Inspectors when reporting on the Core Strategy (2007) and the adopted CBLP (2015).</p> <p>The key findings in this regard were as follows:</p> <ul style="list-style-type: none"> <li>• <b>CS 2007</b> – The Inspector concluded that whilst the list of landside uses / locations could be queried and that some of those uses may not be 'front-line' activities (offices, hotel and Petrol Filling Station), it was reasonable to take a flexible approach to create overall elbow room for airport expansion even if such activities are later excluded from the eventual strictly defined airport perimeter. The Inspector also conceded that some aspects of the alternative 'compact airport' approach outlined by Arup<sup>15</sup> could prove to have merit. The Inspector concluded that so as not to prejudice national airports</li> </ul>	

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			<p>policy, a soundly-defined safeguarded area must not take an excessively under-inclusive or prematurely restrictive approach.</p> <ul style="list-style-type: none"> <li>• <b>CBLP 2015</b> – The Inspector concluded that the surface parking identified on land east of Balcombe Road in the airport master plan may represent a suboptimal use of the land and that decking the parking could free up land for employment uses. Notwithstanding this, the Inspector considered that the area passed the ‘could be critical’ test in NPPF, and that there was no compelling evidence to suggest that it would not be required.</li> </ul> <p>2.43 The Inspector’s conclusions in 2007 were made before the issue of NPPF, so there was no need to scrutinise the evidence in the context of the ‘robust’ and ‘critical’ tests. Nevertheless, the acknowledgement that the Arup master plan showing how the expanded airport could be accommodated without utilising land east of Balcombe Road was considered to have merit.</p> <p>2.44 By 2015, the NPPF 2012 had been released, so the evidence was considered in the context of the ‘robust’ and ‘critical’ tests. Notwithstanding that the Inspector accepted the need for safeguarding and the area proposed by GAL, he concluded that the surface parking proposed east of Balcombe Road was a “<i>sub-optimal use</i>” of land and that decking the parking could free up land for employment uses. The evidence put forward by GAL was as high-level and broad-brush as that put forward in 2007 and provided little confidence that GAL had at any stage up to 2015 undertaken the level of work necessary to identify the precise land requirements for the second runway landside facilities. Indeed, two Inspectors have cast doubt on the approach taken by GAL noting that the list of landside uses / locations could be queried; the area east of Balcombe Road was a sub-optimal use of land, and that decking the car parking could free up land for employment uses.</p>	

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			<p><b>Current evidence on the extent of safeguarding</b></p> <p>2.45 In the context of national aviation policy that no longer requires land to be safeguarded at Gatwick for a second runway, the case for any future safeguarding, and for its extent, must be made afresh by the airport operator in order to meet the requirements of the NPPF. The Gatwick Airport Master Plan 2019 (GAMP) contains the only available evidence in this new policy context. The GAMP contains only a short section on safeguarding land for an additional runway. This sets out a very high-level summary of the traffic, capital investment, surface access, safeguarding and community/environmental considerations and a plan (Plan 20) showing a broad disposition of land uses within a slightly modified safeguarded area. Plan 20 shows the land controlled by TWG as exclusively for surface car parking. It is of great significance that the text and plan show no more background or technical justification for the land use disposition than that contained in previous airport master plans (2005, 2006 and 2012) or GAL's evidence to the Airports Commission.</p> <p>2.46 Critically, the GAMP does not address the material shortcomings in the airport master plans identified by the Inspectors in 2007 and 2015 and exposed by evidence put forward by Savills and Arup on behalf of TWG. Accordingly, there is an absence of any testing of alternatives to surface level parking east of Balcombe Road, an essential element of whether a policy can be found sound against the NPPF tests.</p> <p>2.47 Of particular note is that the GAMP significantly relies on the conversion of existing surface car parks to decked parking in order to accommodate demand over the next 5 years (6,065 out of 9,565 spaces, or 63%) and to some extent over the next 5 – 15 years (maximum use of single runway and standby runway). However, it inconsistently reverts to an all surface parking solution for the</p>	

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			<p>second runway expansion proposals by showing about 92 ha (227 acres) of land for surface parking east of Balcombe Road: this is shown on Plan 20, which notably excludes uses previously identified for this area and considered to be less directly related development (e.g. hotels, offices, leisure, retail) and only justified where there is a strong functional link to the operation of the airport and the uses are subordinate to it.</p> <p>2.48 Given the absence of any policy requirement to safeguard land at Gatwick for a second runway and the 'robust' evidence and 'critical' tests contained in the NPPF, the burden or proof lies with GAL to demonstrate why any Safeguarded Land is needed and if it were justified, why it should extend over any land east of Balcombe Road. The GAMP contains no such evidence: it appears to proceed as though the past position justified the future, whereas circumstances have now drastically changed compared to the past. It is considered that there is no sound basis to safeguard the land east of Balcombe Road in the Local Plan review.</p> <p><b>CBC's approach to policy</b></p> <p>2.49 It is considered that continued safeguarding of land for a notional second runway development cannot robustly outweigh CBC's duties as a plan-making authority to plan for sustainable growth. As part of this process, CBC will need to balance the strategic employment needs of the Borough (and neighbouring authorities), against safeguarding land for a future (as yet unplanned) second runway in the context of the current policy on aviation and infrastructure provision. Retaining safeguarding would result in continued long-term sterilisation of 523 ha of land which has been identified as an Area of Search for Strategic Employment Locations since 2015.</p> <p>2.50 Crawley Borough has limited options for accommodating employment development, so there are competing land use needs</p>	

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			<p>that must be addressed. The shortfall in Crawley's employment land supply has increased from 35 ha in the adopted CBLP 2015 to c 46ha in the DCBLP 2019 – this is considered to be a baseline shortfall given the limitations of the Council's Economic Growth Assessment referred to in separate representations on Policy EC1. Collectively, the various economic studies suggest a significant need for strategic employment land near to Crawley/Gatwick – this unmet need has been growing since 2012 and is now an urgent requirement for which the Council must plan. It is at least 46 ha and evidence suggests that this is a minimum. Of the land within the Area of Search (AoS), only the land at Gatwick Green has the high level of accessibility and potential for quality connectivity that a highly sustainable employment-led mixed-use urban quarter requires.</p> <p>2.51 The NPPF provides national policy on the approach to be taken by plan-making authorities in providing for strategic land use needs. At paragraph 20, it notes that strategic policies should make sufficient provision for <i>inter alia</i> housing, employment and commercial uses; infrastructure for transport; community facilities, and the conservation and enhancement of the natural, built and historic environments. CBC is faced with competing claims on its strategic employment land: on the one hand, GAL seek a safeguarding policy to extend to an indeterminate time in the future, just in case national policy changes, and environmental, economic and demand-related factors change, so as to justify a further runway at Gatwick. On the other hand, there is already a shortfall in economic land availability and a growing and pressing need that can be met sustainably on the safeguarded land. In contrast with the position on safeguarding, the case for further economic development is well documented and sound. The Inspector's report on the CBLP 2015 acknowledged that there was an unmet</p>	

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			<p>employment land need of at least 35 ha, which equates to a need for one or more strategic employment sites. That unmet need has now expanded to at least 46 ha of land. The need for strategic employment land is therefore immediate and growing.</p> <p>2.52 There is an obligation on plan-making authorities to plan positively for sustainable housing and economic growth. In contrast, the national policy on safeguarding land for infrastructure is more measured. When deciding on whether to identify Safeguarded Land for long term airport expansion, the NPPF contains general guidance at paragraph 104(c), which states that planning policies should: "<i>(c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;</i>"</p> <p>2.53 The above tests are particularly important for the future of Crawley given the conflict between providing for unmet employment needs and safeguarding land for airport infrastructure. The NPPF is clear that the question of whether safeguarding policies should be included in a Local Plan is, in the first instance, a matter for the local planmaking authority to consider and justify. In coming to any decision on whether to include a draft policy which safeguards land for transport, a local plan-making authority must have regard to the robustness of any evidence put forward in support of the proposed policy. In the context of the Local Plan review, CBC must consider the need for and extent of safeguarding in the context of the robustness of the evidence put forward by GAL for its continuation.</p> <p>2.54 As part of the Local Plan review, CBC must also balance the strategic socio-economic needs of the Borough (and neighbouring authorities) against safeguarding land for future (as yet unplanned) Gatwick Airport expansion in the context of the current policy to expand Heathrow and maximise existing runway infrastructure</p>	

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			<p>elsewhere. GAL's evidence for retaining the Safeguarded Land and its extent must be robust and compelling in the context of national policy on aviation. CBC's choice of policy approach is therefore critical given that retaining safeguarding would result in the continued and long-term sterilisation of 523 ha of land the use of which for strategic employment is acknowledged through the Area of Search for Strategic Employment Locations (SELS) in the adopted CBLP and given the Council's currently identified shortfall of up to 46 ha of employment land.</p> <p>2.55 The detrimental impacts of this sterilisation on (i) the economic growth prospects of the Borough; (ii) on the diversity of the employment offering, and (iii) on the landowners who have been affected by blight for the last 15 years, have been significant over this period. Extending these impacts indefinitely into the future would require robust evidence both as to the principle of safeguarding and its extent. Robust evidence would also need to include evidence to support safeguarding land east of Gatwick for landside surface car parking, given that the Airport's current Master Plan proposes decked parking over the short / medium term, for which far less land would be required.</p> <p>2.56 These detrimental impacts were accepted when national policy required, in the public interest, that various options for airport expansion in the South East should not be compromised, pending the Government's decision on the preferred location for an additional runway. Following the release of the Airport's NPS, the BtH policy and the draft AS, this requirement no longer applies so there is no robust national or local planning basis for unchanged and continued safeguarding under Policy GAT2. This is especially so when also weighed against the shortfall in strategic employment land within the Borough.</p>	

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			<p>2.57 The DCBLP contains two options with regard to Safeguarded Land, to retain it or to remove it. At this stage, it is not clear that CBC has effectively engaged with GAL as a transport infrastructure provider in accordance with paragraphs 16(c) and 104(b) of the NPPF, or met its Duty to Cooperate (DtC) with regard to the engagement with its neighbours that must be effective, constructive, ongoing, robust and comprehensive. An example of the lack of effective and comprehensive engagement is that CBC did not include Reigate &amp; Banstead and possibly its neighbours within Surrey in its North West Sussex Economic Growth Assessment (EGA) as part of a joint study covering the heart of the Gatwick Diamond, i.e. the greater Crawley/Gatwick area.</p> <p>2.58 In preparing and producing its evidence base for the Local Plan review, CBC will also need to satisfy its statutory duty under section 19 of the Planning and Compulsory Purchase Act 2004 - this requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a Local Plan during its preparation. One of the requirements of the Strategic Environmental Assessment (SEA) Regulations is to include an assessment of any reasonable alternatives, taking into account the objectives and the geographical extent of the plan or programme. Based on the evidence available, it is difficult to see how CBC could justify though its SEA16 the retention of safeguarding at Gatwick given the absence of an aviation policy imperative and any robust evidence from GAL in that regard.</p> <p>2.59 The SEA contains an assessment of two policy options for safeguarding namely (1) to retain safeguarding, or (2) to remove safeguarding. The analysis (which doesn't take account of the impacts from a second runway) concludes that safeguarding should be retained, but offers little insight into the rationale for this choice. When the two policy option evaluations are compared (absent the</p>	



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			<p>effects of a second runway), it is clear that removing safeguarding has less negative and more positive effects in contrast with retaining safeguarding. It is therefore unclear why the SEA concluded that safeguarding should be retained when the evidence points in the opposite direction.</p> <p>2.60 The DCBLP and the SEA contain a binary choice between safeguarding and no safeguarding. However, there is a third option, which has been referenced in this representation. This option can be characterised as safeguarding for a lesser extent of land for essential operational infrastructure associated with a second runway. This option could exclude land east of Balcombe Road from the safeguarded area given that it is earmarked in the GAMP for surface car parking and in the past for land uses less directly related to the airport. There are two reasons surface car parking may not be appropriate or justified – decked parking would reduce the amount of land needed and the climate emergency is likely to accelerate the shift towards alternative modes of surface access, so negating the need for surface parking in this area. It should be noted that under this third option, the land south of the airport is shown for essential operational uses in the GAMP, so would remain safeguarded. The third option offers the prospect of retaining, <b>if justified by robust evidence</b>, the option of a second runway and delivering much needed economic growth and infrastructure through the allocation of Gatwick Green as a Strategic Employment Location (SEL) within the identified Area of Search.</p> <p>2.61 The Gatwick Green site is free of any statutory national environmental designations and benefits from a strategic and highly sustainable location, with the ability to connect with national transport networks (airport, mainline rail and SRN) and be served</p>	

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			<p>by and expand local sustainable transport networks (Fastway, local bus services, cycle ways and footpaths).</p> <p>2.62 In summary, it is considered that there is currently no robust evidence in the DCBLP, the SEA or in the Gatwick Airport Master Plan 2019 to justify safeguarding land for the second runway, or specifically to justify any safeguarding of land east of Balcombe Road for surface car parking. This strongly indicates that in reconciling the needs of the economy with the uncertain and unsubstantiated long term aspirations of the Airport to develop a second runway, the needs of the economy should prevail.</p> <p>2.63 It is a concern that there appears to be a lack of effective engagement with GAL and the neighbouring Local Planning Authorities in Surrey over safeguarding and the wider sub-regional needs of the economy. Such engagement should have explored the options for accommodating safeguarding alongside economic growth at a sub-regional level. Such investigations could have identified a third option through a rigorous examination of GAL's evidence and through the Council's SEA. This option has the potential to allow land to be safeguarded whilst enabling economic growth east of the Airport.</p> <p><b>3.0 Conclusions</b></p> <p>3.1 In principle, the past policy of safeguarding land for the second runway at Gatwick was a sound approach in the adopted Local Plan until such time as the future of aviation had been decided through the Airports Commission process. National policy is now clear, an additional runway is proposed at Heathrow Airport, other airports are to maximise the use of their existing runways, and there is no longer a specific policy to safeguard land at Gatwick Airport. In this context, it is considered that there is no longer any justification in-principle to safeguard land at Gatwick in the DCBLP.</p>	

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			<p>3.2 In 2007, the ATWP required land to be safeguarded at Gatwick, and in 2015 the decision on whether to expand Heathrow or Gatwick had yet to be made so safeguarding was confirmed. Nevertheless, the shortcomings in the Airport's evidence base on the extent of safeguarding were acknowledged by both planning Inspectors, providing an early indication that the high-level approach by GAL to safeguarding was inadequate. The same high-level approach has been taken in the latest Airport Master Plan and evidently fails the NPPF tests of robustness and criticality. Further, CBC does not support safeguarding at a corporate level, so reinforcing the need to remove policy GAT2 from the DCBLP.</p> <p>3.3 From a review of how GAL has identified the extent of safeguarding in the past and from its current approach in the Gatwick Airport Master Plan 2019, it is clear that the evidence relating to the extent of the Safeguarded Land is far from 'robust' and so does not identify what is 'critical' to accommodate the essential infrastructure needed. This relates not only to the proposed extent of surface car parking east of Balcombe Road, but also to the absence of any needs case or policy justification for a second runway at this location at all.</p> <p>3.4 Whether to include Safeguarded Land is a matter for the Local Planning Authority. CBC must reconcile the need to accommodate c 46 ha of employment land within the Area of Search with any robust evidence to safeguard land that is critical to providing the transport infrastructure. In the absence of any robust evidence, which is considered to be the case, CBC should not safeguard land any longer and instead meet its immediate economic and employment needs over the Plan periods. There is, however, a third</p>	

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			<p>option that involves a reduced safeguarded land area so as to free up land east of Balcombe Road for essential economic development: in this context, GAL's proposed surface car parking is not considered to be sustainable for resource management or sustainable transport reasons. This option would need to be tested by CBC based on evidence from GAL and against the NPPF tests and though the SEA.</p> <p>3.5 Based on the content of the DCBLP and the GAMP, the evidence for blanket safeguarding. The current choice before CC is to either plan for economic development and secure the benefits for the communities around the Airport, or safeguard land for air-transport benefits that have no basis in aviation policy. The socio-economic consequences of not addressing the long standing unmet economic needs of Crawley are significant and growing, including increased out-commuting, reduced high-quality employment opportunities, lost income expenditure and GVA and lost opportunities for more sustainable transport.</p> <p>3.6 GAL must bring forward the evidence to justify continued safeguarding, including consideration of a third option given the overwhelming need to deliver additional strategic employment east of Gatwick. The questions for CBC are can safeguarding be justified in principle and if so, why, how much and where. It is understood that CBC has not engaged with GAL over these questions or the detailed basis of its safeguarded area, nor has it met its DtC with regard to joint working with its neighbours within the Gatwick Diamond over safeguarding or the closely connected issue of meeting the critical and immediate sub-regional economic needs in this area.</p>	
<b>ECONOMIC GROWTH &amp; SOCIAL</b>	Savills on behalf of the Wilky Group	Policy GAT3	<p><b>1.0 Introduction</b></p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG or Wilky), which has a long-standing interest in the promotion</p>	Disagree. The council considers the airport is the most sustainable location for airport-related parking, should it be

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<b>MOBILITY: GATWICK AIRPORT</b>			<p>of strategic employment land within the Crawley Borough Council (CBC) area. It relates to Chapter 10, Gatwick Airport and in particular Policy GAT3 'Gatwick Airport Related Parking' in the draft Crawley Borough Local Plan, 2019 (DCBLP).</p> <p>1.2 TWG owns about 63.3 ha (149 acres) of land east of Gatwick Airport and north and south of the M23 spur road between Junctions 9 and 9a. The plan at <b>Appendix 1</b> shows the extent of the opportunity in the Gatwick/Crawley/Horley area, including Gatwick Green (59 ha). Wilky and Aberdeen Standard Investments are discussing how they can work together in respect of Wilky's strategic landholding adjacent to Gatwick Airport to bring forward an integrated mixed use development and coordinated infrastructure solution. In the adopted Crawley Borough Local Plan 2015 (CBLP), the land south of the M23 spur road (about 47.3 ha / 117 acres) forms a small part of the land that is 'Safeguarded' for a second runway at Gatwick Airport: TWG's land is required for landside facilities. It also falls within an Area of Search for a Strategic Employment Location (SEL) under adopted Policy EC1 (Sustainable Economic Growth). TWG's landholdings within the Area of Search make it a major stakeholder in relation to the future of the local economy and its continued and sustainable economic growth.</p> <p>1.3 The representation will address two of the four consultation questions set out on page 119 of the DCBLP:</p> <ul style="list-style-type: none"> <li>• 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 do you think it would be appropriate?</li> <li>• 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</li> </ul>	<p>justified in the context of proposals for achieving a sustainable approach to surface transport access to the airport. Therefore, Policy GAT3 (now GAT2) requires all new airport-related parking to be located on airport.</p>

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			<p>you agree that the airport operator has the responsibility to ensure that access to the airport is made in the most sustainable way?</p> <p>1.4 Evidence is put forward to demonstrate that the current policy to restrict car parking to on-airport locations is not sound and should be amended to provide for flexibility in future airport car parking provision. Whilst the Council has successfully defended Policy GAT3 at several appeals concerning proposals for airport car parking in off-airport locations, none of those proposals tested the underlying evidential justification for the policy. A review of the evidence and the Council's sustainability assessment of alternatives reveals that the current policy is not justified in the context of future transport sustainability. Consequently, Policy GAT3 is not considered to be sound in accordance with the four tests contained in the NPPF (para 35).</p> <p><b>2.0 Gatwick Airport Related Parking – Policy GAT3 On-airport / off-airport parking balance</b></p> <p>2.1 The Gatwick Airport Master Plan 2019<sup>1</sup> identifies the current split between on and off airport parking. Paragraph 2.3.30 records that there are 39,000 on-airport spaces and 21,196 off-airport spaces; over a third (35%) of all parking spaces are therefore offairport. There is no evidence in the DCBLP that the off-site airport car parking provision operating legitimately with panning permission is not providing suitable and sustainable long-stay car parking for the airport. Paragraph 10.28 of the DCBLP acknowledges the existence of these car parks.</p> <p>2.2 Car parking which lies outside the current boundary of the Airport is therefore a key part of the overall provision for those travelling by car to Gatwick. Whilst it may not all be optimally located, it illustrates that off-airport locations provide a significant amount of spaces and are likely to continue to do so in the future. A</p>	

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			<p>prudent policy should therefore provide for off-airport car parking in circumstances where there is a need that cannot be met on airport, or the need can be met in an equally or more sustainable location off-airport, and subject to other criteria (predominantly sustainability).</p> <p><b>Off-airport parking potential</b></p> <p>2.3 Notwithstanding TWG's position that the identification of Gatwick Green for surface car parking does not optimise the development potential of this land, Plan 22 in the Gatwick Airport Master Plan 2019 (<b>Appendix 2</b>) shows the land east of Balcombe Road as surface car parking associated with the second (or in light of GAL's recently announced proposals, in effect third) runway. It is assumed that GAL selected this land as it considered it to be suitable and in a sustainable location, (i.e. meeting the sustainability requirements of Policy GAT3). However, the identification of this future possible car parking area reveals an inherent inconsistency within policy. Under current circumstances, this area of car parking would be contrary to Policy GAT3 by being outside the airport boundary and by definition (though no acknowledged measure) having an unsustainable location. If the airport boundary is re-located, the proposed parking in this area would become on-airport and in a sustainable location. By the arbitrary re-location of the airport boundary, an area of car parking shown as a long term proposal in the Airport Master Plan becomes policy-compliant but is currently contrary to policy. This demonstrates the contradiction within Policy GAT3 and the lack of justification for its continued application – if land is suitable in principle for a particular use, then this should not be obstructed or prevented by an unnecessarily restrictive policy.</p> <p>2.4 A more flexible approach to airport car parking, analogous to that in the Luton or Uttlesford Local Plans would allow proposals to</p>	

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			<p>be put forward, where a need is demonstrated and alternative on-airport locations are not available. This might include land currently considered by GAL as suitable for airport car parking. In relation to the site east of Balcombe Road, there is potential for decked car parking within the Airport's runway Public Safety Zone (PSZ), so freeing up land for employment development and thus adopting a more sustainable and positive approach to economic development in the sub-region. This is wholly consistent with the land's identification within the Area of Search for a Strategic Employment Location. It is also in line with the findings of the Inspector at the 2015 Examination into the adopted CBLP who concluded that the surface parking identified on land east of Balcombe Road in the Airport Master Plan may represent a sub-optimal use of the land and that decking the parking could free up land for employment uses.</p> <p><b>Sustainability</b></p> <p>2.5 The SEA2 contains an assessment of two policy options for airport car parking, (1) to restrict parking to on-airport locations, and (2) to allow car parking in other areas. The analysis states that allowing parking in other locations would encourage access to the airport by car; would be less sustainable than on-airport parking; would detract from biodiversity and landscape values, and would place pressure on land that could have more beneficial uses. It is considered that none of these adverse impacts need necessarily apply because:</p> <p>1. The location of car parking on or off airport has no relationship to the proportion of people traveling to the airport by car. Passengers at long-stay car parks travel to/from the terminals by shuttle bus and this applies whether a site is on or off-airport. Only car parks located immediately adjacent to the terminals would avoid this transfer. The impacts of private car travel are proportionate to the</p>	



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			<p>distance travelled and the sooner in their journey the occupants transfer to more sustainable modes, the less the impact.</p> <p>2. No evidence is provided on why an off-airport location would be less sustainable than an on-airport location. If it relates to avoiding transfer by bus, then such transfers are likely to be necessary for most of GAL's proposed new on-airport car parks. The adoption of zero carbon buses or other transfer modes with negligible carbon impacts alters the balance of sustainability between on and off-airport locations. A case may easily be made to intercept private cars earlier in their journey to the airport to transfer occupants into zero carbon vehicles. This would reduce net carbon emissions resulting from surface transport. It may also release land for more productive and environmentally beneficial uses on or adjacent to the airport.</p> <p>3. Biodiversity and landscape values can be protected and enhanced by the application of other policies in the DCBLP, to which all proposals for off-airport parking proposals would be subject.</p> <p>4. Other beneficial uses are likely to be employment or housing – CBC is in a position to allocate sites for these purposes so avoiding their loss to airport car parking.</p> <p>2.6 Notwithstanding the findings of the SEA analysis, the two policy options have a potentially identical sustainability profile. Taking account of the above re-evaluation, it is considered that the SEA analysis would not show any sustainability benefits to onairport locations compared to suitably located off-airport sites. Indeed, it is possible that off-airport sites could offer clear sustainability benefits by the use of low/zero carbon transfer arrangement, so reducing</p>	

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			<p>carbon and pollutant emissions along approach routes to the Airport and at the Airport itself.</p> <p><b>The need for flexibility</b></p> <p>2.7 Policy GAT3 restricts airport car parking to on-airport locations in the context of proposals for achieving a sustainable approach to surface access to the airport. This approach pre-supposes that only locations on-airport represent suitable or sustainable locations for airport car parking. It also implicitly assumes that transfer from car-parks to the terminals will be undertaken with petrol/diesel powered buses. The use of electric or hydrogen propulsion will significantly alter the balance of carbon impacts so supporting more distant airport parking facilities.</p> <p>2.8 Aside from the ongoing debate over “sustainable” parking locations, there are many sites near or highly accessible to the Airport’s operational boundary which present the same profile in relation to sustainability as existing on-airport facilities. The key locational criterion should be having ease of access to the airport such that transfer services could access either terminal efficiently and with very minimal environmental impact.</p> <p>2.9 The DCBLP Sustainability Appraisal and Strategic Environmental Assessment (SEA)<sup>3</sup> notes at paragraph F15 that <i>“sites within the airport boundary are close to the terminals and can help reduce the number and length of trips”</i>. These outcomes could equally be secured by a site close to the airport boundary with good quality access to the airport via the principal highway network, utilising transfer vehicles with low or zero carbon emissions: in short, such sites are not exclusive to on-airport locations. This illustrates the overly restrictive nature of the policy which may serve to exacerbate rather than mitigate the surface transport impacts of travel to and from the Airport.</p>	

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			<p>2.10 Policy GAT3 fails to recognise that suitable and sustainable off-airport sites for car parking could make a valuable contribution to the overall supply of long stay parking at Gatwick Airport. A review of Local Plans affecting other major UK airports reveals that there are a number where there are no policies relating to the location of airport car parking (Heathrow, Manchester, East Midlands, Liverpool, Newcastle, Birmingham and Southampton). Those that do have policies typically adopt some flexibility in permitting off-airport car parking where a number of criteria can be met. Applying such criteria enables Local Planning Authorities to resist sites that are in unsustainable locations or would cause other adverse transport, planning or environmental effects. Examples of suitable policies include those in the adopted Luton Local Plan and the Submission Uttlesford Local Plan.</p> <p>2.11 Both policies contain a presumption in favour of on-airport locations, but also allow for off-airport locations where it can be demonstrated that there is a need that cannot be met on-airport and that the proposals comply with other environmental and transport requirements. Policy GAT3 is far more restrictive by only permitting sites that are on-airport and justified by need in the context of the sustainable approach to surface access transport at Gatwick Airport. Policy GAT3 is therefore inconsistent with planning policy and practice elsewhere, which offers a more balanced and appropriate approach. This recognises that circumstances could arise whereby an off-airport car park could be justified and would serve an important role in providing for the transport needs of passengers in a sustainable way.</p> <p>2.12 Based on these examples, a revised Policy GAT3 is proposed, that reflects an objective assessment of the sustainability profile of</p>	

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			<p>the alternative policy options. The policy is contained in <b>Appendix 3</b>.</p> <p><b>3.0 Conclusions</b></p> <p>3.1 It is considered that Policy GAT3 does not pass the tests of soundness contained in the NPPF at paragraph 35. This is because the policy:</p> <p>I. is <b>not positively prepared</b>, as it fails to provide flexibility to allow for some offairport car parking that may be required to meet legitimate needs and in a suitable location and consistent with the current on / off-airport parking profile;</p> <p>II. is <b>not justified</b>, as a re-assessment under the SEA shows that it is not the most appropriate strategy in sustainability terms when compared with the alternative of providing flexibility to allow for off-airport car parking;</p> <p>III. is <b>not the most effective strategy</b> in that it could become an unjustified constraint on the provision of sustainable off-airport car parking where on-airport options are not available, as provided for in other Local plans; and IV. is <b>not consistent with national policy</b> as it would prevent the development of sustainable car parking in off-airport locations, including on land east of Balcombe Road in line with the Gatwick Airport Master Plan 2019.</p> <p>3.2 A review of the sustainability assessment in the Council's SEA reveals that off-airport car parking has the potential to offer an equally, if not more, sustainable solution. From these findings, an alternative wording of Policy GAT3 is proposed at <b>Appendix 2</b>.</p>	
<b>CBC Response</b>	Tim North & Associates on behalf of		These representations have been prepared by Tim North & Associates Ltd and Williams Gallagher acting on behalf of Holiday Extras Ltd concerning the Draft Crawley Borough Local Plan 2020-2035.	Support for removal of safeguarding noted. The council does not consider the government's draft Aviation Strategy,

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	Holiday Extras		<p>Holiday Extras Ltd is the largest distributor of holiday related products, including long term on and off airport car parking, hotels and lounges, in the UK, whilst Airparks Services Ltd is an associated company providing airport related car parking to in excess of two million customers per year.</p> <p>These representations have been submitted to your Council to highlight a number of concerns expressed by my clients to the approach taken in the review of the adopted Local Plan. They should be seen as providing an opportunity for further discussion between those advising my client and your officers, prior to the publication of the Regulation 19 version of the Crawley Borough Local Plan 2020-2035.</p> <p><b>The Relationship between Safeguarded Land and Employment Land Provision</b></p> <p>The adopted Local Plan identified an employment land supply of 23ha to meet the short term economic growth needs of the town in the early years of the plan. The figure of 23ha fell short of the employment land trajectory figure of 58ha extending over the Local Plan period from 2015 to 2030, resulting in an identified shortfall of 35ha over the same time period. In examining the quantum of employment land identified in the employment land trajectory reveals that it was, and continues to be, highly reliant on sites situated on “<i>safeguarded land</i>” coming forward for employment development in the Borough; which at the time of preparation of the adopted Local Plan could not be regarded as being available until the final version of the Airports’ NPS had been released. In this respect, future employment land supply from “<i>safeguarded land</i>” during the period 2015 to 2030 amounted to 139.17ha, compared with a figure of 25.77ha from non “<i>safeguarded land</i>”.</p> <p>The 2019 Economic Growth Assessment has identified a figure of between 44.6 and 57.6ha comprising the amount of employment</p>	<p>Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place.</p> <p>Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the</p>

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			<p>land needed during the emerging Local Plan between 2020 and 2035. A total of only 13.19ha has been identified in the Borough to meet short term employment needs of the town in the early years of the Plan period, resulting in a considerable shortfall.</p> <p>It is understood that your Authority intends to explore in greater detail the ability of the Horley Business Park situated in the Borough of Reigate &amp; Banstead to meet your Council's unmet employment land needs. By itself, and coupled with reliance placed on the redevelopment and intensification of under-used sites in the Borough Council's administrative area, will not resolve this shortfall. Important in this regard is the loss of 61,500 sqm. of Class B1(a) commercial floorspace to residential development through permitted development rights.</p> <p>An area of search has been identified for additional employment land in your Council's jurisdiction, being commensurate with the <i>"safeguarded land"</i> lying to the north of Manor Royal and south east of London Gatwick Airport. It is said that this location would <i>"complement Manor Royal and build upon its existing scale and function and represent a sustainable use of land."</i></p> <p>Holiday Extras Ltd are in agreement with this assessment of the <i>"safeguarded land"</i>, but raise doubts on the ability of the Manor Royal Employment Area to continue to successfully perform its role as a strategic economic site, lying at the heart of the Gatwick Diamond comprising part of the Coast to Capital Enterprise Partnership. This employment site is critical to the economic function of the Borough and its wider sub-region.</p> <p><b>The Contribution Safeguarded Land Makes in Meeting Future Employment Needs</b></p> <p>It is the view of Holiday Extras Ltd that the opportunity should be taken through the emerging Local Plan process, to reduce the significant unmet employment land needs of the Council through</p>	<p>economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for development and infrastructure within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.</p>

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			<p>the release of the “<i>safeguarded land</i>” situated to the north of the Manor Royal Employment Area for future employment generating development, if the continued and increasing shortfall in employment land is not to be exacerbated in future years. This is a legitimate aim in the light of policy considerations relating to “<i>safeguarded land</i>” which have emerged since preparation of the Crawley Borough Local Plan 2015 to 2030.</p> <p>It is recognised that at the time the Crawley Borough Plan 2015 to 2030 was being prepared, your Authority was required to have regard to the Aviation Framework 2013, paragraph 5.9 of which is relevant when considering “<i>safeguarded land</i>”, viz:</p> <p><i>“5.9 Land outside existing airports that may be required for airport development in the future needs to be protected against incompatible development <b>until the Government has established any relevant policies and proposals in response to the findings of the Airports Commission, which is due to report in summer 2015.</b>”</i> (my emphasis)</p> <p>The Aviation Framework 2013 was published prior to the approval of the Airports NPS, and the decision taken by the Government to progress the Northwest Runway and associated infrastructure at London Heathrow Airport.</p> <p>The Inspector in his decision dismissing Holiday Extra Ltd’s appeal on 31<sup>st</sup> January 2019 seeking an extension to the permanent lawful long term off-airport car parking use on land adjoining the Lowfield Heath Service Station for a temporary period of five years, along with the provision of a new vehicular access and related infrastructure provision, recorded that uncertainty existed with the decision on the Airports NPS being “<i>highly controversial</i>” and subject to legal challenge. He stated that he saw little justification for departing from adopted Local Plan policy until the Council</p>	

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			<p>initiated a review of Policy GAT2 and a new policy framework existed at the airport.</p> <p><b>Policy Formulation Relating to Safeguarded Land</b> It follows that a review of the adopted Local Plan is the appropriate stage at which to undertake a review of Policy GAT2 concerning “<i>safeguarded land</i>”. It is important in this respect to examine those changes in the policy framework which will have an impact on “<i>safeguarded land</i>”.</p> <p>In the intervening period following the adoption of the Crawley Borough Local Plan 2015-2030 in December 2015, there have been two subsequent versions of the NPPF. The original version of the NPPF in force at the time of adoption of the Crawley Borough Local Plan 2015-2030 contained paragraph 33 which read as follows: “33. <i>When planning for ports, airports and airfields that are not subject to a separate national policy statement, plans should take account of their growth and role in serving business, leisure, training and emergency service needs. Plans should take account of this Framework, as well as the principles set out in the relevant national policy statements and the Government Framework for Aviation.</i>”</p> <p>Paragraph 33 of the original NPPF referred specifically to other relevant national policy, including the Government’s Framework for Aviation, published later in 2013 and known as the Aviation Policy Framework. Paragraph 33 has since been deleted, and replaced by paragraph 104c), in which it is said:- “104. <i>Planning policies should:...</i> c) <i>identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.</i>”</p>	



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			<p>Paragraph 104c) refers to the need for “<b>robust evidence</b>” in identifying and protecting sites which are “<b>critical</b>” in developing wider transport choice and realising opportunities for large scale developments. (my emphasis)</p> <p>The final version of the Airports NPS was published in June 2018, with the decision taken by Parliament on 25<sup>th</sup> June 2018 to accept the recommendations of the Davies Commission, and provide a new Northwest Runway and associated infrastructure at Heathrow Airport Ltd, to meet the needs of additional runway capacity in the South East of England. Subsequent legal challenges to the Airports NPS were all dismissed in the High Court in Spring of this year<sup>1</sup>, with GAL taking the decision to publish a Gatwick Airport Masterplan 2019, following a period of public consultation extending from 18 October 2018 to 10 January 2019 on a draft version of the same document.</p> <p>Meanwhile in December 2018, a Green Paper entitled “<i>Aviation 2050: The Future of Aviation</i>” was published by the Government for consultation purposes. Under the title “<i>A Partnership for Sustainable Growth</i>” forming part of Chapter 3 “<i>Ensure Aviation and Growth Are Sustainable</i>”, reference is made to the Government’s forecast that demand for aviation will continue to grow until 2050<sup>2</sup>, with support for other airports seeking to make “<i>best use of their existing runway capacity subject to economic and environmental issues being addressed.</i>”<sup>3</sup> It is said in the same chapter that the Government is supportive of growth that is sustainable, and will provide the necessary framework for this to happen. This will</p>	

<sup>1</sup> In July 2019 Plan B and Friends of the Earth were granted permission to appeal against the rejection of their challenges in the High Court to the Northwest Runway at London Heathrow Airport and the Airports NPS.

<sup>2</sup> Paragraph 3.5 of the Green Paper “*Aviation 2050 The Future of UK Aviation*” and Department of Transport “(2017): *UK Aviation Forecasts*”

<sup>3</sup> Paragraph 3.6 of the Green Paper “*Aviation 2050 The Future of UK Aviation*” and Department of Transport “(2018) *Making Best Use of Existing Runways*”

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			<p>require a partnership approach between Government, the regulator and “<i>industry, and other interested parties</i>” to ensure that necessary conditions are met in respect of infrastructure, community investment and environmental measures.<sup>4</sup></p> <p>This partnership for sustainable growth proposed by the Government is a long-term policy framework objective, which will need to be flexible enough to respond to new information, developments and changing circumstances, applying to all airports and airline operators in the UK, although many policies would need to be tailored to local circumstances. For example, there could be different policies applied depending on whether an airport was continuing to grow within existing planning approvals, was bringing forward a new planning application to make best use of existing runways, or in future was potentially seeking permission for a new runway. Until any framework is adopted as Government policy, planning applications should continue to be considered against existing policy.<sup>5</sup></p> <p>The same Green Paper stated that additional growth in passenger demand would lead to a number of airports experiencing passenger constraints. The Airports Commission noted that while there may be a demand case beyond 2030, there is not necessarily a corresponding environmental or commercial case.</p> <p>The Government is not at present at the point of making a decision on long term need, but based on current evidence believes that any new framework for growth could accommodate additional runways beyond 2030, <b>if a needs case is proven and suitable conditions are met in respect of sustainability</b>. The Government intends to ask the National Infrastructure Commission to include airport</p>	

<sup>4</sup> Paragraphs 3.7 & 3.8 of the Green Paper “*Aviation 2050 The Future of UK Aviation*”

<sup>5</sup> Paragraph 3.10 of the Green Paper “*Aviation 2050 The Future of UK Aviation*”

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			<p>capacity in future infrastructure assessments to determine whether there is a needs case for further runways. A variety of different options are then set out on how a decision on the location for additional runway capacity could be reached.<sup>6</sup></p> <p>The purpose of drawing this chronology of events in policy formulation affecting “<i>safeguarded land</i>”, is to highlight the fact that whilst there is clear support for airports to make best provision of existing runways, and Holiday Extras Ltd also support this proposal at London Gatwick Airport; no robust short or medium term need has been proven for an additional wide-spaced or third runway at London Gatwick Airport.</p> <p>It is clear that such a decision is likely to take place in the longer term, at a time when the employment land needs of your Authority are likely to have reached a point where the continued success of the Manor Royal Employment Area, vital to the local and wider economy, is likely to be seriously impeded.</p> <p>It is suggested that a detailed assessment be undertaken by your Authority and/or its retained consultants, in which the release of the “<i>safeguarded land</i>” to the north of the Manor Royal Employment Area is considered with the intention of meeting your Council’s current unmet employment needs.</p> <p>GAL have decided to utilise the existing standby runway to further increase passenger throughput by greater than 10mppa, necessitating a Development Consent Order (DCO) application being lodged with The Planning Inspectorate in accordance with the Planning Act 2008. There is no requirement to take up any “<i>safeguarded land</i>” situated to the north of the Manor Royal Employment Area and south east of London Gatwick Airport as part of this proposal. It is understood an additional 10 to 15 hourly</p>	

<sup>6</sup> Paragraphs 3.12 to 3.14 of the Green Paper “*Aviation 2050 The Future of UK Aviation*”

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			<p>aircraft movements in the peak hours would arise from the permanent use of the standby runway, with passenger throughput rising from 46mppa at present, to 70 million passengers by 2032. GAL have not abandoned any intention of providing what would be a further (third) wide-spaced runway, which would require using land in the same safeguarded area.</p> <p>It is Holiday Extras Ltd's opinion that notwithstanding the economic importance arising from the presence of London Gatwick Airport, this has to be tempered by the requirement to ensure that the significant unmet economic and housing needs of your Borough are not sacrificed by pursuing a policy where the first priority is given to meeting the commercial needs of London Gatwick Airport over and above all other considerations, since pursuing this approach would severely reduce the significance otherwise attributable to the independency of the plan-making process.</p> <p><b>Implications Arising from the Gatwick Airport Masterplan 2019</b></p> <p>It is acknowledged that adopting a stance of reducing the unmet employment land needs of your Council in the area of search/"safeguarded land" to the north of Manor Royal Employment Area and south east of London Gatwick Airport, cannot be seen in isolation and is required to be seen in context.</p> <p>What is meant by this is that your Authority faces a number of uncertainties regarding the proposed DCO application to be submitted by GAL concerning the permanent use of the standby runway. These uncertainties surround a host of issues having both positive and negative environmental, social and economic impacts. Important identifiable adverse impacts arise not only in regard to the ability to meet your Council's future unmet employment needs, but through the blighting of neighbouring properties and businesses as</p>	

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			<p>a consequence of increased noise and traffic related considerations.</p> <p>The Gatwick Airport Draft Masterplan Consultation Report reveals that these uncertainties are attributable to a number of topic areas which are to form part of assessments accompanying the DCO application for what is referred to as Scenario 2, i.e. permanent use of the standby runway. They include a Transport Assessment along with the preparation of a series of strategies and measures to support future surface access impacts from the same development; socio-economic assessments surrounding the extent of new employment generated from the new proposals, together with the impact mitigation and benefits associated with housing provision, including additional demands for health, education and infrastructure. Environmental factors surrounding measures to avoid food risk, heritage assets, green space, and waste management, to name a few, are all to form part of the EIA.</p> <p>These are all issues which to date your Council appears not to have any prior knowledge of, and where your Council has a limited input in the DCO application process. This situation has implications on the timetable of the Local Plan review, and why it is important that a parallel assessment surrounding the release of the “<i>safeguarded land</i>” to the north of the Manor Royal for employment generating development is necessary, if only to allow an informed comparison between the two projects from an overall sustainability appraisal perspective, seen in a local plan context. It would also require further consultation to allow members of the public and other interested parties to have an input into the two projects, since otherwise the Local Plan is being formulated within a vacuum, despite the presence of one of the largest airports in the world being within its administrative area.</p>	<p>Policy GAT1 continues to support the growth of the airport on a single runway and highlights the issues which the DCO process for the use of the northern runway should address. The Council, as with other neighbouring councils, is involved in the DCO process and is making representations to the Planning Inspectorate at the relevant times.</p>

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			The area of search for employment development situated to the north of Manor Royal Employment Area, or that proposed for future runway provision and associated infrastructure as part of a justification for the “ <i>safeguarded land</i> ” designation, is required to be assessed against a number of policies in the emerging Local Plan.	
	Tim North & Associates on behalf of Holiday Extras	Policy GAT2	<p>4. Policy GAT2 “Safeguarded Land”</p> <p>Your Council suggests that one of the two options surrounding Policy GAT2 “<i>Safeguarded Land</i>” is its possible deletion. The synopsis of policy formulation relating to “<i>safeguarded land</i>” since the preparation of the Crawley Borough Local Plan 2015-2030 indicates a loosening of the ties relating to such land, with the need for “<b>robust evidence</b>” in identifying and protecting sites which are “<b>critical</b>” in developing wider transport choice and realising opportunities for large scale developments. (my emphasis)</p> <p>There has been no further movement, nor is there likely to be on the accepted long term policy objective being promoted by the Government entitled “<i>The Partnership for Sustainable Growth</i>”. The Annual Monitoring Reports associated with the National Infrastructure Commission reveals that there have been no assessments to determine whether there is a needs case for further runways beyond 2030.</p> <p>This is occurring at a time when your Council is facing significant unmet housing and employment land needs. Adjoining Authorities in the same Housing Market Area have had to provide for housing to meet the requirements of your Authority in recently adopted Local Plans. The use of the standard method to quantify the housing requirements in those adjoining Authorities in the future will result in even further housing provision being required to meet their own needs, aside from meeting any further unmet housing needs of Crawley Borough Council.</p>	See above

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			<p>It should not be assumed that the significant role played by the Manor Royal Employment Area in meeting the employment requirements of your Borough and the wider area will continue into the future without guidance through the Local Plan process.</p> <p>The uncertainty surrounding the DCO application for the permanent use of the standby runway is occurring concurrently with the timetable of the Crawley Borough Local Plan 2020-2035, with the former having undefined employment and housing consequences. If the public and other interested parties are to play an active role in the Local Plan process, then they are entitled to be provided with the full impact of large scale proposals which have an effect on the environmental, economic and social fabric of the Borough.</p>	
REP181/699	Tim North & Associates on behalf of Holiday Extras	Policy GAT3	<p>5. Policy GAT3 Gatwick Airport Related Parking</p> <p>Lastly, Holiday Extras Ltd note that Policy GAT3 taken from the adopted Crawley Borough Local Plan 2015-2030 has been reintroduced into the emerging Local Plan.</p> <p>The operation of this policy has revealed that restricting additional or replacement airport related parking within the airport boundary is fundamentally inconsistent with the provisions of Schedule 2 Part 8 Class F of the Town &amp; Country Planning (General Permitted Development) (England) Order 2015 (As Amended), and therefore should either be amended or deleted. Recent proposals for long term on-airport car parking, illustrated by Application No. CR/2017/0523/CON concerning the provision of car park decking on Zones F &amp; G, have revealed that no demonstrable need was advanced by GAL as part of its consultation in respect of this development.</p> <p>This is understandable in that the second limb of Policy GAT3 serves no useful purpose, given that a requirement set out in a policy in a “<i>development plan</i>” cannot override permitted development rights, unless the Council concerned removes that</p>	Disagree. The council considers the airport is the most sustainable location for airport-related parking, should it be justified in the context of proposals for achieving a sustainable approach to surface transport access to the airport. Therefore, Policy GAT3 (now GAT2) requires all new airport-related parking to be located on airport.

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			<p>specific development right through an Article 4 Direction in accordance with the Town &amp; Country Planning (General Permitted Development) (England) Order 2015 (As Amended).</p> <p>To the extent that your Council considered that the building operations the subject of Application No. CR/2017/0523/CON constituted permitted development, for which no express planning permission was required (which is accepted by those advising Holiday Extras Ltd), means that there is no requirement on the part of GAL to produce an assessment of demonstrable need to justify the same building operations, in accordance with the second limb of Policy GAT3.</p> <p>Policy GAT3 also has implications seen in terms of alternative forms of airport related car parking. No consideration has been given to the increasing provision of organisations such as JustPark which, as a technological platform matching drivers with car parking spaces through its website and app, representing part of what is referred to as the “<i>sharing economy</i>”, has a profound impact on the ability to reduce the private car mode in favour of public transport.</p> <p>To this consideration should be added that if the Council wishes to impose an embargo on legitimate organisations wishing to set up lawful long term off-airport car parking operations based on the park-and-ride model, will simply play into the hands of those unauthorised long term off-airport car parking businesses operated by rogue traders, with all the bad publicity that entails. It will also give increased emphasis to landowners seeking CLEUDs on land for long term off-airport car parking purposes on sites which are distant from the Airport, and which from a sustainability perspective, along with the park and fly mode, is least desirable.</p> <p>At a time when the number of long term off-airport car parking companies has never been lower, demands that policy should be reworded and extended to allow for appropriate choice in necessary</p>	



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			airport related car parking provision, albeit subject to a levy being imposed to assist future sustainable development programmes.	
REP184/721	Sussex Wildlife Trust	Policy GAT1	<p>Section 10 - Gatwick Airport Strategic Policy GAT 1: Development of the airport with a single Runway</p> <p>SWT does not believe that the sustainable expansion of Gatwick Airport is possible against the backdrop of the legal requirement to reduce carbon emissions and meet net zero targets. We recognise the inclusion of this policy within the draft plan, but feel disappointed that it fails to mention the biodiversity value of the safeguarded land within the bullet point related to the impacts of operations of the airport on the environment. The biodiversity value of the safeguarded area is acknowledged in Gatwick's own Biodiversity Action Plans and 5 Year Review with much of the land under management for biodiversity having achieved the Biodiversity Benchmark award. Therefore we request the following amendment:</p> <p>'ii. The impacts of the operation of the airport on the environment, including noise, air quality, flooding, surface access, visual impact, <b>biodiversity</b> and climate change, are <del>minimised</del> <b>avoided</b>, where required appropriate mitigation is provided and, as a last resort, fair compensation is secured; and</p>	Policy GAT1 amended to add reference to Biodiversity but "minimised" wording retained.
REP184/722	Sussex Wildlife Trust	Policy GAT2	<p>Strategic Policy GAT2: Safeguarding Land</p> <p>The draft plan questions the need for policy GAT2, however it is not currently clear what the safeguarded land would be considered potentially suitable for if the safeguarding was removed. In particular, section 10.20 refers to the land being used to meet Crawley's unmet business land needs due to the unacceptable impact associated with aircraft noise. However, section 12.40 states that there are opportunities for additional housing provision within the safeguarded land. Whilst SWT does not support the expansion of the airport, it must be made clear what the potential impacts on</p>	The council does not consider the government's draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough

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			the land, and in particular those areas of high biodiversity value, will be if the safeguarding is removed.	boundary if safeguarding remains in place. Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for development and infrastructure within the AAP area will be assessed and identified as part of the AAP, as will areas of high biodiversity value. Prior to the adoption

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				of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.
REP185/738	Carter Jonas on behalf of Homes England	Policy GAT2	<p><b>Strategic Policy GAT2: Safeguarded Land</b></p> <p>GAT2 asks a number of questions in relation to safeguarding land for the expansion of Gatwick Airport. Whilst Homes England has no comment on the principle of safeguarding because it is assumed that some form of safeguarding will be required, in light of the proposed use of the emergency runway that will increase the airport's capacity, Homes England considers that the boundary of the safeguarded area should be reviewed.</p> <p>The justification for this review is twofold, firstly, it is not clear that this scale of expansion would now be necessary with the assumption that the emergency runway to the north will be utilised and secondly, a reduced area could ensure the economic priorities of the Council and the objectives of the Strategic Economic Plan can be delivered. It would therefore seem logical that a smaller area of land should be safeguarded and it should not extend as far southwards as currently proposed.</p> <p>However, Homes England is not putting forward detailed proposals for safeguarding because this exercise should properly be led by both GAL and CBC. Homes England will submit comments on the extent of the safeguarding land when it is confirmed by Gatwick Airport.</p>	<p>Support the review of safeguarding noted. The council does not consider the government's draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place.</p> <p>Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western</p>

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				link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for development and infrastructure within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.
REP186/761	CPRE Sussex	Policy GAT1	<p><b>Policy GAT1: Development of the Airport with a Single Runway Consultation Questions:</b>  <b>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?</b></p> <p>We do not consider that the growth of Gatwick Airport is sustainable. The most recent Gatwick Masterplan (produced this year) proposes the use of the standby runway in addition to safeguarding land for an additional runway in the future.</p> <p>Growth projections underpinning the Masterplan suggest that use of the standby runway could see passenger numbers grow to 70 million passengers per annum (mppa) by 2032/33, a 53% increase</p>	In its response to Gatwick Airport's Scoping Report, as part of the Development Consent Order process, the council has raised questions about the impact of the use of the standby runway on the UK's Climate Change commitment. The Planning Inspectorate will determine this application.

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			<p>on the 45.7 million passengers who used the airport in 2017/18. Aircraft movements are set to grow at a slower rate due to an estimated 10% increase in the average number of passengers per plane, but by 2032/33 they could reach 390,000 movements per annum, a 39% increase. The Masterplan suggests that if an additional runway is built, the airport's capacity could eventually reach 95 million passengers per annum.</p> <p>According to research by the AEF (Aviation Environment Federation) the Department for Transport's 2017 UK Aviation Forecasts for air passengers, aircraft movements and CO2 emissions at UK airports, provide better evidence for the likely carbon impacts of expansion out to 2050 than the somewhat limited information within the Gatwick Masterplan. Unlike Gatwick's estimate, the DfT forecasts calculate the emissions for the entire flight and attribute them to UK airports on the basis of all departing flights. In a 2050 scenario where Heathrow builds and operates a third runway, Gatwick Airport (without using its standby runway), is assumed to handle 52 mppa, served by 297,000 aircraft movements annually, and generating 2.7MtCO2.</p> <p>Assuming Gatwick's standby runway continues to serve a similar range of destinations with the same aircraft fleet mix, and extrapolating the data from the DfT's scenario and applying it to an increased passenger throughput of 70mppa, this would equate to 3.63MtCO2 in 2050, an increase of nearly 1MtCO2. This may prove to be a conservative figure if Gatwick develops a wider range of long-haul destinations than assumed by the DfT model, or if its passenger numbers increase beyond 70mppa between 2033 and 2050. It is also dependant on delivery of a large number of modelling assumptions including the application of a carbon price that reaches £221 per tCO2 by 2050 (substantially higher than the carbon prices that apply to aviation today, or that are likely to apply</p>	

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			<p>in the coming years) and a 48% improvement in aircraft efficiency between 2016 and 2050.</p> <p>In relation to the Climate Change Act's original 80% reduction target, the Committee on Climate Change (CCC) consistently advised Government that it should plan for UK aviation emissions in 2050 to be no higher than they were in 2005 (when the sector emitted 37.5Mt CO<sub>2</sub>). CCC is now expected to write to the Secretary of State this autumn setting out its recommendations for the aviation sector consistent with delivering the newly legislated net zero target. Based on the CCC's modelling scenarios, there is a strong suggestion that the sector may need to limit its emissions to somewhere between 22-30MtCO<sub>2</sub> by 2050, balanced by carbon removals, if the UK is to reach net zero greenhouse gas emissions across the economy. However, with the addition of a third runway at Heathrow, the DfT forecasts show that emissions will not even meet the current 37.5Mt planning assumption and will rise to around 40Mt by 2050. As this forecast assumes other airports will only grow to the levels determined by their existing terminal and runway capacities, the prospect of an additional 1MtCO<sub>2</sub> from use of Gatwick's standby runway, plus any increases from proposed airport developments elsewhere, will heighten the scale of the problem. This will threaten the UK's ability to meet its climate target and is therefore unsustainable.</p>	
REP186/762	CPRE Sussex	Policy GAT2	<p><b>Policy GAT2: Safeguarded Land Consultation Questions:</b>  <b>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?</b></p> <p>We are concerned about the high environmental value of safeguarded land and would like this to be protected if the land is no longer safeguarded for Gatwick's expansion.</p>	The council does not consider the government's draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035,

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				<p>which cannot be met within the borough boundary if safeguarding remains in place.</p> <p>Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for development and infrastructure within the AAP area will be assessed and identified as part of</p>

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				the AAP, as will areas of high biodiversity value. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.
REP190/791 (repeat)	Barton Willmore on behalf of Legal & General Capital		<p>Thank you for the opportunity to comment on the early draft of the emerging local plan review ('the Draft Plan'). We are instructed by Legal &amp; General Capital ('L&amp;G').</p> <p>L&amp;G is committed to unlocking investment opportunities and supporting economic growth. It aims to invest in economically and socially useful assets from conception to delivery and for the long term, focusing on direct investments in key sectors including housing, employment, infrastructure and SME finance.</p> <p>As part of its strategic investments, L&amp;G owns land adjacent to key transport infrastructure such as airports. This includes land within the southern part of Mole Valley District adjacent to Gatwick Airport.</p> <p>L&amp;G controls some 155 ha of land immediately to the north of Gatwick Airport ('the Site'). Although the Site falls within Mole Valley District, it lies immediately adjacent to the Borough boundary and the Airport. Please find enclosed a site location plan and also a plan showing the broad location on the key diagram at page 15 of the consultation Draft Plan.</p> <p>The Site is being promoted to provide a range of employment uses to provide much needed additional commercial accommodation to meet the needs arising from the continued success of the Airport and the economic activity that it generates. Crawley is a 'land locked' borough with limited if any opportunity for extending development beyond the current confines of the urban area, certainly whilst the airport safeguarding is retained. Whilst the Site lies outside of the Borough boundary, it is widely recognised that Crawley is reliant on provision elsewhere to meet its identified</p>	This site is outside the Local Plan area, within Mole Valley. The Local Plan is based on the constrained, past trends scenario of 33ha need set out in the EGA which means there is currently an unmet need of 21ha. Ongoing liaison is taking place with neighbouring councils to determine how much and where this can appropriately be located. MVDC has advised it is unable to accommodate Crawley's unmet employment needs due to significant physical and policy constraints on development in the south eastern part of Mole Valley, adjacent to Crawley.



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			<p>needs. The Site can play an important role in meeting those needs and also providing additional space for airport related activities.</p> <p>The Draft Plan correctly identifies the important role of the Airport in driving and supporting economic activity in Crawley and the wider Gatwick Diamond. It also identifies the challenges set by the population profile of the borough and the challenges in terms of skills.</p> <p>Gatwick Airport Limited ('GAL') has now published its final Master Plan 20191. The Master Plan signals an intention to seek permission, through a Development Consent Order ('DCO'), to expand the capacity of the Airport by utilising the existing stand-by runway. This will generate significant economic benefits which must be appropriately addressed and planned for through the DCO process but also through the relevant development plans.</p> <p><b>Duty to Co-operate and Green Belt</b></p> <p>We welcome the positive response in the Draft Plan to the opportunity presented by the Airport and commitment to continue to work with adjoining districts and boroughs, together with the LEP and other bodies, albeit the Draft Plan is silent in large part in relation to Mole Valley. This, we presume, is a function of the Green Belt status of much of the land within Mole Valley that lies within proximity of the Airport rather than the lack of desire on behalf of either authority to positively engage. However, it is our view that airport expansion of the scale proposed must be positively planned for by all authorities in proximity. Whilst the preparation of the Mole Valley Local Plan has proved to be protracted and subject to a further delay, the emerging local plan will need to address the effect of expansion at Gatwick and be informed by positive engagement with Crawley and other neighbouring authorities. This will manifest in the need for additional land to meet that commercial demand,</p>	

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			<p>over and above that identified in the Draft Plan, which already identifies a significant shortfall.</p> <p>The need to provide for additional land to meet the commercial needs of the Airport and the economic activity that its generates, in a sustainable manner that by definition does not result in extended travel times (with the attendant impact upon commercial attractiveness as well as journey times), would constitute an exceptional circumstance at the local plan review stage.</p> <p>The opportunity presented by land immediately to the north of the Airport in Mole Valley should therefore be included in any 'search' beyond the Borough's boundaries.</p>	
REP190/792	Barton Willmore on behalf of Legal & General Capital		<p><b>Airport Expansion</b></p> <p>The consultation Draft Plan was written in advance of the publication of the final Airport Master Plan by GAL. The Master Plan commits GAL to promoting the use of the existing second runway through the DCO process. This will confirm the need for the expansion and the demonstrable benefits thereof. Such benefits, we say, include the continued generation of economic activity which will manifest in a continued demand for commercial space. It is important that the plan-making system puts in place appropriate policy responses to capture those benefits. At the present time, such a duty falls on the district and borough councils and pro-active engagement and discharge of the duty to co-operate is essential.</p> <p>The Draft Plan identifies a shortfall in pipeline supply of commercial accommodation equating to some 32.8 ha of land "<b>just to meet minimum baseline demand of land for business uses</b>" (see para 9.17). This is in the absence of any expansion of the Airport as now proposed and certainly would not appear to provide any flexibility in supply.</p> <p>The Airport Master Plan estimates that, by bringing the existing stand-by runway in to use alongside the main runway, jobs directly</p>	Policy GAT1 amended to include additional wording about the DCO. CBC's response to the Planning Inspectorate about Gatwick Airport's Scoping Report requests further information on employment impacts.

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			<p>and indirectly generated by the Airport would increase from 79,000 to 91,000 by 2028 (see page 112).</p> <p>The Draft Plan should be clear as to how it will respond to any DCO granted as now proposed in the Airport Master Plan. The DCO process follows a statutory timetable once an application has been submitted, taking approximately 18 months from submission to decision. During that period there is a maximum of 6 months for Examining Inspectors to request information and test the evidence submitted with the application and by Interested Parties. The Council will be asked to submit a Local Impact Report to the Examination setting out its position on planning policies and other matters.</p> <p>Early, pro-active engagement through the Development Plan and DCO pre-application processes will help to ensure that the Council is properly prepared to participate in any DCO examination. In particular, it will enable the Council to submit robust evidence on how it can demonstrate that the benefits of expansion have been properly planned for and secured.</p>	
REP191/797	Quod on behalf of Aberdeen Standard Investments	Policy GAT2	<p><b>Airport Expansion Safeguarding</b>  <i>Gatwick Airport Chapter Consultation Questions - Should land south of Gatwick Airport continue to be safeguarded for a potential future wide-spaced additional runway? Policy GAT2 - 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?</i></p> <p>The Adopted Local Plan includes an airport expansion safeguarding policy, Policy GAT2. Policy GAT2 states that land designated as such on the Proposals Map “<i>will be safeguarded from development which would be incompatible with expansion of the airport to accommodate the construction of an additional wide spaced runway (if required by national policy) together with a commensurate</i></p>	<p>Support for removal of safeguarding noted.</p> <p>The council does not consider the government’s draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough</p>

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			<p><i>increase in facilities that contribute to the safe and efficient operation of the expanded airport.”</i></p> <p>The wording of the Adopted Local Plan makes it clear that the airport expansion safeguarding was only in place to provide for the scenario where Gatwick Airport was identified as the location for additional airport capacity within the South East pursuant to the Airports Commission. The Airports Commission did not select Gatwick Airport to provide that additional capacity, and Policy GAT2 is now out of date.</p> <p>The analysis of the Airports Commission Report supported growth at Heathrow Airport which followed a long period of very close scrutiny. The Government supported the Airports Commission conclusions and adopted the ANPS in June 2018. The ANPS confirms that the need for additional runway capacity in the South East will be met by the Heathrow Northwest Runway, and not at Gatwick Airport. Gatwick Airport has not made a legal challenge to the ANPS, and as identified below is no longer promoting a new runway.</p> <p>As such, Policy GAT2 was included within the Adopted Local Plan in a circumstance where:</p> <ol style="list-style-type: none"> <li>1. there was a recognised need to deliver new runway capacity in the South East;</li> <li>2. Gatwick Airport was promoting a scheme comprising a third runway to meet that identified capacity; and</li> <li>3. the Airports Commission had yet to decide on where that runway capacity should be delivered.</li> </ol> <p>Even in those circumstances, it was only considered appropriate for Policy GAT2 to be a conditional policy, being conditional upon the outcome of the Airports Commission’s work. The outcome of that work means that Policy GAT2 is out of date.</p>	<p>boundary if safeguarding remains in place.</p> <p>Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for development and infrastructure within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the</p>

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			<p>The Adopted Local Plan Inspector's Report stated that "<i>substantial areas of potentially developable land in the north of the Borough are currently safeguarded from development which would be incompatible with the development of a second runway. Consequently, the Government's decision on the location of an additional runway could have significant implications for future development in the Borough</i>" (Paragraph 12). As such, the effect of continued safeguarding would have significant implications for such development.</p> <p>The current situation is now materially very different to that during the drafting of the Adopted Local Plan, and there is no robust evidence for the retention of the airport expansion safeguarding.</p> <p>Firstly, there is no identified need for further runway capacity (beyond that which will be met at Heathrow Airport) in the South East and no evidence that there will be such need during the Plan period. The evidence is that the delivery of Heathrow's expansion will deliver the capacity required in the South East. Furthermore, there is no identified need for further runway capacity nationally.</p> <p>The Government's emerging Aviation Strategy 2050 has not identified the need for further capacity - a long term assessment is to be carried out and conclusions drawn accordingly.</p> <p>The Plan period will run from 2020 to 2035, and the Heathrow expansion was identified as being required to deliver capacity by 2030. This is in place and addresses the capacity issue in the South East during the Plan period. This is a materially different position to the Adopted Local Plan, when there was evidence of such need in the South East.</p> <p>Secondly, Gatwick Airport:</p> <ol style="list-style-type: none"> <li>1. is no longer subject to the restriction on the emergency runway (as it was before), with the 1979 Section 52 Agreement with</li> </ol>	AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.

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			<p>West Sussex County Council which precluded the simultaneous use of both runways expiring in 2019; and</p> <p>2. have confirmed that they are no longer pursuing an additional wide spaced runway in their 2019 Masterplan and within the EIA Scoping Report (September 2019) associated with a forthcoming DCO application to make best use of the existing emergency runway. Furthermore, no assessment has been undertaken regarding a third runway at Gatwick Airport. This is consistent with national policy, which supports all airports making best use of their existing runways but which does not support the delivery of new runways, save at Heathrow.</p> <p>This is a materially different position to the Adopted Local Plan, when Gatwick Airport was subject to the restriction on using the emergency runway and were promoting expansion via a third runway. This is also important, as Gatwick Airport has considered and discounted the scenario of an extra runway in its EIA Scoping Report based on Government policy and the capacity that it can deliver through best use of its existing runway Gatwick Airport state at Paragraph 5.4.11 of the 2019 Masterplan that <i>“while we [the Airport] are not actively pursuing an additional runway at Gatwick we believe it is in the national interest to continue with this strategy of land safeguarding. This will preserve the option of building an additional runway in the future to meet the future airport capacity gap that the Government’s forecasts indicate will occur even with a third runway constructed at Heathrow.”</i> As identified above, there is no evidence of such need and there is certainly no evidence that there will be a need for such capacity to be met at Gatwick Airport.</p> <p>Notwithstanding the lack of evidence for need, Gatwick Airport’s DCO proposal would, by 2038 (i.e. beyond the Plan period), increase Gatwick Airports’s maximum potential passenger throughput to approximately 74 mppa, compared to a maximum</p>	

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			<p>potential passenger throughput based on existing facilities of 61 mppa (paragraph 5.2.5 of Gatwick Airport's Scoping Report). This represents an increase in maximum capacity of approximately 13 mppa. In 2018, Gatwick Airport's actual level of total passengers was 46 mppa (paragraph 4.2.1 of Scoping Report). Therefore, the maximum capacity at Gatwick Airport as permitted by the DCO proposal would outstrip the current usage by 28mppa (a more than 50% increase in passengers per annum).</p> <p>The ANPS does not prevent Gatwick Airport from promoting a scheme for a third runway, and the ANPS would still be a relevant and material consideration in the event that Gatwick Airport did promote a scheme for a third runway. However, Gatwick Airport has identified that additional capacity at Gatwick Airport can be delivered by 2038 through existing use of the emergency runway (in addition to the capacity requirements of the south east being met by Heathrow expansion).</p> <p>Thirdly, the Government's position on safeguarding has changed from that set out in the Aviation Policy Framework, with Councils afforded more control to decide if "robust evidence" exists to justify continued safeguarding in line with the NPPF. Paragraph 3.66 states:</p> <p><i>"Several airports safeguard land for future developments. The safeguarded land can be a mix of airport, council and private ownership, depending on the individual airport's circumstances. It is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth. The National Planning Policy Framework (NPPF) has restated 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". The</i></p>	

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			<p><i>government believes that this provides sufficient guidance for local authorities to consider the future needs of airports and their associated surface access requirements, when developing local plans”.</i></p> <p>Overall there is no case for the airport expansion safeguarding as there is no evidence that there is any need for such expansion and Gatwick Airport is not promoting such expansion. The “robust” evidence required to support safeguarding does not exist. As such, Draft Policy GAT2 should be deleted. In the Adopted Local Plan, Policy GAT2 was included (on a conditional basis only) based on such need existing and Gatwick Airport promoting a scheme to meet that need. It would be irrational to include safeguarding now when the conditionality behind Policy GAT2 no longer exists.</p> <p>It is also important to note that a safeguarding policy is not a requirement for future airport expansion and the lack of a safeguarding policy would not frustrate future expansion (whereas the inclusion of a safeguarding policy would frustrate development to meet identified need in the Plan period and potentially beyond).</p> <p>If the situation arose where there was any evidence of the need for further expansion and Gatwick Airport sought to promote that by a third runway, then as part of any future DCO Gatwick Airport would be able to seek to compulsorily acquire third party land to deliver such expansion in the same way that Heathrow Airport are currently doing as part of their expansion plans. This is how the majority of major UK infrastructure is delivered.</p> <p><i>Gatwick Airport Chapter Consultation Questions - Should the Airport Boundary be changed to the boundary shown in the Airport Master Plan? Policy GAT1: 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</i></p>	



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			<p><i>from the Local Plan 2030 Airport Boundary. The council is considering whether or not it supports these proposed changed; do you have any comments?</i></p> <p>We have no comment with regards to the area identified “Existing Airport Boundary” on Plan 21, however for the reasons set out above the robust evidence that is required to support the safeguarding boundary does not exist and this boundary should not be identified.</p>	
REP196/808	Environment Agency	Policy GAT1	<p><b>Gatwick Airport</b> - The location, topography and large areas of impermeable surfaces at the Airport result in the area being at risk to both fluvial and surface water flooding.</p> <p><b>Policy GAT1</b> – We note and welcome that the management of flooding is highlighted as part of this policy. We also welcome the reference to the need for adequate infrastructure to be part of any future development, as this includes the provision of flood risk management infrastructure. The future expansion of the Airport is likely to introduce further areas of impermeable hard standing which could increase the volume and rate of surface water runoff, and this will need to be managed as part of any future development. The Airport is also impacted by fluvial flooding, any development plans for the Airport will need to be supported by a detailed Flood Risk Assessment which sets out how flood risk elsewhere will not be increased as a result of development at Gatwick.</p>	Support noted.
REP197/826	Reigate & Banstead Borough Council	Policy GAT1	<p><u>Gatwick Airport and associated issues</u></p> <p>We note the overarching approach in draft Policy GAT1, which supports the sustainable growth of Gatwick Airport as a single runway, two terminal airport. This is broadly consistent with our own Core Strategy (Policy CS9) which supports development of Gatwick Airport within the existing boundary and existing legal limits.</p> <p>We agree that, as set out in GAT1 and paragraph 10.13, it is important that any future growth minimises the impacts of operation</p>	Support noted. Text of para 10.13 to be amended to reference joint working.

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			of the airport on the local environment and surrounding residents (including in Reigate & Banstead), is supported by appropriate infrastructure and maximises benefits across surrounding authorities. We would welcome reference in GAT1 and its reasoned justification to the importance of joint working with neighbouring authorities and partners across the Gatwick Diamond through existing mechanisms such as Gatwick Officers Group (GOG), to ensure that these shared strategic objectives are achieved for all.	
REP197/827	Reigate & Banstead Borough Council	Policy GAT2	With respect to safeguarding (GAT2), we tentatively support maintaining of safeguarded land in order to provide future flexibility; however, we stress that this should not be interpreted as Council support for a new southern runway. We do not have a particular view on the delineation of the boundary.	Position noted. The council does not consider the government's draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place. Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered,

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				alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for development and infrastructure within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.
REP197/828	Reigate & Banstead Borough Council	Policy GAT3	We strongly support the approach set out in draft Policy GAT3 which seeks to ensure that airport-related parking is not provided outside of the airport boundary and that any additional parking is fully justified. This approach is aligned with policies in our own DMP (TAP2) and reflects the long-standing, cross-boundary approach to the management of parking associated with the airport in order to promote sustainable travel and minimise the adverse impacts which inappropriately located airport car parking can have on host communities.	Support noted.
REP197/829	Reigate & Banstead	Policy GAT4	We support the approach in GAT4 relating to commercial uses within the airport boundary but would welcome recognition of the	Support noted. Policy GAT4 (now GAT3) to be amended.

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	Borough Council		need to consider impacts on the roles and function of town centres and employment areas beyond Crawley's boundaries which could equally be affected by such development.	
REP198/837	The Ifield Society		<ul style="list-style-type: none"> <li>• <b>What key issues do you think should be considered to ensure any growth at Gatwick Airport is sustainable?</b> See Gatwick Airport Master Plan 2019 – Executive Summary. 3 Key issues (1) Single Runway (2) Single runway &amp; Standby Runway, or (3) Safeguard for additional runway.</li> <li>• <b>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?</b> Off-airport parking can be provided within the areas safeguarded for additional runway (I am strongly against <u>any</u> additional runway – especially the wide-spaced option) Air quality and noise levels are only two factors involved.</li> <li>• <b>Should land south of Gatwick Airport continue to be safeguarded for a potential future wide-spaced additional runway?</b> Definitely not!!</li> <li>• <b>Should the airport boundary be changed to the boundary shown in the Airport Master Plan?</b> No – please see Plan 31. Air Noise Map (<b>*Appendix 6 provided with original representation to support*</b>) (the issue of St. Michael and All Angels Church in Lowfield Heath has never been addressed. Built and designed by the famous William Burges with its magnificent Rose Wheel Window).</li> </ul>	<p>Disagree. The council considers the airport is the most sustainable location for airport-related parking, should it be justified in the context of proposals for achieving a sustainable approach to surface transport access to the airport. Support for removal of safeguarding noted.</p> <p>The council does not consider the government's draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place.</p> <p>Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an</p>

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				<p>AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for development and infrastructure within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.</p> <p>Some amendments have been made to the Airport Boundary, but it does not fully correspond to the Master Plan boundary.</p>
REP107/846	Town Access Group		<ul style="list-style-type: none"> <li>• <b>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?</b></li> </ul>	The council considers the airport is the most sustainable location for airport-related parking, should it be justified in

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			We support more off-site <u>regulated</u> parking but there needs to be accessible shuttlebus provision.	the context of proposals for achieving a sustainable approach to surface transport access to the airport. The issue regarding an accessible shuttlebus will be raised with GAL and parking operators.
REP209/935	Horsham District Council	Policy GAT1 and Policy GAT2	<p><b>Gatwick Airport</b></p> <p>We are pleased to note that the draft Crawley Borough Local Plan recognises that Gatwick Airport Limited (GAL) has longer term aspirations as set out in their 2018 Masterplan documentation. You are of course aware that that GAL has now commenced formal consultation under the Development Consent Order (DCO) process. Although the outcome of this process is not yet known, we would wish to highlight that any growth of the airport will have impacts for Horsham District as well as Crawley Borough, and that this may ultimately have implications for our own Local Plan Review, particularly in relation to economic development and future housing growth. We would therefore welcome further ongoing discussion and joint working with you on this matter as may be appropriate.</p> <p>We also note your options set out in Policy GAT2: Safeguarded Land, where you state that depending upon the outcome of the Government's Aviation Strategy / and the aspirations set out in the 2018 draft Master Plan the safeguarding land will either be retained or deleted. As you will be aware, a small portion of the North West corner of Horsham district is also covered by the same safeguarding designation. The extent of this area is set out on our current Horsham District Framework Policies map. The uncertainty surrounding this matter is therefore also an issue for our Council, and we have also responded to recent consultations requesting that certainty is provided in relation to this matter. We are therefore supportive of the current approach set out in your documentation</p>	<p>Reference to joint working to be included in para 10.13 to GAT1.</p> <p>The council does not consider the government's draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place.</p> <p>Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered,</p>

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			and would ask that further dialogue on this matter continues between the two authorities as we undertake our own Local Plan review.	alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for development and infrastructure within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.

<b>ECONOMIC GROWTH &amp; SOCIAL MOBILITY: CRAWLEY TOWN CENTRE</b>				
<b>Representor/ Representation Reference</b>	<b>Name/ Organisation</b>	<b>Policy/ Para/ Page No.</b>	<b>Comments</b>	<b>CBC Response</b>
REP184/723	Sussex Wildlife Trust	Policy TC2	<p>Section 11 – Crawley Town Centre Strategic Policy TC2 Town Centre Neighbourhood Facilities We would encourage CBC to include a reference to high quality green spaces that is accessible to all within the list of neighbourhood facilities. This is in line with paragraphs 91 and 96 of the NPPF. We therefore make the following amendment to the policy:</p> <p>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:</p> <ul style="list-style-type: none"> <li>i. Local shopping facilities;</li> <li>ii. Community facilities, including community halls, flexible community space, and space for religious or faith activities;</li> <li>iii. Healthcare</li> <li>iv. Education</li> <li>v. Leisure provision.</li> <li><b>vi. High quality green open space, accessible to all.</b></li> </ul>	Noted. It is agreed that access to open/recreational amenity space is an important component of Crawley's neighbourhood offer. Given the compact land-constrained position of the town centre, it will be challenging to deliver green open space that is accessible to all. Therefore, a further policy criteria has been added that refers to 'accessible open or recreational amenity space', which is likely to be more achievable given the predominantly flatted nature of town centre residential accommodation.
REP188/781	Turley on behalf of Rainier Developments	Policy TC2	<p><b>Policy TC2: Town Centre Neighbourhood Facilities</b></p> <p>2.28 The principle of this policy to support applications for new facilities and services within Crawley Town Centre to ensure the needs of its growing residential population is supported. The policy however should be worded more clearly to reflect that the policy is to be applied to applications for new facilities only and that it is not seeking applications for residential development in the Town Centre to deliver the services and facilities listed within the policy on site.</p> <p>2.29 Whilst not required by this policy, the proposed development will deliver a range of 'neighbourhood facilities', including the pocket park which will provide open space within an area which is currently lacking such facilities, together with a range of flexible commercial</p>	Noted and support welcomed. The intention of this policy is to encourage the delivery of town centre neighbourhood facilities and services. All forms of residential development, whether in the Town Centre or elsewhere, will be required to meet the infrastructure needs that it generates, and this is picked up in the Local Plan, in particular through Policy IN1 and the Local Plan Planning Obligations Annex.




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			spaces which can be used for a range of use classes able to meet changing commercial needs in the district.	Noted. It is recognised that open/recreational amenity space is an important component of Crawley's neighbourhood offer. Therefore, a further policy criteria has been added that refers to 'accessible open or recreational amenity space', which is likely to be more achievable given the predominantly flatted nature of town centre residential accommodation.
REP188/782	Turley on behalf of Rainier Developments	Policy TC3	<p><b>Policy TC3: Development Sites within the Town Centre Boundary and TC4: Active and Engaging Frontages</b></p> <p>2.30 Rainier support the Council's recognition that sites within the Town Centre provide an opportunity to deliver mixed use development and the opportunities this provides in the creation of sustainable, balanced neighbourhoods whilst enhancing the vitality and viability of the town centre through increased footfall and activity.</p> <p>2.31 The proposed development has been designed to correspond with the wider regeneration works associated with the 'Crawley Station and Car Parks' site specifically allocated within Policy TC3.</p> <p>2.32 To complement with the Station Gateway scheme, the proposed development will form a continuation of active frontages along Station Way improving the legibility, and rhythm of buildings as well as assisting with the sense of security through natural surveillance provided by the proposed development. It is also considered that the new pocket park will create a natural place of convergence and punctuation along a linear road, which will again assist with place making and the formation of active frontages.</p>	Noted and support welcomed. Specific issues of design would need to be considered as part of the planning application decision making process.

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			2.33 This will ensure the proposals create a strong sense of place and an attractive and distinctive place to live.	
REP197/825	Reigate & Banstead Borough Council	Policy TC5	<p><u>Retail and town centres</u></p> <p>We support the town centre first approach in Policy TC5 which is consistent with national policy and the approach set out in our DMP (Policy RET5). We do however note that, in respect of considering retail impact, the policy narrowly focusses on “<i>the town centre</i>” which we assume to mean Crawley Town Centre. We are concerned that this may exclude consideration of potential impacts on town centres in neighbouring areas, such as Horley, which could arise depending upon the location of any out of centre proposals. We would therefore welcome clarification in the policy or reasoned justification to ensure that cross-boundary impacts are properly considered.</p>	Noted. Policy wording and supporting text has been amended to refer specifically to Crawley Town Centre and other centres within the retail catchment.
REP198/838	The Ifield Society		<ul style="list-style-type: none"> <li>• <b>What makes you want to visit and spend time and money in Crawley town centre?</b> The Queensway Water Fountains have made it a great pleasure when in town.</li> <li>• <b>Is there anything else you would like to see in the town centre?</b> More ‘spontaneous’ presentations by artists (music, painting, mime, face-painting, etc.) – similar Covent Garden.</li> <li>• <b>Crawley town centre is becoming a residential neighbourhood in its own right. What facilities and services are needed to support its growing population?</b> Improved infrastructure e.g. Health, Community Facilities, Green Infrastructure, Adult Social Care, etc.</li> </ul>	Noted and support welcomed. The growth and vibrancy of Crawley Town Centre will be supported by the policies set out within the Local Plan Town Centre chapter, and also wider policies including EC5 (evening and night time economy), EC7 (Creative Industries), EC8 (Flexible Temporary Art and Creative Uses), and H3d (Town Centre Sites).
REP107/847	Town Access Group		<ul style="list-style-type: none"> <li>• <b>What makes you want to visit and spend time and money in Crawley town centre?</b> The good disabled access for those of us who need it.</li> </ul>	Positive. Noted and support welcomed.

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REP209/936	Horsham District Council	Policy TC3 (repeated in Housing)	<p><b>Housing</b></p> <p>We recognise that your bound administrative area presents challenges in meeting the identified housing needs of Crawley in the period to 2035. We are therefore pleased to see that the draft plan has sought to identify a number of different mechanisms by which the standard housing methodology figures as calculated for Crawley Borough could be achieved. We note that this covers a range of approaches, including through increased densities, estate regeneration, the development of any surplus open spaces, town centre development and upward extensions, increased building heights and garden sites.</p> <p>What is not clear to us at this stage is the extent to which the potential yield that such approaches could generate over the plan period has been considered, and whether there is potential for this to assist housing delivery, particularly in the latter part of the plan period. Given the very significant levels of housing need for Crawley as well as Horsham District (and the wider north west Sussex authorities as a whole), it will be important to ensure that 'no stone is left unturned' in considering how the additional housing could be delivered. Although we recognise this may not be a straightforward exercise, we would request that further examination of the likely extent and timing of such delivery is undertaken as far as is possible. For example, it may be possible to identify older estates where renewal schemes might come forward. In addition, an examination of existing rates of loss of garden development / surplus open space together with any emerging evidence on sports and open spaces could help to predict if other land can be converted over the plan period. Further work and consideration of the potential location and extent of any densification would also be welcome to establish the potential delivery of additional housing through this mechanism. It is also suggested that the flexibility of</p>	<p>Support for Crawley maximising its housing delivery welcomed. Further detailed assessments of sites have been undertaken as Crawley's supply figure has been increased. Ongoing liaison with HDC will continue as part of Housing Market Area and Duty to Cooperate discussions.</p> <p>Policy TC3 is an allocation policy for the Town Centre Key Opportunity Sites. However, Policy H2 identifies the Town Centre as a Broad Location for Housing, Policy H3d sets criteria for Town Centre Sites as a housing typology, and other policies in the Town Centre and Economic Growth chapters are supportive of appropriate residential development in the Town Centre.</p>

<b>ECONOMIC GROWTH &amp; SOCIAL MOBILITY: CRAWLEY TOWN CENTRE</b>				
<b>Representor/ Representation Reference</b>	<b>Name/ Organisation</b>	<b>Policy/ Para/ Page No.</b>	<b>Comments</b>	<b>CBC Response</b>
			the town centre policy TC3 could be improved by reflecting the statement in para 11.22 that the currently identified sites are not comprehensive, for example by adding wording along the lines of "or other opportunity areas which are identified" in the first line of paragraph 3.	

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
REP1/001	Resident 1	Policy H8	<p>Taking a look at the map attached to the new Local Plan Review, I note that the Council's plans to use the Buchan kennels Site as a permanent traveller site appear to remain in place. See screenshots below from the plan:</p>  <p>I have commented on this previously and will do so again now. There are three major reasons why this site should be discounted for this purpose:</p> <ol style="list-style-type: none"> <li>1. This site as you are aware is adjacent to an SSSI and is designated as AONB which should mark such a site out as being unsuitable for any development but particularly one which will likely cause pollution of the land through the dumping of large quantities of industrial, work related and residential waste. Crawley has had to deal with the refuse left behind by travellers on many sites throughout the town over the years, but clearly if this is allowed to happen in this</li> </ol>	<p>This site was allocated in the adopted Local Plan, following a long period of site assessments and evidence gathering. A thorough assessment of potential sites was undertaken previously and this clearly highlighted there were limited alternative opportunities (only one alternative was considered 'suitable' enough for public consultation in 2013, and was subsequently discounted due to noise and flooding matters).</p> <p>On this basis the allocation was found 'sound' by the Planning Inspector. No further evidence has been submitted to suggest this decision was flawed or that circumstances have changed to warrant the de-allocation of the site as part of the Local Plan Review.</p> <p>The adopted Policy establishes requirements for access, highways, and AONB. This policy wording is being retained through the Local Plan Review.</p> <p>The site is being retained as a "reserve site", which means the earliest anticipated point it would become available will be after the first five years of the new Plan period. There has been no indication that there is any immediate need arising from Crawley's existing Gypsy and Traveller population. However, a potential need may arise in the future from new households created by these families who chose to take up a travelling lifestyle. On this basis, the dates set out in the Policy have been amended accordingly.</p>

HOUSING DELIVERY: HOUSING				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>location, it will impact more than an open space used by residents (as has happened many times previously), it will impact upon the species and biodiversity of a naturally sensitive protected site, spoiling not only the AONB which is a designation given on the basis of <u>visual</u> amenity but also the SSSI site, as the Council do not have the means to police this area and prevent the local extinction of important and protected wildlife via continual fly tipping.</p> <p>2. Whether it is a rational reaction or not, it is unreasonable that residents from neighbouring estates who make use of Buchan's wonderful natural resources should be subjected to that which I have outlined above and feel insecure in their use of the park due to the proximity of the travellers' site.</p> <p>3. Finally and most importantly, the current access to the site is inherently dangerous if not deadly, as to enter the site from this part of the A264, any vehicle has to slow down to 5mph on a 70mph blind bend and then navigate a steep twisting incline. Any vehicles attempting to leave the site have the equally lethal task of leaving from a steep incline facing in the wrong direction and accelerating from standing to 70mph as fast as possible to avoid a serious accident with any other road users. This is a major route for heavy haulage and goods vehicles too, which would certainly not be able to stop or swerve and could obliterate any vehicle attempting the above. My own wife passing the site entrance almost had a collision with a motorcycle, which coming down to the exit before joining the road was unable to stop in time. As the site stands it is inconceivable that vans with trailers and caravans could navigate such an entrance/exit safely and were it to be considered by the</p>	

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			<p>Council for a highway improvement scheme this would require huge change of infrastructure and cost implications in order to create an adequately safe entrance and exit. Not to mention the disruption to a major route whilst works are ongoing.</p> <p>In combination these 3 points clearly demonstrate that the use of this site is fraught with difficulty, potential danger and associated costs and it should therefore be discounted and an alternative sought by the Council.</p> <p>In closing I would add that I work for local government within the planning department, am a qualified Landscape Architect and have lived in Crawley pretty much my whole life, so I am not naive in my understanding of these matters and would ask the Council to consider the points I have made seriously.</p>	
REP2/002	Resident 2	Policy H3g	<p>I note that Homes England, in partnership with the Homes and Communities Agency and a consortium of developers, are currently promoting land West of Ifield (part of which falls within Crawley's boundary ) for a large new neighbourhood including 3250 affordable and social homes along with all the required infrastructure.</p> <p>Crawley council should work with these governmental agencies and developers to bring forward these plans a.s.a.p. to comply with the lawful requirement of their duty of co-operation with neighbouring authorities in order to deliver the desperately needed homes of all types currently so sadly lacking in both Crawley and adjacent areas which is leading to ever growing homelessness, overcrowding, depression and illness amongst residents.</p>	<p>Comments noted. The land promoted by Homes England is located within Horsham and will be considered as part of the Horsham District Plan review (including being assessed as part of their Sustainability Appraisal and other supporting evidence documents and subject to public consultation and independent examination). The Horsham Local Plan Review timetable can be found at:  <a href="https://beta.horsham.gov.uk/planning/planning-policy/local-development-scheme">https://beta.horsham.gov.uk/planning/planning-policy/local-development-scheme</a>            However, the Crawley Local Plan Review acknowledges that development on the edges of Crawley's administrative boundaries has taken place over the years to varying degrees of involvement, and agreement, of Crawley</p>

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<b>Representor/ Representation Reference</b>	<b>Name/ Organisation</b>	<b>Policy/ Para/ Page No.</b>	<b>Comments</b>	<b>CBC Response</b>
				<p>Borough Council. In such cases, much of the impact on infrastructure and strategic facilities and services falls on Crawley.</p> <p>Whilst Crawley Borough Council is not able to direct development outside of its administrative area, Crawley's proposed draft policy on urban extensions seeks to establish the expectations of the council should an urban extension or proposed development come forward on the borough's administrative boundaries.</p> <p>Furthermore, Crawley Borough Council is working closely with its neighbouring authorities to consider the unmet needs of Crawley over the Plan period, including working with Horsham District Council in respect of considering the promotion of the land to the west of Crawley by Homes England.</p>
REP3/003	Henry Smith MP	Policy H8	<p>I am emailing you today to raise objection to the above proposal which would allow construction of a traveller's site at Broadfield Kennels.</p> <p>Since the proposal went public I have had a number of constituents raise concerns over the negative impact to Broadfield, as well as surrounding neighbourhoods, and I agree that this site would not be in the best interests of local, Crawley, residents.</p> <p>I would be grateful if my objection could be formally logged.</p>	<p>This site was allocated in adopted Local Plan, following a long period of site assessments and evidence gathering. A thorough assessment of potential sites undertaken previously and this clearly highlighted there was limited alternative opportunities (only one alternative was considered 'suitable' enough for public consultation in 2013, and was subsequently discounted due to noise and flooding matters).</p> <p>On this basis it was found 'sound' by the Planning Inspector. No further evidence has been submitted to suggest this decision was flawed or that circumstances have changed, to</p>



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<b>Representor/ Representation Reference</b>	<b>Name/ Organisation</b>	<b>Policy/ Para/ Page No.</b>	<b>Comments</b>	<b>CBC Response</b>
				<p>warrant the de-allocation of the site as part of the Local Plan Review.</p> <p>The adopted Policy establishes requirements for access, highways, and AONB. This policy wording is being retained through the Local Plan Review.</p> <p>The site is being retained as a “reserve site”, which means the earliest anticipated point it would become available will be after the first five years of the new Plan period. This is because the updated Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment maintains that there is still no immediate need arising from Crawley’s existing Gypsy and Traveller population, but that a potential need may arise in the future from new households created by these families who chose to take up a travelling lifestyle. On this basis, the dates set out in the Policy have been amended accordingly.</p>
REP22/061	Thames Water	H2	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future infrastructure.</p> <p>The attached table provides Thames Water’s site specific comments from desktop assessments on sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> <li>• What drainage requirements are required on and off site</li> </ul>	<p>Comments and information noted. The current Housing Trajectory shows levels of anticipated developments and timescales for this to be brought forward. However, this only applies to development within Crawley, and needs to be considered against impact from potential wider strategic proposals (west of Crawley etc.).</p> <p>Amendments have been made to the supporting text to Policy IN1 to reflect the comments made.</p>

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<ul style="list-style-type: none"> <li>Clarity on what loading/flow from the development is anticipated</li> </ul> <p>It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.</p> <p>Waste-water/Sewage Treatment Works upgrades take longer to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years to plan, design, obtain approvals and build.</p> <p>(*attached site spreadsheet*)</p>	
REP98/257	Land Planning and Development	H2	<p>On behalf of the landowners at Fieldgate Worth Way I wish to make representations in relation to the Strategic Policy H2; Key Housing Site at Land east of Balcombe Road/Street Hill for 15 dwellings.</p> <p><u>Background</u> My clients own land north of Worth Way but within the Worth Conservation Area and contributed to the consultation document which was approved in 2018. In particular the permission for a single dwelling under Ref : CR/2015/0637/FUL was cited as a good example of how development in the Conservation Area can be accommodated without causing harm to the setting or assets of historic importance. This has also been</p>	<p>Support for allocation noted.</p> <p>This allocated site is sensitive in terms of biodiversity, heritage, landscape and flooding and is subject to policy expectations and the requirement for the council to produce a development brief. The housing number referred to as 15 dwellings in the Local Plan is clearly expressed as a “maximum” figure and the final quantum of development on the site will need to adequately address all of the environmental and planning constraints and opportunities associated with the site specifics, including through far more detailed assessments than the high levels</p>

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>incorporated into the draft development brief for the land at Balcombe Road/Street Hill. Subsequently the principle of building a second house on the land has been accepted on appeal and is the subject of a current detailed application under Ref : CR/2019/0330/FUL.</p> <p><u>National Planning Policy</u> The National Planning Policy Framework (NPPF) first published in in 2012 and subsequently reviewed and re-published has at its heart a presumption in favour of sustainable development.</p> <p>For decision -taking this means: c) approving development proposals that accord with an up-to -date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:</p> <ul style="list-style-type: none"> <li>• The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or</li> <li>• 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.</li> </ul> <p>The preparation of the development brief for this site is at an advanced stage and therefore reinforces the site's inclusion within the Local Plan but any approvals should not be delayed by the review process.</p> <p><u>Local Plan Policy</u> The draft Local Plan has identified the site as a Housing, Biodiversity and Heritage site for 15 dwellings with detailed</p>	<p>previously taken as part of the Local Plan 2015 process.</p> <p>A draft Development Brief has been consulted upon twice and is in the process of being prepared for its adoption as a Supplementary Planning Document.</p>

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			<p>requirements regarding ecological and archaeological assessments. These requirements will be set out in full in a Development Brief.</p> <p>The Council has in Para 12.7 acknowledged that <i>“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 <b>larger housing and high-end market housing</b> is more limited.”</i></p> <p>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 should be identified alongside an annual supply of <b>deliverable</b> sites to provide a five -year supply of housing measured against the local authority’s housing requirement.</p> <p>The land east of Balcombe Road/Street Hill is available and deliverable and subject to an economic viability assessment can form part of the supply – led housing figure over the plan period.</p> <p>Para 12.52 states that the site has a number of heritage and environmental constraints which must be carefully considered and addressed through the design and layout of a development scheme. Therefore, it is acknowledged that development of this site will bring substantial benefits over and above simply providing more housing. This should be therefore reflected in the number of houses approved to offset the considerable abnormal costs which will be incurred. This can be achieved by a design led solution which respects the rural nature of the Conservation Area</p>	

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			<p>whilst maximising the development potential of the site as envisaged in the NPPF.</p> <p><u>Conclusion</u> As an adjoining landowner we support the continued allocation of the land east of Balcombe Road/Street Hill, Pound Hill (deliverable) 15 dwellings. The Local Plan review should continue to support this allocation and through the adoption of a development brief help in identifying the opportunities as well as the constraints to development. As an enabling consent the available developable land should be maximised to accord with the principles of the NPPF whilst respecting the rural nature of the Conservation Area.</p>	
REP120/333	Mole Valley District Council		<p><b>Meeting housing needs</b> MVDC recognises the difficulties in delivering sustainable growth and the challenge of balancing competing environmental, social and economic pressures. We further recognise the physically constrained nature of Crawley. Nonetheless MVDC are concerned that CBC will have an unmet need of approximately 6,475 dwellings over the Plan Period (2020-2035).</p> <p>Three quarters of Mole Valley is within the Metropolitan Green Belt and is therefore heavily constrained. That includes all of the land adjacent to Crawley. In addition, further constraints include the AONB, a SAC, areas prone to flooding and other environmental constraints. MVDC is currently updating its own Local Plan and based on current assessments it is clear that it will have difficulty meeting its own housing need let alone having any spare capacity.</p> <p>Crawley is a functional component of the Northern West Sussex Housing Market Area, which includes Horsham,</p>	<p>The different Housing Market Area (HMA) boundaries are noted – it is recognised that Mole Valley does not form a part of the main Northern West Sussex HMA. This is supported by the most recent evidence gathered as part of the Northern West Sussex Strategic Housing Market Assessment (NWS SHMA) commissioned jointly by Crawley Borough and Horsham District Councils. However, overlaps between the areas are acknowledged.</p> <p>At this point, Crawley is pursuing opportunities to maximise housing development within its own administrative boundaries, through identification of sites (including small sites within its own ownership) and increasing densities. It is considered Crawley is going as far as it can to meet its own needs within the tight administrative boundaries, and maintaining good quality of life</p>

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			<p>Mid Sussex and a small part of the Reigate and Banstead Council areas. Mole Valley does not form part of the same housing market area.</p> <p>On this basis, we do not consider that MVDC should be expected to meet any of CBC's unmet housing need. CBC have not to date requested that MVDC accommodate any of its unmet housing need because of the constraints mentioned above and differences in housing market. It would be helpful if that situation could be acknowledged.</p> <p>Based on current evidence, we do not believe there is any realistic prospect of Mole Valley contributing to the unmet housing or employment land needs of Crawley.</p>	<p>levels for residents, employers and visitors and avoiding negative impacts of 'town cramming'. However, this will not meet the full housing need as required by the standard methodology and unmet need will need to be considered by authorities within the housing market area, as part of their Local Plan Review processes, and potentially beyond should this not then be sufficient alone. There is an acknowledgement in the Local Plan Review that properly planned urban extensions to Crawley may come forward through neighbouring authorities' own Local Plans, and these may then seek to meet unmet development needs arising from Crawley.</p> <p>Mole Valley's physical and policy constraints are acknowledged and will form part of the Mole Valley Local Plan preparation and examination.</p>
REP131/367	Southern Water	Policy H2	<p>Strategic Policy H2 – Key Housing Sites (p140)</p> <p>For information purposes, we would highlight that our assessment of the proposed development sites revealed that there are pipelines under the following sites that will need to be taken into account when designing the proposed developments;</p> <p>Forge Wood, Pound Hill Zurich House, East Park Upper Floors, 7 – 13 The Broadway &amp; 1 - 3 Queens Square, Northgate, Crawley Breezehurst Drive Playing Fields, Bewbush 102 – 112 London Road &amp; 2 – 4 Tushmore Lane 116 – 136 London Road Oak Tree Filling Station, 114 London Road</p>	Noted.

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			<p>Telford Place, Three Bridges County Buildings Land North of the Boulevard Crawley College</p> <p>Easements would be required, the width being dependent on existing pipe sizes and depths. Any easement should be clear of all proposed buildings and substantial tree planting. Developers of these sites should contact Southern Water for further information.</p>	
REP133/371	Arora Property	Policy H2	<p>Thank you for your email and the attached letter of 22 July 2019.</p> <p>You asked specifically about Overline House, Station Way, Crawley which is referred to in Policies H2 and TC3 and the Housing Trajectory and SHLAA. We remain committed to the development and intend to commence works at the earliest opportunity.</p> <p>Currently we have recently submitted the reserved matters application (ref: CR/2019/0602/ARM) in respect of the original outline permission along with a further full application in respect of retention, change of use and extension of Overline House which is yet to be registered.</p> <p>Subject to the planning process, we fully expect the development to be completed within the Council's current Housing Trajectory period 2020-25. Details of the proposed development, viability etc. are contained within the outline application which was registered on 15 August 2019 (Case Officer: Hamish Walke).</p>	Submission to Call for Sites noted.
REP146/432	Resident 4	Policy H2	<p><b><u>Policy H2 Housing</u></b></p> <p>It is proposed that the sports fields in Tinsley Lane be redeveloped for housing.</p>	Tinsley Lane is an allocated site through the adopted Local Plan. This was subject to various stages of public consultation and examination scrutiny. The constraints referred to in the

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			<p>This is Government owned land currently used for recreation and is unsuitable for high density housing due to access and traffic problems as well as the constraints imposed by the proximity to sources of noise and air pollution from the goods yard, the adjacent railway line and the motorway link road.</p> <p>None of these constraints apply to the use for sports and recreation as existing access roads could be used, traffic generation does not coincide with that from the Manor Royal Business District and the use for recreation is totally compatible with the Goods yard, railway and motorway.</p> <p><b><u>PROPOSAL</u></b>  <b>In accordance with Policies OS1 and H2 the existing recreational land east of Tinsley Lane should be protected and designated for sport and recreation only with improvement of the existing facilities for use by local clubs.</b></p>	<p>representation are all ones which were considered in detail as part of this, and the policy has been worded to address these. A Development Brief has been prepared and adopted to support and guide the successful and appropriate development of this site. On this basis the principle has been accepted and it is not being revisited to de-designate for housing.</p> <p>The capacity of each the allocated sites is being reconsidered against the new draft density policy in the Local Plan Review to ensure there is consistency in the Plan and it remains up-to-date in reflecting the government requirements as set out in paragraph 123 of the National Planning Policy Framework.</p>
REP153/478	Home Builders Federation	Policies H1 & H3g	<p><b>Urban extensions</b></p> <p>As part of its planned co-operation with other Borough's policy H1 highlights that the Council is proposing to examine the potential of delivering urban extensions to Crawley with further detail on such considerations provided in H3g. We would support the delivery of urban extensions which will be essential for the Council to deliver in order to meet its housing needs. To deliver these will clearly need agreement with its neighbours and the Council must prior to submitting this plan reach agreement as to where and how these extensions will be delivered. In identifying locations for extensions, the Council should consider the full range of development opportunities on the edge of the urban area from strategic scale extensions to the allocation</p>	<p>Support noted.</p> <p>Duty to Cooperate is an ongoing process and there is a long history of joint working in this housing market area and beyond. The timetables and SA/SEA for each of the other authorities' Local Plan Reviews is important.</p> <p>CBC can only plan sites within its administrative area. This has been fully assessed and there are only small sites left within urban area. There is a potential site immediately adjacent to the north of Langley Green which will be reassessed for its suitability for housing as part of the future work on the North Crawley Area Action Plan.</p>



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			<p>of small sites. Allocating a range of both large and small development sites the Council will be better able to ensure delivery across the plan period.</p> <p>Where Councils focus on a few larger strategic extensions the majority of development will inevitably occur later on in the plan period delaying the potential benefits from any boost to housing supply. Given the Council's economic ambitions for the Borough it will be important for the Council to provide consistent housing growth over the plan period providing the mix of homes that will ensure it is able to support the types of jobs being provided over the plan period. We would therefore recommend that part vii of policy H3g which require urban extensions to be "<i>comprehensive neighbourhoods</i>" is deleted. Well planned smaller developments on the edge of settlements can through good design be integrated into existing neighbourhoods as well as support the long-term sustainability of existing local facilities and to prevent such development opportunities is unjustified.</p>	<p>Disagree – development which could be incorporated into Crawley's existing neighbourhoods within Crawley has been done and anything outside of Crawley's boundaries could create urban sprawl if it is not planned comprehensively. The motorway to the east also causes severance. Any incremental development adjacent to Crawley will prevent proper planning, appropriate urban design/landscaping/movement, and cumulative impacts, including on infrastructure, being considered and could result in creating future problems for the comprehensive development of the sites. Crawley is bringing forward small sites within the borough, (indeed the quantum of housing being delivered within Crawley exceeds the government expectations for 10% to be on sites no larger than 1ha).</p>
REP153/481	Home Builders Federation	Policy H4	<p><b>Future housing mix</b></p> <p>We appreciate the overall flexibility with regard to housing mix provided by this policy and its recognition that housing mix will be dependent on the size and characteristic of the site being developed. However, we do not consider that all sites should be required to provide a mix of homes. Smaller sites of 10 units and less are inevitably less able to secure a mix of housing types and size and as such should be exempt from this policy. We do not consider the housing mix test set out in policy H4 to be necessary or justified. We appreciate that the Council is seeking to ensure that where a site cannot meet the housing mix set out in</p>	<p>Disagree – the evidence and justification for this approach is set out in the SHMA. Previous experience, highlighted in the 2016 housing market mix study, has shown that the reliance on the market to deliver a balanced mix of units has not proved successful, and to ensure the proper cost of this is taken into account in the land valuation stage a clearer policy approach is considered more appropriate. On this basis, it has been taken into account in the expectations for capacity of sites and will be included in the viability assessment.</p>

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			paragraph 12.84 then there is a minimum mix that should be provided. However, where a development cannot meet the required mix then it should be for the developer to determine the nature of the mix that will enable that site to be delivered. We would recommend that the test be deleted.	
REP153/482	Home Builders Federation	Policy H5	<p><b>Affordable housing</b></p> <p>The Council will need to ensure that its affordable housing policy remains viable given the introduction of new policy elements within the local pan such as net biodiversity gain and that it takes account of any additional infrastructure costs that are expected to be funded by new development. Until the impact of these costs on development have been tested it is not possible to say whether a 40% requirement for affordable housing is justified.</p> <p>The policy is not consistent with national policy in that it requires a contribution for affordable housing from all development. Paragraph 63 states that provision of affordable housing should not be sought on “<i>residential developments that are not major development</i>”. No justification is given by the Council for this departure from national policy and therefore H5 must be amended to only require contributions toward affordable housing from major residential development.</p>	<p>The Local Plan is to be subject to a Whole Plan and CIL Viability assessment. The study is in the process of being commissioned. The final Plan will reflect the outcomes of this work.</p> <p>Full justification for maintaining the council's approach to securing affordable housing from small sites is set out in the adopted Affordable Housing SPD Appendix J. The council maintain that due to the exceptional local circumstances which include:</p> <ul style="list-style-type: none"> <li>• the high affordable housing need (739dpa out of the standard methodology figure 752dpa);</li> <li>• the constrained land supply which means only 40% of total housing need is being met within the borough (i.e. at 40% affordable housing levels this means that overall around only 15% of total affordable housing need is being provided for);</li> <li>• the increasing reliance of small sites in the borough to meet a high proportion of the delivery (see response above regarding small sites proportion);</li> <li>• the difficulties in relying on the Duty to Cooperate to meet Crawley's affordable</li> </ul>

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				<p>housing needs outside the borough boundary; and</p> <ul style="list-style-type: none"> <li>the measures provided by the council to address any 'disproportionate burdens' on smaller developers (as set out in the Planning Obligations Annex),</li> </ul> <p>It continues to be justified in seeking affordable housing from all residential developments, including those below the national threshold.</p>
REP153/484	Home Builders Federation	Policy H7	<p><b>Self-build housing</b></p> <p>The HBF is supportive of the planning system supporting self-build homes but we are concerned that Council's seeking to achieve this in a way that will merely change the manner in which homes are delivered and not provide additional supply. As such we do not consider the Council's top down policy mechanism to meet its duty with regard to the delivery of self-build plots to be sound. Whilst PPG suggests using policies in local plans to support the delivery of self-build plots it also proposes in paragraph 57-025 other mechanisms including:</p> <ul style="list-style-type: none"> <li>Councils using their own land if available and suitable for self-build and custom housebuilding and marketing it to those on the register;</li> <li>Engaging with landowners who own sites that are suitable for housing and encouraging them to consider self-build and custom housebuilding and facilitating access to those on the register where the landowner is interested; and</li> <li>Working with custom build developers to maximise opportunities for self-build and custom housebuilding.</li> </ul>	<p>Crawley has a constrained land supply and there are limited options for these sites. The borough has additional competing land requirements including for employment and open space and these are as critical as housing. The Local Plan only looks at what planning system can do within the administrative boundaries of the LPA.</p> <p>Outside of this remit, the Duty to Cooperate discussions will take place, particularly in terms of unmet needs arising from Crawley and the potential for any urban extensions to include meeting the needs of self-builders in line with government expectations and policy. In addition, the council may consider to undertake a corporate approach separately in relation to its own land ownership. This would then be considered as part of the windfall element and assessed against the policies in the Local Plan accordingly.</p> <p>Additional evidence relating to the needs associated with self-build is provided by the SHMA. However, the council is mindful of the</p>

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			<p>We could find no evidence as to whether the Council has considered any of these other suggested approaches. We would suggest that a more appropriate approach would be for the Council to state that it will work with landowners to secure the provision of self-build and custom build plots on appropriate sites. In particular we would expect to see the Council seeking bring forward new sites specifically aimed at self and custom-build development that will boost supply.</p> <p>Furthermore, we are concerned that self-build register does not provide an effective assessment of the demand for self-build plots. It is easy to register as a self-builder and without proper assessment as to an individual's ability or commitment to self-building there is a real risk that self-build plots will remain vacant. There is also a risk that individuals register on more than one list inflating needs across a number of adjacent authorities further inflating needs across a much wider area. As such paragraph 2a-017 of PPG requires Councils to assess and review data held on registers to ensure that the evidence remains accurate. In addition, paragraph 57-011 of PPG considers it necessary to additional data to understand the need for this type of housing in future and to make reasonable assumptions and to avoid double counting. We would therefore suggest that the Council reviews its self-build register and considers other evidence to confirm whether or not it provides an accurate assessment of the demand for such plots.</p> <p>Finally, we support the policies approach to the release of self-build plots back to the developer. Such mechanisms are essential to ensure that unsold plots do not delay the delivery of new homes.</p>	<p>government expectation for the delivery of serviced, self-build plots to match that on the self-build register.</p> <p>Support for the release of unsold plots noted.</p>

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REP155/505	West Sussex County Council	Policies H1 & H2	<p><b>WSCC Highways</b>  <b>H1: Housing provision and H2: Key housing sites</b>  It is unclear at present how much of the net housing provision will be over and above the sites already allocated and considered in the previous transport assessment. Reference to H2 Key Housing Sites does make it clear that the contribution of existing sites is significant. Transport study work is required to consider this further and to ensure that the transport package provided will continue to support the network performance until the end of plan year of 2036, including identification of any further transport mitigation schemes or amendments to design of those transport schemes associated with the adopted Local Plan yet to be delivered.</p>	The transport study work is to be undertaken with WSCC as a lead partner in commissioning. This will set out the additional sites beyond those already included in the reference case (and above those already allocated in the adopted Local Plan). The Local Plan at the point of submission will reflect the outcomes of this study.
REP155/510	West Sussex County Council	Policy H3g	<p><b>WSCC Highways</b>  <b>H3g: Urban Extensions</b>  Transport study work is currently underway in the neighbouring district of Horsham and there is potential for a joint approach to consider this issue further.</p>	On-going joint working, through the Duty to Cooperate and across administrative boundaries, is welcomed. It is anticipated that the transport study work in the neighbouring authorities will form part of transport modelling and will be reflected in the final draft Policy.
REP155/522	West Sussex County Council	Policy H8	<p><b>Countryside</b>  WSCC own the Buchan Country Park which although in Horsham DC area is located in south east part of the CBC, bordering land to south of Broadfield in the High Weald AONB. Buchan Country Park is also referred to in the plan as the Country Park. Specific comments are as follows:  <b>Policy H8 Gypsy, Traveller and Travelling Showpeople Sites:</b> WSCC welcome the stated aim in reasoned justification 12.110 that 'The council will continue to search for and analyse the potential for alternative sites as factors change over the Local Plan period'. WSCC regard the</p>	Acceptance of allocated site noted.

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			current location of the potential settlement to not meet the set assessment criteria, as it is located within the High Weald AONB and outside the current Built-Up Area Boundary but have previously accepted it's inclusion after discussion with CBC providing appropriate mitigation stated is included in any planning application.	
REP158/538	Resident 5	Policy H3g	<p>I am writing to express my utter sadness and horror at the Homes England proposal for the development of the west of Ifield. As a resident of this area for over 30 years I have appreciated and enjoyed this rural area and hoped it would be there for years to come for others to enjoy. From my own garden I have witnessed the abundance and diversity of wildlife (including, deer, bats, foxes, badgers, birds of prey, slow worms, snakes and many other mammals and birds that would be massively harmed by these proposals. We have already endured mess and noise for several years for housing developments forced on us at appeal despite being rejected by Horsham and Crawley council.</p> <p>I do not understand why the destruction of this rural area is being considered now when Horsham and Crawley Council have stated they have already allocated land to fulfil their building obligations until 2031 and 2030 respectively.</p> <p>Why would anyone want to destroy a well-used and important asset like Ifield golf course for housing and then say in the plans they are going to include 50% open spaces. Why not keep the golf course.</p> <p>How long can we keep adding huge neighbourhoods to existing towns when it is obvious they have already grown too large to cope with the extra population? The whole area has become more congested and every conceivable service stretched to the limit. Adding a school and the odd</p>	<p>Comments noted. The land promoted by Homes England is located within Horsham and will be considered as part of the Horsham District Plan review (including being assessed as part of their Sustainability Appraisal and other supporting evidence documents and subject to public consultation and independent examination). The Horsham Local Plan Review timetable can be found at:  <a href="https://beta.horsham.gov.uk/planning/planning-policy/local-development-scheme">https://beta.horsham.gov.uk/planning/planning-policy/local-development-scheme</a></p> <p>However, the Crawley Local Plan Review acknowledges that development on the edges of Crawley's administrative boundaries has taken place over the years to varying degrees of involvement, and agreement, of Crawley Borough Council. In such cases, much of the impact on infrastructure and strategic facilities and services falls on Crawley.</p> <p>Whilst Crawley Borough Council is not able to direct development outside of its administrative area, Crawley's proposed draft policy on urban extensions seeks to establish the expectations of the council should an urban extension or</p>

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			<p>shop in the plans is in no way sufficient to mitigate this. Adding a relief road will only encourage more traffic and development until Crawley and Horsham merge into a massive urban sprawl. What ever happened to the Strategic Gap?</p> <p>The Illustration of the development produced by Homes England produces more questions than answers as there are no landmarks or road names on it. Members of the public, like me, look at the map to see how they might be affected and are unable to determine the position of their property or any major landmark.</p> <p>To lodge any opposition to these proposals has become so confusing for the general public, it probably puts many people off submitting their objections. Currently there are, or about to be, consultations from Crawley Council (which doesn't mention the proposal), Homes England, Horsham Council &amp; Ruser Parish Council all concerned with this development. The sheer time involved submitting objections and attending meetings deters the public entering the debate especially when, as in the past, all their input is overruled on appeal at a single meeting by a Government Inspector, Hardly democratic.</p> <p>I know this development would be in the Horsham District but it would have a great effect on the Crawley side of the border. I urge Crawley council to strongly object to this hugely damaging proposal. As you drive up Ruser Road across the Crawley, Horsham Boundary there are Horsham Council signs saying 'Please protect this rural area'. Let's hope they do.</p>	<p>proposed development come forward on the borough's administrative boundaries.</p> <p>Crawley has a high housing need, which cannot be met in full within the administrative boundaries. On this basis, the Local Plan Review continues the adopted Local Plan's accepted approach for taking a constrained land supply approach to housing delivery, with the remaining unmet need to be met in sustainable locations, preferably within the Northern West Sussex housing market area. Furthermore, this Local Plan Review covers an additional five year period (2020-2035) beyond that covered by the adopted Local Plan (2015-2030) and for that there is a continuation of growth of housing need over those additional years which needs to be met as part of this Local Plan Review in accordance with government requirements. This is further increased by the national changes to how housing need is to be calculated.</p> <p>Crawley Borough Council is working closely with its neighbouring authorities to consider the unmet needs of Crawley over the Plan period, including working with Horsham District Council in respect of considering the promotion of the land to the west of Crawley by Homes England.</p>

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REP162/555	Sussex Ornithological Society	2.32, para. 12.17, 3.1	<p>The Sussex Ornithological Society (SOS) is the county bird club. We promote the recording, study, conservation and enjoyment of birds in Sussex. We have over 1900 members and a database of nearly 5 million bird records in Sussex. We publish the annual <i>Sussex Bird Report</i> and in 2014 wrote <i>The Birds of Sussex</i>, a 614 page avifauna which was published by the British Trust for Ornithology and was judged the BB/BTO Best Local Bird Atlas 2007-17. More information about us can be found on our website <a href="http://www.sos.org.uk">www.sos.org.uk</a></p> <p>We welcome this opportunity to participate in the early engagement consultation on the draft Crawley Local Plan 2020-2035.</p> <p><b><u>Draft Local Plan</u></b> <b><u>Housing: Section 2.32 and Section 3</u></b></p> <p>1. Paragraph 3.1 states that the NPPF confirms that one of the three dimensions of Sustainable Development that Crawley's Planning system has to support is an environmental dimension <i>.....to contribute to protecting and enhancing our natural, built and historic environment, including making effective use of land, helping to improve biodiversity.....etc</i></p> <p>2. Indeed it is a key part of the NPPF guidelines that all development should show a net gain in biodiversity, and this response from the SOS takes this into account.</p> <p>3. A fundamental assumption made by Crawley for this Local Plan is expressed in 12.17 (p.134) "<i>As the land within Crawley is constrained, it is assumed that the adjoining authorities to Crawley will be asked to meet 60% of Crawley's housing need</i>".</p>	<p>Crawley Borough Council is concerned this representation does not value the importance of open space and proximity to urban wildlife, sufficient infrastructure, and good planning and design, for the population within Crawley.</p> <p>The wording in paragraph 12.17 (now 12.16) refers to the unmet need arising from Crawley being 60% as <b>anticipated</b> and is not assumed. Policy H1 confirms that the housing delivery figure is a minimum figure and the council will positively consider all reasonable opportunities for meeting housing needs within the borough.</p> <p>A substantial proportion of the new developments coming forward are flatted development which meet or exceed the density standards set by the Local Plan Review. 80% of the development within the Local Plan is coming forward through the new neighbourhood (Forge Wood) which was granted by appeal and is subject to a specific housing delivery number, much of which is being built at high density levels to avoid ancient woodland and provide sufficient open space required by Sport England; and the Town Centre, which are high density, flatted schemes.</p> <p>However, developers in Crawley must be mindful of the restrictions placed on high-rise buildings due to Gatwick's aerodrome safeguarding.</p> <p>In addition to this, the planned New Town neighbourhoods' character must be considered for any development. The planned New Town layout and age also means there is limited</p>



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			<p>Why is there a fundamental assumption that Crawley will not fulfil their housing supply target by building new homes at a high enough density so as to enable all 11,281 to be built within their boundary? Put simply if the average new home in this Local Plan is going to be two stories high so that only 40 % of them can be built in Crawley, then if they were five stories high all 11,281 dwellings could be built in Crawley instead. And the taller you build some dwellings the lower the residual dwellings would need to be.</p> <p>4. No attempt appears to have been made to consider building at higher densities than those proposed – instead the assumption appears to be that it is essential that the current character of Crawley is maintained without considering what the implications of that assumption on the proposed overflow areas are.</p> <p>5. SOS is alarmed by the potential areas shown in the map in section 2.32 as to where this overflow might go. The particular part of the High Weald AONB on the east side of the M23/A23 is one of the very best areas for woodland birds in all of Sussex, with significant numbers of Section 41, Schedule 1 and red-listed species of high conservation concern recorded using this area in the last 10 years - full details of these concerns are laid out in Appendix 1.</p> <p>Crawley's proposals for overflow appear to threaten this area. The proposals suggest that it is acceptable for the character of the High Weald AONB in Mid Sussex DC to be substantially degraded in order to accommodate Crawley's overflow. We do not accept that the High Weald AONB should be degraded just because Crawley do not wish to consider building homes at a higher density.</p>	<p>brownfield land available within the neighbourhoods and sites which are left are subject to restrictions such as ancient woodland or flooding.</p> <p>The Local Plan Review has introduced policies designed to maximise densities with minimum space standards. The Local Plan is allocating sites on playing fields, education land, ecologically and historically important sites, and very small sites within the built-up neighbourhood areas. However, based on the actual land supply available for building, this is still not enough to get to 11,000.</p> <p>The "At Crawley" map shows the existing planned developments coming forward adjacent to Crawley's boundaries rather than identifying any areas considered acceptable for any new development, the text around this plan has been amended to clarify the purpose of image – it is not intended to be an "overflow map", instead it is just showing areas where CBC would to be engaged with should development be coming forward on its boundary, and Policy H3g sets out the council's expectations for such sites. It is accepted that it is for the relevant neighbouring authorities to consider where best to direct this housing need. However, the map reflects previous circumstances which have led to development on boundary, with and without CBC support.</p>

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			<p>We feel that full consideration must be taken into account of the biodiversity impact of the overflow strategy, in order to fulfil the NPPF requirement to achieve a net gain in biodiversity. Failure to do this means that Crawley are failing to support the environmental objective as laid out in Section 3.1 of the Plan.</p> <p>6. To be clear SOS will oppose any development proposals to build Crawley overflow in the High Weald AONB. It is fundamentally wrong and will inevitably seriously harm biodiversity.</p> <p>7. The overflow plan also suggests that the character of Horsham DC will be further degraded by having to accept Crawley's overflows.</p>	<p>The site in the AONB at Pease Pottage for 600 dwellings was approved by Mid Sussex District Council with an outstanding objection from Crawley Borough Council on the grounds of the AONB and disconnection to Crawley's infrastructure and services. At no point during the preparation of the adopted Crawley Local Plan (2015-2030) was it suggested that any unmet need would be considered overflow from Crawley and would be met in the AONB.</p> <p>Net Gain of Biodiversity and impact on landscape character on sites outside the borough's administrative boundaries is a matter for the relevant Local Planning Authority to consider as part of their Planning processes (including Sustainability Appraisals).</p>
REP162/558	Sussex Ornithological Society	Policy H1	<p><b><u>Chapter 12 – Housing</u></b>  11. <u>Policy H1</u>  Further to the points made in 1 to 9 above, we disagree with the whole of Policy H1</p>	Objection noted.
REP162/559	Sussex Ornithological Society	Policy H2	<p>12. <u>Policy H2</u>  Further to the points made in 1 to 9 above, we do not agree with the numbers of dwellings quoted in this policy.</p> <p>13. Crawley does have the space to build all its 11,281 homes within the Borough boundaries – it is just choosing not to do try and do this, and no serious attempt is made to try and explain or justify why. Instead it is assumed that it will be acceptable for the character of Mid Sussex and Horsham to be degraded by building Crawley's overflow there – presumably ad infinitum.</p>	<p>Objection noted. As set out above, the council considers the Local Plan Review takes every opportunity to maximise housing delivery within the borough's administrative boundaries and contends there has been no stone left unturned in looking for housing opportunities.</p> <p>Biodiversity net gain is picked up in Policy GI2. The Policy H2 requirements relates to one site only which is of ecological value and was allocated by the Planning Inspector of the last Local Plan as part of the examination process.</p>

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			<p>14. In order to fulfil the NPPF guidance that developments should result in a net gain in biodiversity, we suggest that on page 141 the last paragraph of policy H2 in the box ("<i>Detailed ecological and archaeological assessments etc....</i>") be deleted and the following wording replace it as follows:</p> <p><b><i>Detailed ecological assessments based on the latest ecological records and up to date surveys must be carried out on all new developments and the impacts on the loss of biodiversity must be assessed. Proposals need to be put forward that will either result in gains to biodiversity being proposed so that developments will deliver an overall net gain in biodiversity, or mitigation proposals (perhaps involving another site) need to be put forward that will achieve a net gain in biodiversity. Moreover, the proposals need to ensure that the net gains in biodiversity will be permanent, all other things being equal. For example, if planting to increase pollinator plants is proposed it is essential that plans are included to maintain and renew the plants over the long term.</i></b></p> <p>15. Replacement wording would also be needed to cover the archaeological content of the paragraph at the end of page 141.</p>	Policy GI2 will also apply to this housing site as part of the planning application process. The proposed wording will be reviewed and considered for inclusion in the supporting text or policy for Policy GI2.
REP165/570	Neame Sutton Ltd. on behalf of Danescroft (RLP Crawley) LLP	Policy H1	1.1 Neame Sutton Limited, Chartered Town Planners, is instructed by Danescroft (RLP Crawley) LLP ("Danescroft") to prepare and submit representations in relation to the Regulation 18 consultation version of the Crawley Local Plan 2035 ("the Plan").	

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			<p>1.2 This document sets out Danescroft's Representations on the Plan and deals with the following specific matters:</p> <ul style="list-style-type: none"> <li>• Consideration of the correct Housing Need and Housing Requirement within the Plan in the context of the Housing Supply identified by the Council; and,</li> <li>• Site-specific representations in relation to Danescroft's promotion site at Steers Lane.</li> </ul> <p><u>2.0 Housing Need, Housing Requirement/Target and, Supply</u></p> <p>2.1 As a starting point it is important to note that the Plan is being prepared in the context of the current National Planning Policy Framework 2019 ("the Framework").</p> <p>Housing Need:</p> <p>2.2 The basis for the calculation of the Housing Need is therefore set out in the Framework and corresponding National Planning Practice Guidance ("PPG"), namely, the Government's Standard Method.</p> <p>2.3 The Council has correctly identified that it must apply the Standard Method to calculate its Housing Requirement as set out at Paragraph 12.11 on Page 133 of the Plan.</p> <p>2.4 Whilst Danescroft doesn't raise any specific concerns with the way in which the Council has set out the Standard Method calculation for the Borough it is important to highlight that this calculation will need to be reviewed as the Plan progresses to take account of any changes to the inputs, particularly in relation to the workplace-based earnings ratio ("the Affordability Ratio"). It may therefore be the case that the Housing Need figure calculating using the Standard Method will change as the Plan progresses.</p>	<p>Comments regarding the Standard Methodology noted.</p>

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			<p>2.5 For present purposes Danescroft accepts the Housing Need figure of 752 dpa. It is important to highlight that this represents a significant uplift when compared with the current Local Plan Housing Target figure of 340 dpa. The Council therefore needs to take decisive action through the production of this Plan to address that need.</p> <p>2.6 Danescroft notes that the Council does not appear to have quantified its affordable housing need. This is considered to be a vital component of the Plan particularly given the approach the Council appears to be taken in relation to its Housing Requirement/Target for the Plan.</p> <p>Housing Requirement/Target:</p> <p>2.7 Having established its Housing Need the Council proceeds to identify the Housing Requirement that it intends to meet in the Plan. This is where the problems with the Council's approach to the delivery of housing emerge.</p> <p>2.8 The Council considers that the maximum it can deliver over the Plan period amounts to only 40% of the total Housing Need. This leads to a shortfall in provision from the outset of some 6,475 dwellings.</p> <p>2.9 In addition to this staggering level of planned shortfall the Council has confirmed that in the context of the adopted Local Plan wherein an unmet need of some 5,000 dwellings was created and was anticipated to be addressed by neighbouring local planning authorities (principally Horsham and Mid-Sussex Districts), in fact only 3,150 dwellings have been planned for by Horsham and Mid-Sussex Districts.</p>	<p>Affordable Housing Need is now identified in the supporting text of Policy H5.</p> <p>The council is in on-going discussions and joint evidence gathering with the neighbouring authorities and as part of the Duty to Cooperate, matters such as unmet needs above those already covered by the adopted Local Plans will be addressed. CBC is confident that, based on previous experience, this will be productive and effective. The neighbouring authorities are reviewing their own Local/District Plans at</p>

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			<p>2.10 This means that the current adopted Local Plan falls short of meeting its identified housing need (insofar as unmet need is concerned) by 1,850 dwellings.</p> <p>2.11 Whilst it is acknowledged that the Standard Method is intended to take account of past under delivery the fact remains that the current adopted Local Plan has fallen short of what was required of it in terms of meeting the full Objectively Assessed Need for housing.</p> <p>2.12 Set against this background the Council is now actively promoting the creation of an even higher level of unmet need. To compound this the application of the Standard Method by the neighbouring authorities, particularly Mid-Sussex and Horsham will almost certainly mean that their capacity to accommodate any unmet need arising from Crawley will be reduced if not removed altogether. Other neighbouring authorities, such as Tandridge, are at Examination with a Plan that proposes to fall well short of meeting their own Objective Assessed Need for housing.</p> <p>2.13 The Council appears to allude to the fact that it agrees with this assertion at Paragraph 12.39 of the Plan.</p> <p>2.14 As a consequence this Council should be taking further steps to ensure that all reasonable opportunities for new housing within the Borough are explored and maximised in order to limit the scope of unmet need. Instead the Council appears to be taking a rather lesa fair approach that simply applying a similar approach to that of the adopted Local Plan without proper assessment of supply sources, leading to a significant level of unmet need that has little or no prospect of being met anywhere else.</p>	<p>differing timescales and the Plan periods are different. However, the joint working reflects the acknowledgement of this.</p> <p>All capacity figures established for the allocated sites are indicative (with the exception of Land East of Balcombe Road/Street Hill where the figure is stipulated to be a maximum figure). On this basis, higher housing numbers can be provided subject to detailed assessment and in line with other policies of the plan.</p> <p>We have made further amendments to the Housing Requirement, SHLAA, and Housing Trajectory reflecting responses to the Regulation 18 consultation and call for sites and our own further assessment of sites. On this basis, we have increased the proposed housing requirement to over 5,355 (in excess of the current adopted requirement), through a combination of addition of new sites and increases to the indicative yield of others.</p> <p>The capacity figure is based on an assessment of the site which does reflect a realistic expectation of a Local Plan policy-compliant scheme and anything significantly different would need to be very clear, setting out justification and evidence to support that all policies requirements can be achieved within a site layout.</p>

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			<p>2.15 The Council's approach as set out in the Plan is therefore completely unsound in that it fails to plan positively, it is not effective and certainly does not accord with the Framework. Furthermore, there is a question over the effectiveness of the Council's cooperation thus far with its neighbours under the Duty to Cooperate.</p> <p>2.16 As a further fundamental problem with the Council's approach the Sustainability Appraisal ("SA") that accompanies the Plan appears to assess the wrong Standard Method figure for the Borough as Option 14. That being the case the Council hasn't even tested meeting the Housing Need figure in full. It cannot possibly be the case therefore that the chosen option can be relied upon as the most sustainable. Equally, the Council has not identified the sustainability implications of its preferred option alongside the inevitable unmet need not being delivered elsewhere.</p> <p><u>Housing Supply:</u></p> <p>2.17 As set out above, Danescroft considers that the Council has not properly assessed its sources of supply and in particular no consideration, beyond a replication of the assessment undertaken to inform the adopted Local Plan, appears to have been done in relation to previously identified/allocated sites that are to be carried forward into the Plan. On this basis Danescroft has not undertaken its own detailed assessment of the Council's Housing Trajectory at this stage.</p> <p>2.18 A prime example of this is Danescroft's land interest at Steers Lane, which is explored in more detail in Section 3 below.</p>	<p>The Sustainability Appraisal has been amended to include the option of meeting the overall need identified by the Standard Method in full, as well as the option of raising the requirement to what would be required to meet Crawley's affordable housing need (on the assumption of a 40% affordable requirement).</p> <p>This site is currently being considered by Appeal.</p> <p>The council's position in relation to this site is set out in response to REP165/571 below.</p>

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REP165/571	Neame Sutton Ltd. on behalf of Danescroft (RLP Crawley) LLP	Policy H2	<p><b>3.0 Site-Specific Representations in Relation to Land at Steers Lane, Crawley</b></p> <p>3.1 The Council's evidence base for the Plan insofar as it relates to housing supply comprises the Strategic Housing Land Availability Assessment ("SHLAA")(July 2019).</p> <p>3.2 That document has assessed Danescroft's promotion site at Steers Lane under Site Reference 17 (Pages 42 – 43). The site is already included as an allocated Broad Location in adopted Local Plan Policy H2 and the Council proposes to include the site as a Housing Allocation in this Plan under Policy H2.</p> <p>3.3 The assessment in the SHLAA concludes the site is Suitable, Available and Achievable. The assessment then refers back to the adopted Local Plan and simply reiterates the capacity at 75 no. dwellings for delivery in 2025.</p> <p>3.4 This conclusion is drawn by the Council despite the knowledge that Danescroft has progressed an Outline Application for up to 185 no. dwellings on part of the site (Area A on the plan attached at Appendix 1) and has made it clear to the Council the site would be delivered as soon as an implementable planning consent is in place.</p> <p>3.5 Danescroft has recently lodged an Appeal in relation to the failure of the Council to determine its Outline Application within the statutory time period. It is clear therefore that the site promoter wishes to deliver the site at the earliest opportunity. Despite the fact that a non-determination Appeal has become necessary Danescroft considers the site could deliver completions as early as 2022.</p>	<p>With specific reference to the Steers Lane site, there is an outstanding Appeal on this which may be determined ahead of the Local Plan's adoption. However, through the application of the new Gatwick Airport Masterplan contours for an additional runway to the south, and taking into account the new Environmental Health noise advice, as reflected in the draft Policy EP4, it is no longer considered consistent or appropriate for this site to be an allocated Key Housing Site and has been removed from the draft Local Plan. As proposed Policy EP4 lowers the threshold for Unacceptable Adverse Effect from aviation transport sources to 60dB LAeq, 16hr. The site falls entirely beyond the 60dB threshold for the summer day wide-spaced runway 2040 contour, as shown in the Local Plan Noise Annex and Plan 31 of the Gatwick Masterplan 2019. As such the site cannot be considered suitable for housing development from the perspective of the updated Plan, and the Housing Trajectory is amended to reflect this. This site may be reconsidered as part of the work on the North Crawley Area Action Plan, should there not be any robust evidence to support a future additional runway south of Gatwick Airport. In addition, if the current appeal is successful, under the current adopted Local Plan policy, it will become a committed site whilst a permission is extant.</p>



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			<p>3.6 The evidence base that underpins the Outline Application/Appeal demonstrates that a scheme of up to 185 no. dwellings can be delivered in a policy compliant manner on Area A of the site (see Application Ref: CR/2018/0894/OUT). Despite this evidence the Council has failed to update its previously flawed assessment of the site that led to the adopted Local Plan identifying it for 75 no. dwellings.</p> <p>3.7 It is clear that a scheme of 75 no. dwellings on only half of the site (Area A) represents a gross underutilisation of the land and equates to a density of only 13.4 dpha (based on Area A on the plan attached at Appendix 1). If the whole site area is taken into account, as appears to be the case in the SHLAA assessment, then the density falls to 9 dpha, which is totally unacceptable and cannot be considered to comprise positive planning.</p> <p>3.8 This is a key example of where the Council has failed to properly assess the capacity of its available land supply and therefore has not taken the opportunity to make best use of this valuable resource in order to meet as much of its identified housing need as possible.</p> <p>3.9 It is important to note that the difference between the Council's proposed capacity for the site and that advanced by Danescroft also has a profound impact on the contribution the site can make in relation to affordable housing. The Council's proposed capacity would deliver up to 30 no. affordable dwellings (applying the current adopted Local Plan Policy for affordable housing at 40%), whereas Danescroft's proposal will deliver up to 74 no. affordable dwellings. This represents a 247% increase in affordable housing delivery from a single site.</p>	

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			<p>3.10 All of the above applies only to one half of the promotion site (Area A). The remainder of the land (see Plan attached at Appendix 1) has the capability to deliver a further 100 no. dwellings including 40 no. affordable dwellings. This part of the site (Area B) is situated above the noise contour identified in the Noise Annex to the adopted Local Plan relating to the proposed second runway at Gatwick Airport. In this respect the Council has previously discounted any residential development on this part of the site as a matter of principle.</p> <p>3.11 The Council does however recognise that the Government's aviation policy is changing and in all likelihood a second runway at Gatwick will not come forward. Should that prove to be the case then Area B would present an ideal opportunity for accommodating a further 100 no. dwellings.</p> <p>3.12 Notwithstanding that the position regarding aviation noise impact has also changed since the current contours were established (based on ERCD Report 0308 published in 2003). The attached technical note (see Appendix 2) prepared by Aecom confirms that when the more up-to-date assessment of aviation noise (based on Airport Commission Local Noise Assessment 2014) is taken into account Area B can come forward now for residential development without resulting in unacceptable impact on future occupiers of the dwellings.</p> <p>3.13 On this basis the Council should be assessing the potential of Area B within its SHLAA to establish the contribution that it can make to helping meet the significant housing need in the Borough.</p>	

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			<p>3.14 Based on Danescroft's analysis the Council's assessment of the site (Areas A and B combined) underscores its capacity and contribution to meeting local Housing Needs by some 210 no. dwellings.</p> <p>3.15 The Council therefore needs to start its SHLAA process again, particularly in relation to Danescroft's promotion site, to properly consider the potential supply from all suitable and available sources. Only then can the Council properly identify the extent of the local Housing Need that can be accommodated and in turn the level of unmet need that should be dealt with under the Duty to Cooperate.</p> <p><b>*Appendices Enclosed*</b></p>	
REP167/573	Resident 6		<p>With regards to building new homes in Crawley to accommodate the growing population, please prioritise building any new homes within Crawley on brownfield sites before destroying the previous remaining bits of countryside that we have in Sussex to build new homes. Please also keep in mind that there are many vacant homes in Crawley, please put resources in bringing families in to vacant homes before building new homes. Please do not build any more 'executive homes' - the most pressing need is for affordable and social housing. Please also make sure developers build on land that has already had the green light for development rather than allowing developers to land bank.</p> <p>Sussex is falling way behind on its environmental responsibilities, it is absolutely critical that all other options are exhausted before building in the countryside.</p>	<p>46% of all housing development coming forward within Crawley is to be in the town centre. In addition, the council maintains a Brownfield Land Register which identifies sites on brownfield land which could be suitable for housing development.</p> <p>The need for housing mix, in terms of tenure and size/type of dwelling is identified in the Strategic Housing Market Assessment and set out in Policy H4.</p> <p>In terms of meeting the affordable housing need, this is something the council takes seriously and, due primarily to its own build programme, the borough is currently meeting the 40% target of affordable housing from all housing developments with planning permission. This figure is maintained in the Local Plan Policy H5.</p>

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				The importance of the countryside and environmental issues are recognised. Any development of land outside of Crawley's administrative boundaries is to be subject to detailed assessments as part of neighbouring authority's Local Plan Review and planning processes, and is beyond the scope of the Crawley Borough Local Plan. However, the importance of open space and proximity to urban wildlife, sufficient infrastructure, and good planning and design, for the population of Crawley is also strongly advocated as part of sustainable development.
REP169/588	Judith Ashton Associates on behalf of A2Dominion Homes Ltd.	Policy H2	<p>I write with reference to the above. I act for A2Dominion Homes Ltd who have an interest in the land at Longley Building, East Park Crawley, a site identified in Policy H2: Key Housing Sites of the Reg 18 Draft Local Plan as a deliverable site within the first five years of the Plan (2015/16 – 2019/20).</p> <p>Having reviewed the Consultation Draft Local Plan July 2019 and associated Sustainability Appraisal/Strategic Environmental Assessment Scoping Report and Draft Report we note that the Reg 18 Plan calculates Crawley's total annual housing need, based on the Standard Methodology Figure 2014-based Household Projections, calculated June 2019, to be 752 dwellings per year (11,280 dwellings over the plan period (2020-2035)).</p> <p>Policy H2: Housing Provision indicates that: <i>'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'.</i></p>	<p>Site representations noted.</p> <p>Comments regarding the borough's housing need are noted.</p> <p>The council is in on-going discussions and joint evidence gathering with the neighbouring authorities and, as part of the Duty to Cooperate, matters such as unmet needs above those already covered by the adopted Local Plans will be addressed. CBC is confident that, based on previous experience, this will be productive and effective. The neighbouring authorities are reviewing their own Local/District Plans at differing timescales and the Plan periods are different. However, the joint working reflects the acknowledgement of this.</p> <p>A comprehensive reassessment of all capacity figures for the allocated housing sites has been undertaken in line with the draft density policy. All</p>

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			<p>The above means the Plan will make provision for a minimum of 4,806 net dwellings in the borough over the period 2020 to 2035. Which means there will be a remaining unmet housing need, of approximately 6,475 dwellings. This is over 60% of the housing requirement.</p> <p>Para 11 of the NPPF (2019) is clear in that <i>'plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change'</i> Whilst Paragraph 16 (b) indicates that plans should <i>'be prepared positively, in a way that is aspirational but deliverable'</i>; and paragraph 35 in identifying the tests of soundness makes it clear that for a plan to be 'sound' it has to be: <i>'Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development'</i>.</p> <p>The NPPF and PPG are also both clear that the responsibility for meeting the local housing need (LHN) will remain with the relevant authority – in this case Crawley Borough Council until and unless any neighbouring authorities agree to accommodate any unmet need. Given the scale of the unmet need and the severity of the housing market pressure within the Housing Market Area (HMA), it is critical that no element of the housing need is permitted to 'fall through the cracks' between that which can be accommodated within Crawley and that which is to be met by neighbouring areas. The table contained at para 2.29 of the Reg 18 Plan demonstrates that all of the authorities within the Northern West Sussex Housing Market Area will,</p>	<p>capacity figures established for the allocated sites are indicative (with the exception of Land East of Balcombe Road/Street Hill where the figure is stipulated to be a maximum figure). On this basis, higher housing numbers can be provided subject to detailed assessment and in line with other policies of the plan.</p> <p>We have made further amendments to the Housing Requirement, SHLAA, and Housing Trajectory reflecting responses to the Regulation 18 consultation and call for sites and our own further assessment of sites. On this basis we have increased the proposed housing requirement to over 5,200 (in excess of the current adopted requirement), through a combination of addition of new sites and increases to the indicative yield of others. The indicative yield of Longley House has been increased to 100 dwellings as part of this work.</p> <p>The capacity figures are based on an assessment of the site which does reflect a realistic expectation of a Local Plan policy-compliant scheme and anything significantly different would need to be very clearly setting out justification and evidence to support that all policies requirements can be achieved within a site layout.</p>

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			<p>through the standard methodology, experience a significant uplift in their housing requirement. It cannot therefore be assumed by Crawley BC that the other authorities within the HMA will be able to assist to the extent they have in the past.</p> <p>Thus, whilst Crawley may be subject to constraints in finding land for new development, the proposed shortfall is significant, and the Council should rigorously assess all opportunities to meet their housing need before looking to their neighbours to assist through the duty to cooperate. To fail to do so would mean that the plan is effectively unable to address a key tenant of the plans vision as set out on p16 i.e. <i>'Delivering Housing to meet Needs and Affordable Homes for Crawley and Reducing Homelessness'</i></p> <p>In demonstrating that they have rigorously assessed all opportunities to reduce their unmet need CBC will need to demonstrate that they have looked at both increasing the intensity/ density of development within the urban areas and reviewing the constraints to development elsewhere by revisiting their site assessments, and for example reviewing their assumptions on the development potential of particular sites (including physical and policy constraints). Only by doing this can the Council truly show that it has positively sought opportunities to meet the development needs of the area in line with para 11 of the NPPF.</p> <p>In the context of the above one of the first things we would suggest the council do is review the development yield expected from the town centre and edge of centre sites. Site's such as the land at Longley Building, East Park, Crawley, have in our opinion significantly greater capacity than currently suggested. By reviewing the density of</p>	

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			<p>development within areas such as this, and we would suggest the councils parking aspirations – esp. when one is so close to the town centre; the council could go some way in reducing its unmet housing need. Furthermore, whilst appreciating the aspirations enshrined in policies CD2, CD4(b), CD5, CD6, H3, H3a, H3b, H3c, H3d, H3e, H3f, H3g, H4 SDC1, SDC2 and ST2, these need to provide flexibility to enable site specific influences to be taken into account and to ensure the council themselves are not prejudicing their ability to try and meet their unmet needs in line with para 11 of the NPPF.</p> <p>Once they have been through this process, the Council can then look to enter into Statements of Common Ground with Mid Sussex, Horsham and Reigate and Banstead (the other authorities within the Northern West Sussex Housing Market Area) to:</p> <ol style="list-style-type: none"> <li>1 Quantify the total potential capacity in each authority area (and how this compares to the authorities' own need);</li> <li>2 Show that options for addressing some (or all) of Crawley's unmet need have been considered; and</li> <li>3 Show that the adverse impacts of addressing some (or all) of Crawley's unmet need would outweigh the benefits.</li> </ol> <p>In the context of the above, we have not seen evidence presented with the Reg 18 Plan to show what has been discussed and agreed thus far through the duty to cooperate. Other than the comments in sections 2 and 12 of the Reg. 18 Plan no documentation has been produced to clarify this matter.</p>	<p>A Statement of Common Ground relating to strategic planning issues is currently being prepared between Crawley Borough Council, Horsham District Council, Mid Sussex District Council and West Sussex County Council.</p>
REP169/590	Judith Ashton Associates on behalf of	Para. 2.23 &	Finally, we note that para 2.23 of the Reg 18 Plan indicates that most (80%) of the housing land supply (3,852 dwellings) will be delivered through the new Forge Wood	The Local Plan Review has introduced policies designed to maximise densities with minimum space standards. The Local Plan is allocating

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	A2Dominion Homes Ltd.	Housing Trajectory	<p>neighbourhood in the north east of the borough (1,647 dwellings), and through residential development in the town centre (2,205 dwellings), with the remainder coming forward on a number of smaller sites within existing neighbourhoods. Whilst not wishing to comment upon the housing trajectory contained within appendix B of the Reg 18 Plan at this juncture as the position will change as the plan evolves, we would suggest that in promoting a trajectory such as that contained within appendix B, the Council need to provide evidence to substantiate the proposed start dates./ delivery rates anticipated – esp. for some of the larger (50(+)) sites, so as to demonstrate compliance with the definitions contained within the NPPF and to ensure that said trajectory is sufficiently robust and flexibly to ensure that any delays will not affect the overall housing trajectory, as well as the council's 5 year housing land supply situation. To this end we note the Reg 18 Plan does not actually set out the council's position in the 5 year HLS, which is should moving forward, as it needs to demonstrate a 5 year HLS, and if this cannot be demonstrated; provide for the allocation of additional sites / to review the development potential of the proposed allocations to enable the 5 year housing land supply target to be met in full.</p> <p>To conclude, we are disappointed to note that CBC have resolved to adopt a housing target of just 451 dpa, which is just 40% of the target identified by the Government's standardised methodology capped at 40% (752 dpa) given the housing needs of the area. More should be done to look to achieve a higher housing target, including a review of the development capacity of the proposed allocations.</p>	<p>sites on playing fields, education land, ecologically and historically important sites, and very small sites within the built-up neighbourhood areas. However, based on the actual land supply available for building, this is still not enough to meet the full standard methodology housing requirement.</p> <p>The council considers the Local Plan Review takes every opportunity to maximise housing delivery within the borough's administrative boundaries and contends there has been no stone left unturned in looking for housing opportunities. The housing supply figure has increased since the Regulation 18 consultation.</p>



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			<p>As drafted the Reg 18 Plan and associated SA fail to look to address one of the key tenants of the plans vision and a key sustainability objective of the plan. In addition, it is clear that too strong a reliance is being placed upon delivery through the duty to cooperate, which has not been evidenced.</p> <p>As a result of the above the plan is not in our opinion 'positively prepared' and the housing target is 'not justified' and cannot be said to be 'effective'; such that the plan is 'not consistent with national policy' and is not therefore sound.</p>	
REP174/629	Gatwick Airport Limited		<p><b>Chapter 12 Housing Delivery</b>  <b>Consultation Question – Where do you think new housing should be built over the period 2020-2035?</b>  A key aspect of the Local Plan is to bring forward suitable housing development sites particularly in areas experiencing population growth. We believe it is important to highlight as a busy and intensifying commercial airport operation we do support the principal that housing development proposals must be constrained to areas which fall outside of unacceptable levels of noise exposure given the existing noise contours for the current airport operations and those to be applied if an additional runway to the south of the airport were to be realised.</p> <p>GAL recognise that the constraints CBC must balance in achieving the delivery of new housing development and we clearly recognise the overall need for new residential development but it is imperative that new residential development is located in locations that are not exposed to unacceptable levels of noise from aircraft. The CBC draft</p>	<p>The council has updated the noise contours in the Local Plan to now reflect the most up-to-date ones in the Gatwick Airport Masterplan, for both day and night noise.</p> <p>As part of the approach for the North Crawley Area Action Plan, it is considered appropriate that the noise contours used for development management decisions remain to reflect those of a further runway to the south of the existing 'main' runway, until final planning policy decisions are finalised through the examination and adoption of the Area Action Plan Development Plan Document.</p> <p>On this basis, Steers Lane Key Housing Site has been removed from the Local Plan allocations, as it falls above the 60dB noise contours. Notwithstanding this, there is an outstanding Appeal on this which may be determined ahead of the Local Plan's adoption. If the current appeal</p>

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			<p>policy EP4 states, under the heading 'A. Noise Sensitive Development': <i>'for aviation transport sources the unacceptable Adverse Effect is considered to occur where noise exposure is above 60dB LAeq 16hr.'</i></p> <p>We note this statement is under the heading 'Noise Sensitive Development' which would include new residential development, and we would support planning policies to ensure that new housing is not permitted above this level of aircraft noise.</p> <p>GAL therefore does not support the identification of future housing sites within Steers Lane and Heathy Farm which we believe may be subject to unacceptable levels of noise from aircraft under the proposed Policy EP4.</p>	<p>is successful, under the current adopted Local Plan policy (of 66dB), it will become a committed site whilst a permission is extant.</p> <p>Heathy Farm is considered to fall below the 60dB contours and is retained as a Key Housing Site.</p>
REP174/630	Gatwick Airport Limited	Policy H2	<p><b>Policy HC2: Key Housing Sites</b> <b>Consultation Question – Are all of the sites identified in the Policy suitable for residential development?</b></p> <p>Gatwick Airport seeks policy amendments relating to the provision of new major housing sites in the proposed Policy HC2. Gatwick seeks the addition of policy text which clarifies that land identified as having potential to bring forward new major housing is limited to sites below aircraft noise contours of 60dB LAeq 16hr. This is because GAL considers 60 dB LAeq 16hr is the threshold at which aircraft noise becomes unacceptable for of major housing schemes and this position is supported by Policy EP4. GAL therefore object to the sites promoted in Policy H2 at both Steers Lane and Land to the southeast of Heathy Farm which will be located within unacceptable aircraft noise contours.</p>	<p>As above, following the updated noise contours the Key Housing Site Allocations have been assessed and amended to reflect the contours proposed.</p> <p>The proposed wording for paragraph 12.16 is agreed, and has been incorporated into the paragraph accordingly. However, the Local Plan Policy approach is to apply the policy restriction to all housing development, not just major schemes. This consistent approach was agreed as part of the previous adopted Plan examination as sound.</p>

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			GAL seeks the addition to para 12,16 of the draft Plan of suggested new supporting text: <i>'and where major housing development is proposed it will not be permitted in noise contours above the 60dB LAeq 16hr noise threshold'</i> .	
REP174/631	Gatwick Airport Limited	Policy H3e	<b>Policy H3e: Upward Extensions Consultation Question - Are the requirements identified in the Policy appropriate for the type of development identified?</b> GAL supports Policy H3e (i) in the requirement for new upwards extensions to have been agreed with Gatwick Airport to ensure that the proposal complies with the safety needs of Aerodrome Safeguarding. GAL for the same reasons supports the text of para 12.69.	Support noted.
REP174/632	Gatwick Airport Limited	Policy H8	<b>Policy H8 Gypsy, Travellers and Travelling Showpeople Sites</b> Gatwick supports the need for the inclusion of a Policy which makes provisions for the allocation of a Gypsy Traveller and Travelling Show People Site. However, in its current form Policy H8 is considered by GAL to be in conflict with both Policy GAT2 Option 1 of the draft Plan and Policy EP4.  GAL considers the noise exposure levels proposed in policy H8 (a) are unacceptably high and could result in adverse impacts on residents of such sites, particularly given that residential accommodation such as caravans cannot adequately be mitigated against noise exposure in the same way as bricks and mortar can be.  In addition, GAL also seeks the removal of the final paragraph of the Policy H8 regarding the issuing of a temporary planning consent for sites predicted to be noise	Noted. Draft Local Plan Policy EP4 and the accompanying Local Plan Noise Annex identify the Unacceptable Adverse Effect level as occurring at 60dB. Policy H8 identifies a cut-off of 57dB for permanent sites, and 60dB for long-term temporary sites. The noise exposure figure for long-term temporary (60dB) therefore matches that of Policy EP4, and also the approach of the Aviation Strategy which is based on the fact that there is no escape from the noise outside, so long-term temporary users are in the same position as that for housed individuals. The 57dB metric for permanent sites is below the 60dB metric, and therefore also protects the occupants. For temporary sites, the maximum exposure is 66dB. This figure is beyond the 60dB threshold at which noise exposure becomes unacceptable. However, the Unacceptable

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			<p>affected at some point in the future. GAL considers that such temporary consents could lead to difficulties securing the vacant possession of the land for the development of an additional runway (to the south) and which may compromise the timely delivery of a nationally significant infrastructure scheme.</p> <p><b>Supporting text of para 12.110</b> GAL supports the inclusion of supporting text para 12.110 regarding Broadfield Kennel and the identification of the potential future noise impacts from aircraft at the site.</p> <p><b>Supporting text of para 12.112</b> GAL strongly agree with supporting text of para 12.112 regarding exposure to noise from aircraft at proposed traveller, gypsy, showpeoples sites where sites in excess of 57 decibels on a permanent basis, 60 decibels for long term temporary sites of up to one month and 66 decibels for temporary site being unacceptable in terms of the adverse effects upon residents. However the noise limits identified in para 12.112 are confusing as they are also clearly in conflict with proposed Policy EP4 and the noise thresholds laid down in Table 1 of the Local Plan Noise Annex. Para 12.112 therefore needs further clarification.</p>	<p>Adverse Effect level (66dB) recognises the negative health impacts associated with long-term exposure to noise, whereas users of a temporary site would only be exposed to this level of noise for a short time. The noise metrics identified in draft Policy H8 are therefore consistent with the approach of draft Policy EP4 and the accompanying Local Plan Noise Annex.</p> <p>Paragraph 12.112 (now 13.46) has been amended to reflect the approach being taken by the draft Local Plan Review in removing safeguarding but requiring the Area Action Plan for the proper planning of this area.</p>
REP175/641	Savills on behalf of St. Catherine's Hospice		<p><b>Section 12: Housing</b> 3.21. The Council has acknowledged, at paragraph 12.39, that they are only able to meet approximately 43% of their housing target and will have an unmet need of approximately 6,475 dwellings over the plan period. The remaining homes are to be considered through Duty to Cooperate with neighbouring authorities. However, due to similar increases in projected household growth across the Northern West Sussex Housing Market Area it has become</p>	<p>Welcome support for allocation.</p> <p>Constraints on site, and requirements for high quality layouts and design have led to the capacity being carefully assessed. The location is not in a high density public transport zone. Higher densities may be more acceptable for older people's housing as this could arguably be</p>

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			<p>significantly more challenging for the neighbouring Districts to accommodate Crawley's unmet housing needs. In light of this, the onus is on CBC to maximise housing delivery within the District boundary.</p> <p>3.22. In accordance with paragraph 68 of the NPPF, which emphasises the important contribution that small and medium sized sites can make to meeting the housing requirement within an area. Draft Policy H1 (Housing Provision) states that the Council will consider 'all reasonable opportunities' including: brownfield sites; surplus green space; town centre living and opportunities on the edge of Crawley, where consistent with the policies set out in the Local Plan.</p> <p>3.23. St Catherine's Hospice are acquiring new and enhanced facilities in Pease Pottage. Once the hospice has relocated, the 0.73ha site will be available for redevelopment and intensification. This provides the opportunity to contribute an additional circa 70 dwellings/80-bed care facility to help meet Crawley's housing supply.</p> <p>3.24. Policy H3b is fully supported, in particular the densification of housing schemes. However, CBC should provide more guidance as to what a 'sustainable location which would be appropriate for higher densities' would be. The site is situated within a sustainable location due to its proximity to public transport links and other infrastructure such as schools, shops and employment opportunities.</p> <p>3.25. Whilst the site has some site constraints, namely the neighbouring Conservation Area, any future development scheme will be sensitively and innovatively designed to</p>	<p>justified it would not generate as high a need for parking.</p> <p>Whilst the desire for flexibility is understood, the council's evidence has shown there are particular needs for elderly people through working jointly with West Sussex County Council and in the independently prepared Strategic Housing Market Assessment. It is considered that, as it is difficult for developers of specialist housing for older people to compete with other developers for the land, in order to support the delivery of specialist accommodation (particularly that which includes a significant proportion of affordable housing and/or affordable care) this site is a suitable and appropriate site for housing for the elderly, or a care home.</p>

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			<p>maximise the potential capacity of the site, incorporating a design-led approach with particular regard to the character of the Malthouse conservation area. The densification of this site is therefore in accordance with the emerging strategic policy H3b.</p> <p>3.26. St Catherine's would like to see the site included as a draft allocation with flexibility built in for use class C3/C2, comprising up to 70 residential dwellings/elderly person accommodation or up to 80-bed care facility.</p> <p><b>4. Conclusions</b></p> <p>4.1. This representation is made to the Crawley Borough Council (CBC) Regulation 18 Consultation on the Emerging Local Plan. The consultation is open between 15 July 2019 and 16 September 2019.</p> <p>4.2. The representation is submitted on behalf of St Catherine's Hospice and provides commentary on key aspects of the Emerging Plan as applicable to site at St Catherine's Hospice, which is being promoted to the CBC Local Plan Review for the redevelopment of circa. 70 dwellings/ elderly person accommodation or 80 bed spaces, for use as a residential care home or nursing home. The relocation of St Catherine's Hospice provides the opportunity to maximise the residential provision on the Malthouse Road site, as the site will be available for redevelopment in 2022. The redevelopment of the site can demonstrate the capacity for medium sites to simultaneously enhance the surrounding area whilst contributing to housing delivery in the District.</p> <p>4.3. Due to the significant land constraints in the Borough, the Council need to provide reassurance to landowners</p>	

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			<p>and developers by proactively allocating land for development. The draft Local Plan currently makes provision for 4,806 homes, the Council should seek to increase these figures by making a concerted effort to encourage development on small and medium sites, such as St Catherine's site at Malthouse Road.</p> <p>4.4. These representations are underlined by the promotion of the site for residential development. As such, Savills and St Catherine's Hospice reserve the right to comment on the future iterations of the Local Plan Review particularly given that comments provided in these representations are constrained by the focus of the Regulation 18 Consultation, and limited evidence base.</p>	
REP176/642	Savills on behalf of Bellway Homes Limited	Policy H2	<p><b>Representations to Crawley's Local Plan Review Regulation 18 Consultation Former TSB Site, Russell Way, Crawley</b></p> <p>Thank you for providing us with the opportunity to engage with the Regulation 18 consultation on the Council's Local Plan Review. I write on behalf of our client, Bellway Homes Limited (South London), who has an interest in the above site.</p> <p>Below, I set out a brief summary of the context of the site before turning to specific comments on the consultation document.</p> <p><b>Context</b></p> <p>The site is located off Russell Way within the Three Rivers area of Crawley. The site measures approximately 0.31 hectares in size and is currently a cleared, vacant site. Within the current Local Plan the site is allocated as a key housing site.</p>	<p>Site representations noted.</p> <p>Comments regarding the Standard Methodology noted.</p> <p>The council is in on-going discussions and joint evidence gathering with the neighbouring authorities and as part of the Duty to Cooperate, matters such as unmet needs above those already covered by the adopted Local Plans will be addressed. CBC is confident that, based on previous experience, this will be productive and effective. The neighbouring authorities are reviewing their own Local/District Plans at differing timescales and the Plan periods are different. However, the joint working reflects the acknowledgement of this.</p> <p>A comprehensive reassessment of all capacity figures for the allocated housing sites has been</p>

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			<p>Bellway Homes has agreed terms to buy the site from the current landowners with the intention of pursuing a planning application for residential development.</p> <p><b>Comments on the Consultation Document</b>  <i>Strategic Policy H2: Key Housing Sites</i>            We note that the Council is proposing to retain the key housing allocation at the Former TSB Site with an indicative capacity of 40 dwellings. The retention of this allocation is strongly supported in principle, however, we consider that the allocation for only 40 dwellings (whilst only indicative) is a missed opportunity to optimise the development potential of the site and to “...boost significantly the supply of housing...” as sought by the National Planning Policy Framework. This is particularly true in the context of the supply of housing within the Borough where the Council has only planned for 43% if it's housing need over the 2020-2035 plan period (this is down from 50% within the current Local Plan).</p> <p>The site is a brownfield site within the settlement boundary and best use of it should be made to relieve pressure on less suitable sites, including greenfield sites. Given the site's accessible location by modes of transport other than the private car, as well as its proximity to a range of local services and facilities, it is considered that the site can accommodate in the region of 60 dwellings. It is therefore respectfully requested that the indicative capacity for the Former TSB Site be amended to 60 dwellings within the next version of the Local Plan.</p>	<p>undertaken in line with the draft density policy. All capacity figures established for the allocated sites are indicative (with the exception of Land East of Balcombe Road/Street Hill where the figure is stipulated to be a maximum figure). On this basis, higher housing numbers can be provided subject to detailed assessment and in line with other policies of the plan. However, the capacity figure is based on an assessment of the site which does reflect a realistic expectation of a Local Plan policy-compliant scheme and anything significantly different would need to be very clearly setting out justification and evidence to support that all policies requirements can be achieved within a site layout.</p>
REP176/644	Savills on behalf of Bellway	Policy H4	<p><i>Strategic Policy H4: Future Housing Mix</i>            We're pleased to note that the wording of Policy H4 retains the same flexibility as Policy H3 of the current Local Plan</p>	<p>Support for flexibility in the Policy noted.</p>



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	Homes Limited		<p>with regards to housing mix, and does not stipulate specific requirements for certain dwelling types and sizes. This will ensure that site specific circumstances and characteristics are taken into account along with the viability position of specific schemes.</p> <p>However, we note that within the supporting text to Policy H4 paragraph 12.84 sets out recommended mix for both market (owner occupier and private rent) and affordable dwellings. We think that the supporting text needs to be made clearer in setting out that this is a strategic recommended mix for the whole borough and should not be applied rigidly to individual development proposals. Such a rigid approach could potentially hamper the delivery of much needed housing within the Borough.</p>	<p>However, disagree with the suggestion to introduce further flexibility in the supporting text. The policy is clear and the evidence and justification for this approach is set out in the SHMA. Previous experience, highlighted in the 2016 housing market mix study, has shown that reliance on the market alone to deliver a balanced mix of units has proved unsuccessful and to ensure the proper cost of this is taken into account in the land valuation stage a clearer policy approach is considered more appropriate. On this basis, it has been taken into account in the expectations for capacity of sites and viability assessments.</p>
REP176/645	Savills on behalf of Bellway Homes Limited	Policy H5	<p><b>Strategic Policy H5: Affordable Housing</b></p> <p>We note that the Council has not carried forward the policy requirement for 10% low cost housing in addition to the requirement for 40% affordable housing (subject to viability). This is supported. The provision of such housing is largely governed by national initiatives which are inherently open to change. A specific policy requirement for low cost housing risks jeopardising the provision of affordable housing if such initiatives change.</p> <p>We also note that the policy wording relating to exceptions to the provision of affordable housing has been strengthened from the current Local Plan. Strategic Policy H5 of the consultation document now states that:</p> <p><i>“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</i></p>	<p>Support for low cost removal noted.</p> <p>The policy wording has been amended to include reference to abnormal costs and clarify this will not include costs paid for the land. All of the matters suggested are considered to be picked up in the Whole Plan Viability Study and should therefore provide a robust position upon which planning applications can be prepared and sites can be assessed against a policy compliant position in their early stages. In accordance with national guidance, viability studies should not be undertaken to avoid meeting the Local Plan affordable housing requirements, and schemes should be considered viable unless there are really distinct different situations associated</p>

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			<p><i>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.” (author emphasis).</i></p> <p>Paragraph 12.97 of the supporting text to Policy H5 goes on to state that:  <i>“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 clawback provisions.” (author emphasis).</i></p> <p>It is not clear from the above what constitutes ‘exceptional circumstance’, other than potentially just ‘abnormal costs’. However, there are a number of other factors which can impact the viability of a scheme and the provision of affordable housing. These included (but are not limited to) land value, developer return, sale values and rental values. Further clarity should be provided within the next version of the new Local Plan on what constitutes ‘exceptional circumstances’ to allow developers to assess what impact this will have. We respectfully reserve the right to provide</p>	<p>which could never have been envisaged at the Plan making stage.</p>

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			further comments on this matter at the next stage of consultation.	
REP177/661	The Woodland Trust	Policy H1	<p><b>Housing</b></p> <p>Policy H1 – We welcome the recognition of ancient woodland as a development constraint (section 12.34). We recommend specific policy wording to safeguard ancient woodland which is set out in our comments on policy G11 below.</p>	<p>Support noted.</p> <p>Comments made on Policy G11 are dealt with under that Policy within the Green Infrastructure chapter table.</p>
REP177/662	The Woodland Trust	Policy H2	<p>Policy H2 - Development which would result in the loss of ancient woodland, aged or veteran trees should not be permitted. In particular, we object to the allocation of land for housing that includes the following ancient semi-natural woodlands (ANSW):</p> <ul style="list-style-type: none"> <li>– Black Corner Wood ASNW (Grid reference: TQ2996939934)</li> <li>– Black Corner Wood ASNW (Grid reference: TQ2980139854)</li> <li>– Black Corner Wood ASNW (Grid reference: TQ2971939604)</li> <li>– Titchmeres Wood ASNW (Grid reference: TQ2957539239)</li> <li>– Forge Wood ASNW (Grid reference: TQ2964738891)</li> <li>– Unnamed ASNW at TQ2965338714</li> <li>– Unnamed ASNW at TQ2984538749</li> <li>– The Birches ASNW (Grid reference: TQ2921138575)</li> <li>– Tinslow Shaw / Mine Pit Wood ASNW (Grid reference: TQ2901638590)</li> <li>– Unnamed ASNW at TQ2900238628.</li> </ul> <p>We urge safeguarding these irreplaceable areas of woodland by excluding them from any future development sites, with an appropriate buffer.</p>	<p>It appears that the woodlands noted are within the Forge Wood neighbourhood. This neighbourhood was granted on appeal, and the detailed planning applications associated with each phase have addressed matters of ancient woodland protection.</p> <p>Summersvere Wood is adjacent to the Tinsley Lane Key Housing and Open Space site. This site includes the opportunity for opening up public access to the ancient woodland, which currently has 'allowed' access rather than any formal access arrangements. It is felt that proper management and provision of footpaths will better protect the ancient woodland, particularly as new housing development will bring residents (and associated pets) closer to the woodland. A Development Brief has been adopted to establish the principles of the need for ecological surveys to lead the final scheme (pages 22-24): <a href="#">Tinsley Lane Development Brief (April 2017)</a> . The Local Plan has been amended to include</p>

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			In addition, we are concerned about the proximity of the site allocations to Summersveres Wood (Grid reference: TQ2868538572) and to Tilgate Forest & Lodge ASNW (Grid reference: TQ2704334553).	reference and links to the adopted Development Brief.
REP177/663	The Woodland Trust	Policy H3b	Policy H3b – We welcome the protection for ancient woodland and veteran trees in paras v) and viii). As a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.	Support noted.  Cross-reference to Policy GI3 and national guidance has been included in the Policy wording. Policy GI3 includes reference to the Natural England Standing Advice in relation to buffer zones.
REP177/664	The Woodland Trust	Policy H3c	Policy H3c - We welcome the protection for ancient woodland and veteran trees in paras v) and viii). As a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.	Support noted.  Cross-reference to Policy GI3 and national guidance has been included in the Policy wording. Policy GI3 includes reference to the Natural England Standing Advice in relation to buffer zones.
REP177/665	The Woodland Trust	Policy H3g	Policy H3g - We welcome the protection for ancient woodland and veteran trees in para xiv) and section 12.81. As a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.	Support noted.  Cross-reference to Policy GI3 and national guidance has been included in the Policy wording. Policy GI3 includes reference to the Natural England Standing Advice in relation to buffer zones.

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REP178/674	FirstPlan on behalf of Crawley Goods Yard Operators	Policy H2	<p>In respect of Draft Strategic Policy H2, it is noted that the designation of the Tinsley Lane site has the same wording as before except for reference to the adopted development brief. It is also noted that draft Paragraph 12.51 is the same as adopted Paragraph 6.53. The Crawley Goods Yard operators support the previously approved wording in both Policy H2 and draft Paragraph 12.51 which requires that development must be carefully planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent minerals site. This wording was found sound by the previous Inspector and continues to be supported by National and County level policy.</p> <p>In conclusion, the Goods Yard operators support the recognition of their site as a Safeguarded Railhead on the draft Proposals Map and support the drafting of Policies EC10 and H2 which require new residential development to be designed to mitigate any impact from the employment use on new residents, and specifically requires the Tinsley Lane site to take into account the Crawley Goods Yard.</p>	Support noted.
REP183/705	Rusper Parish Council	Policy H3g	<p>Rusper Parish Council would like to comment on your Local Plan Review as follows:</p> <p><u>Policy H3g: Urban Extensions</u></p> <p>Rusper Parish Council has concerns about the suitability of this policy in relation to Rusper for the following reasons:</p> <ul style="list-style-type: none"> <li>Your plan states that the Crawley character is a compact town within a countryside setting. If development to the west takes place the countryside would be harmed. This would impact the wellbeing of both Rusper and Ifield residents who enjoy open access direct to the countryside.</li> </ul>	<p>Comments noted. The land promoted by Homes England is located within Horsham and will be considered as part of the Horsham District Plan review (including being assessed as part of their Sustainability Appraisal and other supporting evidence documents and subject to public consultation and independent examination). The Horsham Local Plan Review timetable can be found at:</p> <p><a href="https://beta.horsham.gov.uk/planning/planning-policy/local-development-scheme">https://beta.horsham.gov.uk/planning/planning-policy/local-development-scheme</a></p>

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			<ul style="list-style-type: none"> <li>This area of countryside is an important habitat.</li> <li>More information is required for the proposed Western Relief road. If this travels through Rusper the impact would be devastating to the countryside, homes and life quality of residents. Rusper Parish Council would ask to be involved in the development of this.</li> <li>Expansion into Rusper would impact heavily on the character of Rusper, the lifestyle of its residents and its infrastructure.</li> </ul> <p>Rusper Parish Council would propose an addition to this policy that if expansion to the west is proposed that the impact assessment takes into account the effect of development here on Rusper, considering the combined effects of Kilnwood Vale and Land North of Horsham.</p> <p>Please note that expansion to the west of Crawley does not accord with the emerging Rusper Neighbourhood Plan, which can be viewed here: <a href="https://rusper-np.org.uk/regulation-14-rusper-neighbourhood-pre-submission-plan">https://rusper-np.org.uk/regulation-14-rusper-neighbourhood-pre-submission-plan</a></p> <p>Rusper Parish Council would appreciate being part of any discussions that take place surrounding expansion to the west or a relief road.</p>	<p>However, the Crawley Local Plan Review acknowledges that development on the edges of Crawley's administrative boundaries has taken place over the years to varying degrees of involvement, and agreement, of Crawley Borough Council. In such cases, much of the impact on infrastructure and strategic facilities and services falls on Crawley.</p> <p>Whilst Crawley Borough Council is not able to direct development outside of its administrative area, Crawley's proposed draft policy on urban extensions seeks to establish the expectations of the council should an urban extension or proposed development come forward on the borough's administrative boundaries. Furthermore, Crawley Borough Council is working closely with its neighbouring authorities to consider the unmet needs of Crawley over the Plan period, including working with Horsham District Council in respect of considering the promotion of the land to the west of Crawley by Homes England.</p>
REP184/724	Sussex Wildlife Trust	Para. 12.34	Section 12 – Housing Paragraph 12.34 requires amending, so that the term Sites of Nature Conservation Importance is replaced with the term Local Wildlife Site (LWS) in line with national and local practice.	Noted – this amendment has been made.
REP184/725	Sussex Wildlife Trust	Policy H1	Strategic Policy H1: Housing Provision SWT is concerned by the capture all approach within this policy which states that: 'All reasonable opportunities will be considered including: brownfield sites; surplus green	This wording is used in the adopted Local Plan Policy H1. It reflects the balance needed to be taken in considering sustainable development of sites within the borough. This was acknowledged

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			<p>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.'</p> <p>We acknowledge the policy wording does state 'consistent with the other policies' however we do suggest that the terminology of 'reasonable opportunities' is unclear. CBC should provide further clarity on how the reasonableness of an opportunity will be assessed.</p>	<p>by the Planning Inspector in his report: <a href="#">Inspector's Report into the Crawley Borough</a> (paragraph 19) in which he confirms that the "Plan recognises the balance has to be found between urban consolidation and retaining the valued features which contribute to Crawley's character; it includes a range of policies which aim to protect and enhance areas and amenities of special importance". The reference to "all reasonable opportunities" is considered more appropriate on this basis rather than the unrestricted "all opportunities" as otherwise suggested in the NPPF.</p> <p>Policy H1 cross-references to the other Policies in the Plan and the principle of sustainable development; this will provide the assessment on a site-by-site basis as to whether a housing scheme is considered reasonable in the context of ensuring against "detrimental town-cramming or unacceptable impacts on the planned character of the existing neighbourhood or on residential amenity" as set out in the paragraph above.</p>
REP184/726	Sussex Wildlife Trust	Policy H2	<p>Strategic Policy H2: Key Housing Sites</p> <p>We note this policy suggests new housing sites as well as those that are being brought forward from the last plan. We are not aware of any work to show that preliminary ecological appraisals of these sites have been undertaken prior to their inclusion within the draft local plan. We strongly encourage CBC to consider the way these potential allocations sit within the green infrastructure</p>	<p>Detailed ecological assessment will be required as part of the planning applications. The Policies of the Plan apply to the allocated sites (including GI2 net gain and Green Infrastructure). Unless otherwise stated in the policy, the only new sites identified in the draft Plan are in the town centre/urban area on currently developed, brownfield sites, therefore the principle of</p>

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			<p>strategy for the Borough and to ensure that when allocations are made, they do not act to sever networks vital for climate change resilience and natural capital as per paragraphs 170 and 148 of the NPPF.</p> <p>SWT maintains its objection to the allocation of a Local Wildlife Site for housing. Given the requirement in the NPPF for plans to promote the conservation, restoration and enhancement of ecological networks and the fundamental role that locally designated sites play in this network, this is inappropriate. The Government's Planning Practice Guidance (ref: 013-20190721) states that LWS are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. National planning policy expects plans to identify and map these sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.</p> <p>Therefore we still believe that the Land east of Balcombe Road allocation should be removed from the policy. If CBC is minded to act contrary to the PPG then we believe the wording needs to be strengthened as follows in order to avoid as many impacts as possible:</p> <p>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:</p> <ul style="list-style-type: none"> <li>i. respect its setting outside the built up area and the rural character of the Worth Conservation Area;</li> <li>ii. concentrate the residential element and associated infrastructure towards the least sensitive areas, where</li> </ul>	<p>development as an urban site is already accepted. No site within the existing Green Infrastructure is a new site. Sites should apply Policy GI1 to maximise green infrastructure linkages wherever possible.</p> <p>Objection noted.</p> <p>The council objected to the developer's request for this site to be allocated for housing development through the last Local Plan. The Inspector determined the entire should be allocated to ensure some of the important habitat is retained and properly managed.</p> <p>The site is sensitive in terms of biodiversity, heritage, landscape and flooding and is subject to policy expectations and the requirement for the council to produce a development brief. The housing number referred to as 15 dwellings in the Local Plan is clearly expressed as a "maximum"</p>



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			<p>possible, and to be located within the southern section of the housing, biodiversity and heritage site;</p> <p>iii. reflect, enhance and ensure no significant harm to the locally designated historic parkland;</p> <p>iv. allow a suitable unbuilt margin around the archaeologically sensitive Moat;</p> <p>v. <del>limit</del> <b>avoid</b> harm to the species-rich meadow grassland which contributes to the <del>Site of Nature Conservation Importance</del> <b>Local Wildlife Sites (LWS)</b>;</p> <p>vi. maintain the woodland vegetation <del>barrier</del> <b>buffer</b> between the development and the church, to retain the historic significance of the context of Worth Church; and</p> <p>vii. be accompanied by a long-term commitment to the ecological enhancement and <del>proper</del> <b>positive</b> management of the remainder of the <del>SNC</del> <b>LWS</b> (excluding the ponds and woodland in the centre and north-east in separate ownership) for the benefit of biodiversity.</p> <p>Detailed <b>and up to date</b> ecological and archaeological assessments must be carried out. <b>Where impacts cannot be avoided</b> and adequate mitigation and compensation measures <b>will be</b> provided to offset any harm caused to the site's important assets.</p>	<p>figure and the final quantum of development on the site will need to adequately address all of the environmental and planning constraints and opportunities associated with the site specifics, including through far more detailed assessments than the high levels previously taken as part of the Local Plan 2015 process. A development brief is currently being prepared and has been consulted upon twice in order to provide a greater level of information regarding the constraints and opportunities of this site.</p> <p>Proposed wording changes are agreed and the amendments have been made to the policy.</p>
REP185/739	Carter Jonas on behalf of Homes England	Policy H1	<p><b>Strategic Policy H1: Housing Provision</b></p> <p>Homes England supports the Council's commitment to working with neighbouring authorities in the Northern West Sussex Housing Market Area to explore the potential for urban extensions to Crawley as this accords with paragraph 72 of the NPPF in that, <i>'the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed,</i></p>	Support noted.

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			<i>and supported by the necessary infrastructure and facilities'. (our emphasis)</i>	
REP185/740	Carter Jonas on behalf of Homes England	Policy H3g	<p><b>Strategic Policy H3g: Urban Extensions</b></p> <p>The introduction to this policy confirms the opportunity for potential urban extensions to Crawley that are outside of its administrative area to meet the housing need of the borough. It is confirmed that this should not result in harm to the setting of the Masterplanned New Town or result in urban sprawl or unplanned merging of settlements. It should also protect the setting of Crawley's existing neighbourhoods at the edge of the countryside. Whilst Homes England endorses these principles in the delivery of land west of Ifield, it is suggested reference is made to the Building for Life 12 principles in being able to bring forward a well-designed, comprehensive and sustainable vision for the 16th neighbourhood.</p> <p>Policy H3g deals specifically with urban extensions and contains a number of criteria. Homes England makes the following comments on a number of the criteria:</p> <p>i. <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</i> – Homes England does not consider that cross-boundary and site-specific Local Plan policies is workable and should be deleted. Whilst the flexibility provided in relation to the preparation of a Joint Area Action Plan is helpful, Homes England considers this to be unnecessary if the criteria is changed to read <i>"Development is to come forward through a Plan-Led</i></p>	<p>Disagree. This is not a decision for Homes England. There is the potential for cross-boundary and site-specific policies over the Plan period and this is not for discounting at this stage. Crawley and Horsham councils have a positive history in joint working, both through the formal development and adoption of the Joint Area Action Plan for West for Bewbush and also in the alignment and joint working as part of the preparations of the individual adopted Local Plans.</p>

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			<p><i>process, supported by clear cross-boundary co-operation with the relevant neighbouring authority". Although there is some overlap with ii., the reference to the a Plan-Led process is necessary;</i></p> <p><i>ii. The proposals are supported by a comprehensive Masterplan agreed by the relevant authorities (including the county council), see Policy CD5 – Homes England agrees that it is right that any development should be guided by a comprehensive Masterplan based around the principles of a Garden Community / the Building for Life 12 principles and it follows logically that if any proposal is to be accepted that the Masterplan will have been agreed, but Homes England is concerned that the wording of the policy is ambiguous in regard to the role of the Masterplan. Homes England proposes that the wording of ii. be changed to read "The proposals are supported by a comprehensive Masterplan based on the Building for Life 12 principles prepared in consultation with the relevant authorities (including the county council) and has regard to the urban design principles contained in Policy CD5".</i></p> <p><i>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 – Homes England welcomes the flexibility over the timing of the delivery of the Western Relief Road linked to the completion of properties because any significant housing development to the west of Crawley would be completed over a long time period and</i></p>	<p>Cooperation is a required element of the Local Plan preparation in order to meet the legal and soundness tests. This policy seeks to go beyond this in relation to joint planning.</p> <p>Support for need for urban extensions to Crawley to be comprehensively master-planned is Noted. Disagree with proposed alternative wording. Reference is now made to Policies CL2 and DD2 also. The NPPF is clear that plans should set out clear design vision and expectations, and these policies should be developed with local communities so they reflect local aspirations and are grounded in an understanding and evaluation of each area's defining characteristics (paragraph 125). Building for Life 12 is one 'tool' (and is recognised as such in the supporting text to Policy DD2) but is not the only one applicable. The Crawley Borough Local Plan seeks to set the context for character assessments which will help guide high quality development design appropriate to Crawley.</p> <p>The council maintains the position that no further development to the west of Crawley should take place without the full link road being provided and connecting fully from the A264 to the A23 north of County Oak. This is considered critical both from an existing capacity position of the roads and junctions in Crawley and also as a urban design and sustainable movement strategy to maximise changing habits and promoting sustainable and active travel opportunities from</p>

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			<p>the justification may not be made for the whole of the Western Relief Road to be completed before any dwelling is occupied;</p> <p><i>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 – Homes England supports the planned level of integration and the commitment to sustainable modes of transport. In order to maintain linkages from existing neighbourhoods through and into new neighbourhoods, it will be necessary to provide routes through lfield Brook Meadows and Ruser Road Playing Fields which will require some form of physical development. This is why Homes England has commented on Policy G14 which is considered to be too onerous and which sets an unreasonable test in relation to provision of linkages across this area;</i></p> <p><i>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 – Homes England supports this policy.</i></p> <p><i>The first sentence repeats xi and therefore this criteria should be amended to read "Development is designed and planned to provide defensible boundaries which both prevents inappropriate merging of settlements or the</i></p>	<p>the very start over and above road connections directly into Crawley which would otherwise be seen as the easy option. The council is disappointed with the indication from this representation that this position is not shared by Homes England, as promoter of a significant scheme immediately adjacent to Crawley's boundaries and creating substantial impacts on the borough's existing infrastructure. It had been understood from Homes England that upfront infrastructure to minimise negative harm to existing residents was something they were promoting as being committed to.</p> <p>The council strongly objects to the suggestion of a road across lfield Brook Meadows and Ruser Road Playing Fields. This is a Local Green Space, designated as such due to its particular qualities in terms of nature, heritage, recreation, landscape, tranquillity and access to the wider countryside. The council's full response to the representation on the site's designation through Policy G14 is set out in the Green Infrastructure chapter section.</p> <p>Support noted.</p> <p>The two criteria xi and xiii are considered to be linked – it is not sufficient to simply undertake the assessments and then for those to not inform the next stages of the process (as could be the case if the proposed amendment were used).</p>

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			<i>effects of urban sprawl and ensures the careful stitching together of existing and new built form where appropriate”;</i>	However, Criteria xi, xii and xiii have been amended to more clearly show they are each complementary steps in a process.
REP185/746	Carter Jonas on behalf of Homes England	Policy H1	<p><b>Representation in relation to Tinsley Lane</b></p> <p><b>1. Introduction</b></p> <p>Wood is retained by Homes England to respond to the Crawley Borough Local Plan 2020 – 2035 consultation draft on its behalf, particularly with regard to its land interest at Tinsley Lane, Crawley. The site is allocated in Policy H2 of the adopted Local Plan and draft Policy H2 of the Local Plan review to deliver new homes. An outline planning application for the site was submitted in 2018 seeking permission for up to 150 homes. This application is currently being considered by the Borough Council (reference CR/2018/0544/OUT). The representation below confirms that the site remains available and deliverable.</p> <p>Homes England intends to dispose of the site soon after planning permission is granted and therefore the site will come forward in the short term to deliver homes and boost supply. However, given the current undersupply of homes in the borough, there is a pressing need to ensure that development at Tinsley Lane makes an efficient use of the site in line with guidance in the NPPF.</p> <p>Homes England has robustly tested the capacity of the site through the preparation of the outline planning application and considers that 150 homes rather than 120 homes as stated in the adopted and draft Policy H2 are achievable on the site. Accordingly, in order to make an efficient use of this sustainable site and contribute to boosting supply, it is considered that the Policy should be amended to recognise that 150 homes can be delivered.</p>	<p>A Development Brief has been adopted by the council to support the good development of this site being progressed, this was prepared jointly and in consultation with the other stakeholders relating to this site.</p> <p>The Policy sets indicative figures for the quantum of development anticipated on this site. This was established by the Planning Inspector through the last examination where he concluded that “Given my concern about whether this [the full range of facilities being provided on the retained playing field] can be achieved, it is prudent to allow for the possibility that some of these facilities might have to be sites on the northern part of the adjacent housing site, with a consequent reduction in the number of dwellings”. The indicative figures are set for the Plan-making purpose and through evidence and full detailed layouts this can be amended upwards (or downwards) at planning application stage in order to achieve a policy-compliant scheme.</p>

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			<p><b>2. Strategic Policy H1: Housing Provision</b></p> <p>To support the Government’s objective of significantly boosting the supply of homes, the Local Plan will need to ensure that a sufficient amount of land can come forward to meet housing needs and ensure that land that is allocated and subsequently developed without unnecessary delay.</p> <p>The Council’s evidence suggests that there is significant upward pressure on housing need which the Local Plan review will need to address. Paragraph 60 of the NPPF states that in determining the number of homes in strategic plans, the level of housing provision should be based on the standard methodology set out in national planning guidance.</p> <p>The government’s New Standard Methodology for calculating housing need identifies a significant requirement of 752dpa which over a new plan period of 2020 to 2035 would be 11,280 dwellings. However, given the constrained nature of Borough of Crawley, the emerging Local Plan only makes provision for the development of a minimum of 4,806 net dwellings in the borough in the period 2020 to 2035. 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. This level of provision is significantly below the level required to meet the Objectively Assessed Need (675dpa) and the government’s New Standard Methodology for calculating housing need (752dpa).</p> <p>The Council does not consider this the whole requirement over the plan period can be met within the borough and subsequently they are in discussions with neighbouring</p>	<p>A comprehensive reassessment of all capacity figures for the allocated housing sites has been undertaken in line with the draft density policy. The indicative capacity figures are based on an assessment of the site which reflects a realistic expectation of a Local Plan policy-compliant scheme and anything significantly different would need to be very clearly setting out justification and evidence to support that all policies requirements can be achieved within a site layout.</p> <p>Policy H1 reflects the balance needed to be taken in considering sustainable development of sites within the borough. This was acknowledged by the Planning Inspector in his report: <a href="#">Inspector’s Report into the Crawley Borough</a> (paragraph 19) in which he confirms that the “Plan recognises the balance that has to be found between urban consolidation and retaining the valued features which contribute to Crawley’s character; it includes a range of policies which aim to protect and enhance areas and amenities of special importance”. The principle of sustainable development has to meet the full expectations of the NPPF, not just housing delivery – including those relating to promoting healthy and safe communities and achieving well-designed places. Policies SD1 and SD2 establish what this means in the context of Crawley at a high level and the policies of the Plan must be read as a whole.</p>

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			<p>authorities about meeting some of this unmet need. Taking into account existing commitments, the Council estimates that the scale of unmet need is approximately 6,475 dwellings over the Plan period.</p> <p>Given the emphasis of the NPPF to significantly boost the supply of housing in addition to guidance at paragraph 122 of the NPPF which states that planning policies and decisions should support development that makes efficient use of land, the emphasis should be on maximising the number of dwellings which could be accommodated on all sites, particularly existing allocations in order to boost supply.</p> <p>As noted above, Homes England's land at Tinsley Lane is allocated in policy H2 of the current adopted Plan. Although Policy H2 identifies the site as being suitable for 120 new homes, the allocation wording notes this is an indicative figure. The housing figures in the Local Plan are expressed as minimum figures.</p> <p>Policy H1 states that <i>"The Local Plan makes provision for the development of a minimum of 5,100 net dwellings in the borough in the period 2015 to 2030"</i>.</p> <p>Furthermore, in considering the adopted Local Plan, the Inspector acknowledged that a higher figure (138 dwellings) may be achievable <i>'if at detailed design stage the northern field is found to have the capacity to deliver the full range of playing pitch facilities.'</i> (Page 13 para 44 Inspectors Report into the Examination of the Crawley Local Plan).</p> <p>Wood has prepared an evidence base of technical reports to demonstrate the suitability of land at Tinsley Lane</p>	<p>The adopted Crawley Borough Local Plan is an up-to-date Local Plan. Crawley has a five year supply of housing sites and is exceeding the five year housing delivery test. Where development proposals meet the expectations and requirements of the Local Plan policies as a whole these will be approved without delay. An allocation for housing through Policy H2 establishes the principle of a site for residential development. However, an application for such is not considered in isolation.</p>

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			<p>through the preparation of the outline planning application submitted to Crawley Borough Council (Reference CR/2018/0544/OUT). This included transport, landscape, biodiversity and drainage/flood risk assessments. They demonstrate the suitability of this location, which can deliver a greater quantum of development than is currently identified in Policy H2. The illustrative masterplan submitted with the outline planning application demonstrates that 150 units can be accommodated on the central and southern land parcels with new football facilities being located on the northern parcel.</p> <p>Summary: in answer to the consultation questions, we have outlined some suggestions below for the inclusion in Policy H1 in order to support the objective of maintaining a housing supply:</p> <p><b>1. Sustainable development proposals will be approved without delay:</b></p> <p>In line with paragraph 11 of the NPPF, a clear presumption in favour of sustainable development should be applied. Development proposals that accord with the development plan should be approved without delay to enable sites such as Tinsley Lane to come forward quickly and boost supply.</p> <p><b>2. Development proposals should make an efficient use of sites:</b></p> <p>Guidance in the NPPF (paragraphs 122 and 123) is clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. The Council</p>	



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			<p>will therefore need to give consideration to policies which achieve the following:</p> <p>a. Optimise the use of land to seek a significant uplift in average density of residential development.</p> <p>b. Deliver minimum density standards.</p> <p>c. Refuse applications which would not make an efficient use of land.</p>	
REP185/747	Carter Jonas on behalf of Homes England	Policy H2	<p><b>2.1 Strategic Policy H2: Key Housing Sites Land at Tinsley Lane</b></p> <p>Home England supports the inclusion land at Tinsley Lane being identified as housing site. Policy H2 of the adopted Local Plan and draft Local Plan include the Tinsley Lane as being suitable for 120 dwellings. As noted above, the allocation wording notes this is an indicative figure and Homes England considers the outline planning application demonstrates that the site can deliver 150 dwellings. The submitted outline planning application proposals comply with the criteria in Policy H2 and development will provide a range of community benefits including new sports facilities and public access to Summersever Woods.</p> <p>Homes England considers that this site has significant potential to assist the Council in meeting its development needs, hence the outline planning application. It provides a highly deliverable and developable location in line with guidance in the NPPF. In particular, the site is available now, it offers a suitable location for development and is achievable with a realistic prospect that housing could be delivered within five years. The site:</p> <ul style="list-style-type: none"> <li>• Is not covered by any strategic constraints which would prevent development. It is flood zone 1 and has no other constraints that would preclude development.</li> </ul>	<p>As established above, the council disagree with the suggestion to change the indicative figure in the Policy from 120 dwellings to 150 dwellings. There has been no further information submitted to the Local Plan process which would justify this. Furthermore, through the preparation of the Development Brief it was considered that there may be justification for the quantum of the site to be below the 120 indicative figure in the Plan (for example due to design and layout in relation to noise and the woodland, the known need for allotment provision on-site due to the difficulty of securing an off-site location, the layout and needs of the football club, air quality and transport and access matters which are yet to be resolved). On this basis, it is considered appropriate to maintain the policy as existing and for this to be addressed through sufficient details submitted with a planning application to secure a permission.</p>

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			<ul style="list-style-type: none"> <li>• Presents a logical and sustainable location for new housing provision. It can deliver a quality development to assist in meeting the significant development needs in the Borough. It is an attractive location for new housing and would be likely to attract further market interest by national developers.</li> <li>• The site is in single ownership of Home England who is willing to bring the land forward. The site can deliver quality development to assist in meeting the Local Plan requirement, including a mix of dwellings. Should the current outline planning application be approved, Homes England would market the site immediately to deliver homes in the short term.</li> </ul> <p><b>Summary and suggested amendments to Policy H2:</b> As outlined above the Tinsley Lane site is considered suitable, and is deliverable. Homes England is progressing the site and there is an expectation that it will deliver homes within the next five years. However, in the above context of boosting supply and making an efficient use of sites (see comments on Policy H1) we suggest the policy wording should be changed to:</p> <p><i>Tinsley Lane, Three Bridges (deliverable) 420-150 dwellings, mixed use recreation/residential. Development of this site must include:</i></p> <ol style="list-style-type: none"> <li><i>the replacement of Oakwood Football Club;</i></li> <li><i>senior football pitch and facilities;</i></li> <li><i>a junior 3G football pitch;</i></li> <li><i>community use arrangements for the sports pitch facilities;</i></li> <li><i>enhancement and management for public access of Summersvere Woods;</i></li> </ol>	

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			<p><i>vi. on-site publicly accessible play space and amenity greenspace.</i></p> <p><i>vii. Consideration should also be given to the provision of allotments</i></p>	
REP186/763	CPRE Sussex	Policy H1	<p><b>Policy H1: Housing Provision Consultation Questions:</b></p> <p><b>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):</b></p> <p><b>a) plans should positively seek opportunities to meet the development needs of their areas, and be sufficiently flexible to adapt to rapid change;</b></p> <p><b>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:</b></p> <p><b>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</b></p> <p><b>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.</b></p> <p><b>Is this policy likely to support the objective of maintaining housing delivery?</b></p> <p><b>What other provisions would benefit the objective of maintaining housing delivery?</b></p> <p>Shunting Crawley's unmet housing need of approximately 6,475 dwellings into neighbouring authorities with open countryside does not represent sustainable development. We would like CBC to ensure that it has robustly assessed</p>	<p>The Local Plan Review has introduced policies designed to maximise densities with minimum space standards. The Local Plan is allocating sites on playing fields, education land, ecologically and historically important sites, and very small sites within the built-up neighbourhood areas. However, based on the actual land supply available for building, this is still not enough to get to 11,000.</p> <p>A substantial proportion of the new developments coming forward are flatted development which meet or exceed the density standards set by the Local Plan Review. 80% of the development within the Local Plan is coming forward through the new neighbourhood (Forge Wood) which was granted by appeal and is subject to a specific housing delivery number, much of which is being built at high density levels to avoid ancient woodland and provide sufficient open space required by Sport England; and the Town Centre, which are high density, flatted schemes. However, developers in Crawley must be mindful of the restrictions placed on high-rise buildings due to Gatwick's aerodrome safeguarding. In addition to this, the planned New Town neighbourhoods' character must be considered for any development. The planned New Town</p>

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			<p>its capacity to meet as much of this development as possible within the built-up area boundary once the current call for sites has been completed, and that the updated Urban Capacity Study is part of the evidence pack in the next stage of consultation.</p> <p>We would also like information as to whether CBC intends to build any social housing itself/through a development partnership or whether other similar mechanisms are being explored.</p>	<p>layout and age also means there is limited brownfield land available within the neighbourhoods and sites which are left are subject to restrictions such as ancient woodland or flooding.</p> <p>CBC is undertaking its own build affordable housing. The council's own-build programme began in 2009/10 when CBC became the very first LA to get Registered Provider status, and then since the 2012 HRA Review the council has maintained a steady build programme. This has resulted in a total of 199 dwellings completed to date with a further 117 dwellings currently on-site. Further sites are in the pipeline to come forward in due course. In addition to these, a further 837 dwellings have been secured through S106 agreements and delivered by the council.</p>
REP186/764	CPRE Sussex	Policy H2	<p><b>Policy H2: Key Housing Sites Consultation Questions: Are all of the sites identified in this Policy suitable for residential development?</b></p> <p>We are concerned about the allocation of Land east of Balcombe Road/Street Hill, Pound Hill. We do not believe Local Wildlife Sites should be allocated for housing as this is not consistent with national planning policy requirements to secure their protection from harm or loss and help to enhance them and their connection to wider ecological networks.</p>	<p>Objection noted.</p> <p>The council objected to the developer's request for this site to be allocated for housing through the last Local Plan. The Inspector determined the whole site should be included to ensure some of the important habitat is retained and properly managed.</p> <p>The site is sensitive in terms of biodiversity, heritage, landscape and flooding and is subject to policy expectations and the requirement for the council to produce a development brief. The housing number referred to as 15 dwellings in the Local Plan is clearly expressed as a "maximum"</p>

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				figure and the final quantum of development on the site will need to adequately address all of the environmental and planning constraints and opportunities associated with the site specifics, including through far more detailed assessments than the high levels previously taken as part of the Local Plan 2015 process. A Development Brief is currently being prepared and has been consulted upon twice in order to provide a greater level of information regarding the constraints and opportunities of this site.
REP186/765	CPRE Sussex	Policy H3g	<p><b>Policy H3g: Urban Extensions Consultation Questions: 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?</b></p> <p>We find this Policy slightly problematic as these developments are considered by the Local Planning Authority in which they are located, i.e. outside of Crawley Borough Council's remit and therefore, although relevant in terms of the Duty to Co-operate, not directly within CBC's control. Please see our response to Policy H1 – namely that we believe that it is appropriate and consistent with national policy for Crawley to absorb as much of its housing need within its existing built up area boundary as possible. We are particularly concerned with any additional encroachment into the AONB which has the 'highest protection' in terms of landscape and scenic beauty and where major development is unacceptable, unless in exceptional circumstances. A housing land supply shortfall is not by itself sufficient to justify harming the High Weald's natural beauty with a major development.</p>	<p>Crawley Borough Council is working closely with its neighbouring authorities to consider the unmet needs of Crawley over the Plan period. Notwithstanding this, Crawley Borough Council is not able to direct development outside of its administrative area or set the planning policy framework for these to be considered. However, the Crawley Local Plan Review acknowledges that development on the edges of Crawley's administrative boundaries has taken place over the years to varying degrees of involvement, and agreement, of CBC (including where they have been approved with outstanding objections from CBC). In such cases, much of the impact on infrastructure and strategic facilities and services, access to the countryside and visual landscape setting falls on Crawley. Crawley's proposed draft policy on urban extensions seeks to establish the expectations of the council should an urban extension or proposed development come</p>

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				<p>forward on the borough's administrative boundaries.</p> <p>Agree in relation to the AONB. The site in the AONB at Pease Pottage for 600 dwellings was approved by Mid Sussex District Council with an outstanding objection from Crawley Borough Council on the grounds of the AONB and disconnection to Crawley's infrastructure and services. At no point has it been suggested that any unmet need would be considered overflow from Crawley and would be met in the AONB.</p>
REP187/771	National Custom and Self-Build Association	Policy H7	<p>This letter includes the formal comments from the National Custom &amp; Self Build Association (NaCSBA) to the <i>Draft Crawley Borough Local Plan 2020 – 2035 Consultation June 2019</i>.</p> <p>NaCSBA's mission is to substantially increase the number of people able to build or commission their own home and they believe that opportunities should arise for prospective self and custom-builders through the Local Plan process.</p> <p>Custom &amp; Self-Build Current self-build (CSB) policy in England has evolved over the last 5 years with the Self-build and Custom Housebuilding Bill, receiving Royal Assent on 26 March 2015. The Bill is now an Act of Parliament. This Bill seeks to establish a register of prospective custom builders who are seeking a suitable serviced plot of land and requires LPAs to keep an up to date register of people within the district that wish to build their own home. NaCSBA are pleased to note that Crawley Borough Council do keep a self-build register which prospective self-builders can sign up to via the council's website.</p>	<p>Support for the principle of the policy and advisory comments noted.</p> <p>Crawley has a constrained land supply and there are limited options for these sites. The borough has additional competing land requirements including for employment and open space and these are as critical as housing.</p> <p>There is very little countryside left which could be considered suitable for house building, due to noise constraints from the airport, or public country parks and nature conservation areas/ancient woodland.</p> <p>The policy seeks to go as far as can be considered possible to support self-build and custom-build schemes coming forward within the borough. The Local Plan only looks at what planning system can do within the administrative boundaries of the LPA.</p>

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			<p>The <i>Right to Build</i> legislation clearly demonstrates how the government intends for LPAs to respond to the requirements set out in the NPPF when drawing up new Local Plans. LPAs should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self-build need in their districts. And LPAs that do not do so can expect their Local Plans to be found unsound at examination.</p> <p>The Housing and Planning Act 2016 conferred on LPAs the responsibility to:  <i>“Give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom house building in the authority’s area...”</i></p> <p>The Act established that evidence of such demand would be provided by registers which LPAs are required to keep in accordance with the 2015 Self-Build and Custom Housebuilding Act.</p> <p><b>Paragraph 61</b> of the revised National Planning Policy Framework (NPPF) sets out the requirement for Local Planning Authorities (LPA) to plan for a wide choice of high quality homes to support sustainable communities and provide greater opportunities for home ownership. It goes on to state:  <i>“The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”</i></p>	<p>Outside of this remit, the Duty to Cooperate discussions will take place, particularly in terms of unmet needs arising from Crawley and the potential for any urban extensions to include meeting the needs of self-builders in line with government expectations and policy. In addition, the council may consider to undertake a corporate approach separately in relation to its own land ownership. This would then be considered as part of the windfall element and assessed against the policies in the Local Plan accordingly.</p> <p>Additional evidence relating to the needs associated with self-build is provided by the SHMA. However, the council is mindful of the government expectation for the delivery of serviced, self-build plots to match that on the self-build register.</p>

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			<p>Furthermore, the NPPF makes clear how small and medium sized sites can make an important contribution to meeting the housing requirement of an area. The identification and promotion of small and medium sites as per the NPPF <b>paragraph 61</b> can be promoted in order to support the needs of custom and self-builders.</p> <p>Recent appeal decisions such as a proposal for the erection of up to 5 self-build dwellings at The Meadows, Bromsberrow Heath, Ledbury (APP/P1615/W/18/3213122) have highlighted and confirmed the weight that should be afforded to self-build as a material consideration in determining planning applications, which in turn demonstrates the importance of CSB in housing delivery.</p> <p>CSB in the Crawley Borough Local Plan</p> <p>Whilst NaCSBA are pleased to note that the Local Plan review does augment existing policy with specific self-build policy <b>H7</b>, it is considered that the policy does not go far enough, given the importance placed on self-build by government and national policy.</p> <p>The first part of the policy, stating that proposals for custom and self-build housing will 'be supported where it is in conformity with the other policies and requirements of this Local Plan' adds little, as CSB proposals that are in line with existing LP policies would have been supported regardless.</p> <p>The second, more substantive aspect of <b>H7</b> is again supported, however, it is also considered to be of limited effect in terms of meeting the needs of those that wish to build their own homes. Firstly, it offers just one specific type of self-build opportunity – a serviced plot on a large estate</p>	



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			<p>type development. This will appeal to only a certain type of prospective self-builder.</p> <p>In order to meet the requirements, set out by national policy therefore, it is important that the Local Plan is proactive and progressive in this area. It is not considered sufficient to simply include a policy (or a subsection of a policy) that simply 'encourages' custom- and self-build. The approach proposed by Crawley BC fails to offer serious choice to prospective custom and self-builders.</p> <p>Instead the plan must demonstrate specifically and in detail how it will ensure that the needs of custom and self-builders is to be met.</p> <p>Recommendations</p> <p>In order to do so, NaCSBA consider that a specific policy relating to CSB is required which will:</p> <ul style="list-style-type: none"> <li>• Allow custom and self-build units outside, but adjacent to, settlement boundaries where the site is sustainable and does not represent an incursion into the open countryside. Particularly where the proposal would result in the 'rounding off' of the developed form of the settlement; and/or</li> <li>• Allow custom and self-build to be developed on infill sites within the green belt and sites within villages washed over green belt (e.g. Coventry Local Plan)</li> <li>• It is considered that in order for the plan to be considered <i>Positively prepared</i> and <i>Consistent with national policy</i> at examination, it will be necessary to include at least one of the above recommendations in order to ensure that the delivery of self-build opportunities can meet the demand of those wishing to build their own home.</li> </ul>	<p>The council does not believe there are such sites within the borough which are sustainable or otherwise unconstrained.</p> <p>There are no green belt or isolated villages within Crawley.</p>

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REP188/783	Turley on behalf of Rainier Developments	Policy H1	<p><b>Policy H1: Housing Provision</b></p> <p>2.34 Given the level of constraint to the growth of Crawley Borough Policy H1 identifies a significant level of unmet housing need (approximately 6,475 dwellings) which will be met within neighbouring authorities, such as those within the Northern West Sussex Housing Market Area. While it is appreciated that the level of unmet need cannot be met within the Borough, Rainier welcomes the provisions within Policy H1 to consider all reasonable opportunities to meet housing needs, including brownfield sites such as our client's site within Crawley Town Centre. This reflects the NPPF, in particular paragraphs 117 and 138 which require plans to make as much use as possible of previously developed land, especially where it is well served by public transport.</p>	Support noted.
REP188/784	Turley on behalf of Rainier Developments	Policy H2	<p><b>Policy H2: Key Housing Sites</b></p> <p>2.35 As set out throughout these representations, the proposed development aligns with the emerging re-development of a key town centre opportunity site, Crawley Station and Car Parks – ('Station Gateway'). While not allocated as part of the Town Centre opportunity site, the proposals represent a residential led, mixed use development which is deliverable within the early years of the plan, bolstering the Council's supply early on, when some of the larger strategic allocations might not be able to so.</p>	The site promoted by the representer has been allocated as a Key Housing Site in Policy H2.
REP188/785	Turley on behalf of Rainier Developments	Policy H3d	<p><b>Policy H3d: Housing Typologies: Town Centre Residential Sites</b></p> <p>2.36 Whilst Rainier support this policy in principle, it is considered that as currently drafted the policy could potentially over burden new development and be unable to fully consider the benefits of a proposed scheme. This is</p>	Support for the principle of the policy noted.  Disagree to the proposed amendments. This flexibility is not needed in the Policy. The Local Plan will be subject to a viability assessment and, in accordance with NPPF, planning applications

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			<p>particularly relevant given that the level of unmet housing need which is being met within the wider Northern West Sussex Housing Market Area.</p> <p>2.37 Rainier consider that the policy should include added flexibility to ensure that it is able to balance the intentions of the policy against the benefits of a proposed development. This could potentially be achieved by requiring proposals to 'generally' meet or meet the 'majority of' the criteria listed.</p>	<p>which comply with them should be assumed to be viable. Any deviation from the policy-compliant position must be justified by evidence including confirming the continued need for the scheme.</p>
REP188/786	Turley on behalf of Rainier Developments	Policy H4	<p><b>Policy H4: Future Housing Mix</b></p> <p>2.38 Rainier are encouraged that Policy H4 recognises the flexibility required when assessing an appropriate housing mix for a development, with the ability for it to deviate away from the 'starting position' as set out within the table at paragraph 12.84. In the formation of an appropriate housing mix, it is important that a development scheme is able to respond to its locality and market demand.</p> <p>2.39 For example Rainier's proposals for the MOKA site are in close proximity to Crawley Train Station providing efficient local and national services as well as being a town centre location will have a much different housing mix requirement to a low rise housing development on the edge of the town centre. Clearly the imposition of a rigid housing mix could impact upon the viability and deliverability of a residential development.</p>	<p>The housing mix is set out as a starting point, to be used, subject to density and character considerations. However, there would need to be strong justification to deviate significantly from this. It is strongly expected that development schemes seek to meet the policy position first.</p> <p>In line with the new SHMA, the policy now sets out an indicative mix requirement specific to the Town Centre, which takes into account, and seeks to address, the greater bias of need towards smaller units coming forward in the town centre.</p> <p>The Local Plan will be subject to a viability assessment and, in accordance with NPPF, planning applications which comply with them should be assumed to be viable. Any deviation from the policy-compliant position must be justified by evidence including confirming the continued need for the scheme.</p>
REP188/787	Turley on behalf of Rainier Developments	Policy H5	<p><b>Policy H5: Affordable Housing</b></p> <p>2.40 It is welcomed that the policy allows for a relaxation of the affordable housing guidelines should the policy compliant level impact upon the viability of development.</p>	<p>Viability is only going to be considered a reason for relaxing the policy in exceptional circumstance. This has been clarified in the</p>

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			This provides suitable flexibility within the policy to allow sites with elements of constraint to development, such as previously developed land, to be re-developed having regard to the viability of the scheme.	policy and supporting text to reflect the national position.
REP193/801	Pegasus Group on behalf of Persimmon Homes Plc.	Policy H2	<p><b>Crawley Borough Council Local Plan Review 2020-2035 Regulation 18 Public Consultation- Representations on behalf of Persimmon Homes Plc</b></p> <p>Pegasus are pleased to submit representations to the Crawley Borough Council Local Plan Review 2020- 2035 Regulation 18 Public Consultation on behalf of our Client, Persimmon Homes Plc.</p> <p>Pegasus would like to make the following representations on the draft Plan.</p> <p><b>1. Development across the Borough</b></p> <p>1.1 Strategic Policy H2: Key Housing Sites allocates key housing sites considered to be critical to the delivery of future housing in Crawley. It identifies Forge Wood, Pound Hill as a deliverable site with 1,465 dwellings remaining to be completed over the plan period. This is a highly sustainable location which represents the last opportunity to deliver a mixed-use neighbourhood within the administrative area of Crawley. Accordingly, it is important to maximise the remaining opportunities that exist for further development in this part of the Borough.</p> <p>1.2 Pegasus Group, on behalf of Persimmon Homes would like to highlight specific parcels of land within the Forge Wood Area that are available and suitable for development.</p> <p>1.3 The Appended plan identifies the plots of land that are available and suitable for the development (shown as cross hatched against the background context of the approved Forge Wood Masterplan). Five locations identified on the</p>	<p>Comments and sites noted.</p> <p>Four of the five sites identified are in the northern part of Forge Wood and would be constrained on account of the strategy being put forward for the Regulation 19 consultation. These sites either fall within the area identified for the North Crawley Area Action Plan under Policy SD3, and/or are in locations which are beyond the 60dB threshold for the summer day wide-spaced runway 2040 contour, as shown in the Local Plan Noise Annex and Plan 31 of the Gatwick Masterplan 2019. The latter threshold is identified in Policy EP4 as the threshold for unacceptable adverse effect from aviation transport sources. Subject to further assessment of needs via the Area Action Plan, these four sites would therefore be considered unsuitable for residential development.</p> <p>The fifth site, lying to the south of phase 2D, appears less constrained by these issues, but appears to be adjacent to or overlapping with an area of Ancient Woodland and an area of structural landscaping. It may be that development of this site or part of it is suitable and achievable, but this remains unclear on the basis of information provided. Subject to more</p>

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			<p>masterplan offer an opportunity for sustainable development in line with the paragraph 8 of the National Planning Policy Framework 2019 which states that:</p> <p><b><i>overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</i></b></p> <ul style="list-style-type: none"> <li><b><i>a. an economic objective– to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types 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;</i></b></li> <li><b><i>b. 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</i></b></li> <li><b><i>c. 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.”</i></b></li> </ul>	<p>detailed proposals it may be that the site could come forward as a windfall site.</p>

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			<p>1.4 Developments in the identified locations have the potential to deliver sustainable developments which are well related to the new Forge Wood Neighbourhood and can secure additional net gains across economic, social and environmental objectives across the Borough.</p> <p>1.5 Furthermore, developments on the proposed sites will have a positive impact on housing and employment provision across the Borough and therefore proactively responding to the main objective of the Strategic Policy H1: Housing Provision. The policy states that <b><i>“the Council will positively consider proposals for the provision of housing to meet local housing needs, taking a proactive 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.”</i></b></p> <p>1.6 The Policy identifies the plan makes a provision of a minimum of 4,806 net dwellings in the borough across the plan period (2020-2035). The policy identifies a remaining unmet housing need of approximately 6,475 dwellings across the plan period. Part of this requirement will be met by neighbouring authorities. The proposed development sites put forward by Pegasus Group on behalf of Persimmon Homes will contribute to the provision of much needed housing in the area and consequently reduce the amount of unmet housing need that would otherwise be displaced elsewhere.</p>	
REP196/809	Environment Agency	Policy H3c	<b>Policy H3c Open Spaces</b> – We welcome that, for Open Space, point vi states that ‘Flood risk will not be	Support noted.

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			exacerbated elsewhere as a result of the development, and surface water drainage is maintained at greenfield runoff rate levels.' If surface water runoff could be reduce further and additional storage introduced as part of any development proposal, this would offer a greater reduction in runoff rates from new development.	The policy criteria vi. has been amended to include reference to "as a minimum", and Policy EP1 will apply to development coming forward within these housing land typologies. The supporting text to Policy H3c has been amended to include explanation behind this principle.
REP197/822	Reigate & Banstead Borough Council		<p>Thank you for the opportunity to comment on the Draft Crawley Borough Local Plan 2020-35 (June 2019).</p> <p>We appreciate that some of the key evidence base supporting the Local Plan is still being prepared and, therefore, not available for detailed review at this stage of consultation. Our comments below are therefore made in this context. We would of course welcome – at the appropriate time – the opportunity to input into and comment upon such evidence, particularly on matters of shared strategic importance as part of our ongoing obligations under the duty to cooperate.</p> <p><u>Housing</u></p> <p>We note the latest position in respect of housing needs and the likely scale of unmet needs which could arise from the Crawley Local Plan. Clearly, the scale of potential unmet needs is significant (c.6,500 homes over a 15 year period); however, we acknowledge the challenges and constraints faced by Crawley.</p> <p>Reigate &amp; Banstead also faces considerable constraints, including significant extent of Green Belt, which limits our own ability to accommodate growth. Horley, which is acknowledged as sharing some housing market overlaps with Crawley, is particularly constrained by large areas of land at risk of flooding both in and around the town.</p>	<p>RBBC Core Strategy paragraph 7.4.3 references the amount of housing to be delivered through the Core Strategy as to be meeting some of the needs from Northern West Sussex (NWS) Housing Market Area (HMA).</p> <p>The NWS SHMA continues to recognise the overlap of HMA, particularly in terms of house prices and commuting, with the strongest relationship being with Horley. In addition, reference to Horley in the Local Plan relates to infrastructure impacts from development around and close to Crawley. It is not agreed that Horley is fundamentally separated from Crawley, for example, there is information from education which confirms the cross-boundary relationship between residents of Horley attending schools in Crawley.</p> <p>Agree to amend paragraph 12.39 (now 12.27) to clarify the NWS HMA only includes a part of Reigate and Banstead borough, and not all of it.</p> <p>Support for Crawley maximising its housing delivery and introduction of minimum density standards – Noted.</p>

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			<p>Our constrained nature was acknowledged and accepted through our adopted Core Strategy (2014) which recognised we were unable to fully meet our objectively assessed needs in a sustainable manner, giving rise to a shortfall of our own of over 2,000 homes over the plan period.</p> <p>As such, whilst we are committed to maximising housing supply, as demonstrated through our recent delivery record, and to working together to understand how housing needs can be met as fully as possible, we are not in a position at this stage to accommodate any of the unmet needs which would arise from Crawley. Whilst it is appreciated that our Core Strategy recognises that migration between our respective areas (and beyond) would continue and be facilitated within our requirement of 460 homes per annum, we would reiterate that there is no specific quantified allowance for Crawley's unmet needs within our adopted plan. We would welcome additional clarity in paragraph 2.31 to acknowledge that the new neighbourhoods currently under construction around Horley are meeting Reigate &amp; Banstead's own housing needs; as currently drafted and read in the context of the preceding paragraph, it could be interpreted otherwise.</p> <p>With respect to our housing markets, we would welcome additional clarification within paragraph 12.39 to more accurately reflect the relationships which exist between our respective areas. Whilst we acknowledge and agree that, as set out earlier in the document (paragraph 2.27), there are some overlaps between the housing markets of Reigate &amp; Banstead (which is within an East Surrey HMA) and Crawley (within the Northern West Sussex HMA),</p>	



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			<p>these links are localised, particularly to our southernmost settlement of Horley which shares some characteristics of the NWS HMA but is fundamentally separated from it. As drafted, paragraph 12.39 could be interpreted as suggesting a much greater degree of interaction between our housing markets than the evidence supports.</p> <p>Given the likely scale of unmet need, we welcome and support the commitment in Policy H1 to consider all reasonable opportunities for housing development and the expression of the housing requirement as a minimum figure. Allied to this, we also strongly support the proposed application of minimum density ranges (Policy CD4) to all new development to support the most effective use of Crawley's constrained supply of land within the built up area. This approach is broadly consistent with the "urban areas first" strategy set out in our own Core Strategy.</p>	
REP197/823	Reigate & Banstead Borough Council	Policy H8	<p><u>Gypsies, Travellers and Travelling Showpeople</u></p> <p>Through our own Development Management Plan (DMP), we have sought to meet full need identified in our latest Gypsy &amp; Traveller Accommodation Assessment, including those households who meet the equalities definition but not necessarily the planning definitions within the Planning Policy for Traveller Sites. It is our expectation that our partners across Surrey and the Gatwick Diamond will seek to do likewise through their emerging Plans in order to ensure the needs of this group are properly planned for.</p> <p>The proposed allocations within our DMP, including provision on sustainable urban extensions, are capable of meeting our pitch and plot needs over the plan period in full; however, there is no surplus available to accommodate unmet needs from elsewhere.</p>	Support Noted.

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			We note the latest evidence that there is no immediate need for gypsy and traveller sites within Crawley, but that a need for 10 pitches later in the plan period is likely due to household formation. It is noted that the draft Plan proposes to meet this potential need in full through the allocation of a reserve site and we strongly support this positive approach to planning for future needs. We believe that it is important that this allocation is maintained to provide flexibility, particularly the plan acknowledges that local constraints result in <i>“limited opportunities for Gypsies, Travellers and Travelling Showpeople to bring forward sites themselves”</i> .	
REP198/841	The Ifield Society		<ul style="list-style-type: none"> <li>• <b>What types of housing and accommodation would you like to see more of in Crawley?</b> More affordable housing is critical, especially for young people and those with special needs and disabilities.</li> <li>• <b>Which groups in particular are poorly catered for by the available housing supply in Crawley?</b> Young people on low incomes, especially newly-marrieds and those with children. Rents are too high. If this problem is not dealt with social problems will rise sharply – and unexpectedly.</li> <li>• <b>What types of housing should be prioritised in new developments over the period 2020-2035?</b> Low cost, social, affordable housing e.g. Council housing. With a population of over 111,000, this town qualifies for City status and can apply for unitary status. This will open up the availability of government ‘City’ grants and funding.</li> <li>• <b>Where do you think new housing should be built over the period 2020-35?</b></li> </ul>	Support for meeting affordable housing needs noted.

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			<p>The area west of Kilnwood Vale, but <u>NOT</u> within the boundary of the ancient Parish of Ifield (see map attached) which is “Not Currently Developable” (*<b>Appendix 5 provided with original representation to support*</b>)</p> <ul style="list-style-type: none"> <li><b>If a new neighbourhood is built just outside Crawley’s boundaries, what should it include?</b></li> </ul> <p>It should include more affordable housing, but the developers have a proven track record of <u>NOT</u> providing adequately for this.</p>	
REP107/848	Town Access Group		<ul style="list-style-type: none"> <li><b>What types of housing and accommodation would you like to see more of in Crawley?</b></li> </ul> <p>More sheltered accommodation.</p> <ul style="list-style-type: none"> <li><b>Which groups in particular are poorly catered for by the available housing supply in Crawley?</b></li> </ul> <p>Wheelchair-users, especially in blocks of flats where there are regular breakdowns of the lifts.</p> <p>More sheltered accommodation for the increasing number of elderly residents.</p> <ul style="list-style-type: none"> <li><b>What types of housing should be prioritised in new developments over the period 2020-2035?</b></li> </ul> <p>Easily-adapted homes.</p> <ul style="list-style-type: none"> <li><b>If a new neighbourhood is built just outside Crawley’s boundaries, what should it include?</b></li> </ul> <p>The Crawley neighbourhood features – shops, playing field, community centre, play area etc.</p>	Support for meeting needs of wheelchair users and elderly residents noted.
REP205/909	Mid Sussex District Council	Policy H1	<p><u>Planned Housing Growth</u></p> <p>Mid Sussex has been kept informed of the updates to the Crawley and Horsham commissioned ‘Strategic Housing Market Assessment’, as part of the authorities continued joint working on housing matters.</p>	Noted.

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			Mid Sussex will continue to work together with the Northern West Sussex Housing Market Area (HMA) authorities to understand the housing need within the HMA and the extent to which this can be delivered.	
REP205/913	Mid Sussex District Council	Policy H3g	<p><u>Urban Extensions: 'At Crawley'</u></p> <p>Policy H3g: Urban Extensions and the supporting text indicates that some of Crawley's growth could be met through urban extensions. Policy H3g provides the framework by which Crawley would assess applications outside the borough boundaries but are adjacent to Crawley. Mid Sussex have a number of comments to make on this policy, which are set out below:</p> <p>It is unclear how this policy can be effective as it relates to land outside of the Crawley boundary. An application within Mid Sussex, for example, would not be assessed against the policies within the Crawley Local Plan. As such the criteria within the policy can only be considered to inform Crawley's response during the consultation process on an application within an adjoining authority; and this should be made clear.</p> <p>It is not sufficiently clear what is meant by the term 'Urban Extension', both in terms of scale and location. This is important because some criteria would not apply to all developments. For example, smaller scale sites would not support a neighbourhood centre, or require a masterplan. The preparation of a Joint Area Action Plan may not be necessary in all circumstances. This is acknowledged in the supporting text but not within the policy. Through Duty to Co-Operate discussions, Mid Sussex will continue to liaise with Crawley on any sites within Mid Sussex that would have cross-boundary impacts, particularly any that</p>	<p>Crawley is pursuing opportunities to maximise housing development within its own administrative boundaries, through identification of sites (including small sites within its own ownership) and increasing densities. It is considered Crawley is going as far as it can to meet its own needs within the tight administrative boundaries, and maintaining good quality of life levels for residents, employers and visitors and avoiding negative impacts of 'town cramming'. However, this will not meet the full housing need as required by the standard methodology and unmet need will need to be considered by authorities within the housing market area, as part of their Local Plan Review processes, and potentially beyond should this not then be sufficient alone. There is an acknowledgement in the Local Plan Review that properly planned urban extensions to Crawley may come forward through neighbouring authorities' own Local Plans, and these may then seek to meet unmet development needs arising from Crawley.</p> <p>Crawley Borough Council is working closely with its neighbouring authorities to consider the unmet needs of Crawley over the Plan period, including Mid Sussex. Notwithstanding this, Crawley Borough Council is aware that it is not able to</p>

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			<p>are promoted to the Council as part of the District Plan Review.</p> <p>The evidence prepared to support the preparation of the adopted Mid Sussex District Plan (2014 - 2031) indicated that there was some capacity for the District to accommodate some of the unmet needs of Crawley, in addition to meeting its own housing need. As such, the Mid Sussex District Plan includes a provision to provide 1,498 dwellings to meet the unmet needs of Crawley during this period. However, until the review of the District Plan is undertaken, (scheduled to commence in 2021) Mid Sussex is unable to confirm its own housing need and the extent to which the need within Mid Sussex can be met. Therefore, at this time it is not possible to confirm the extent to which Mid Sussex can continue to meet the unmet needs of Crawley. In addition, should any sites be promoted to Mid Sussex during the District Plan review in this location, they may firstly be required to meet Mid Sussex need. It would therefore be unwise for Crawley to assume that some of its unmet need can be met in Mid Sussex.</p> <p>The Sustainability Appraisal of the MSDC District Plan (August 2016) sets out the conclusions of the 'Sustainability Assessment of Cross-Boundary Options', which assessed the unmet need of all neighbouring authorities. The evidence shows that there are strong migration and commuting links between the two authorities. These links are not constrained to the areas immediately adjacent to the administrative boundaries of the authorities. Broad locations for growth were assessed based on distance and linkages between areas based on historic commuting patterns. These broad locations cover most of</p>	<p>direct development outside of its administrative area or set the planning policy framework for these to be considered, nor does it intend to set an "overspill" adjacent to Crawley. This is a matter for the individual authorities as part of their own Local Plan Reviews. This is set out in the agreed Position Statement (to be updated in the form of a Statement of Common Ground).</p> <p>However, the Crawley Local Plan Review acknowledges that development on the edges of Crawley's administrative boundaries has taken place over the years to varying degrees of involvement, and agreement, of CBC (including where they have been approved with outstanding objections from CBC). In such cases, much of the impact on infrastructure and strategic facilities and services, access to the countryside and visual landscape setting falls on Crawley. Crawley's proposed draft policy on urban extensions seeks to establish the expectations of the council should an urban extension or proposed development come forward on the borough's administrative boundaries. It also establishes CBC's clear expectations that where development is next to Crawley it should be meeting Crawley's needs (as is reflected in the Mid Sussex District Plan Policy allocation for Pease Pottage). The SHMA advises that duty to cooperate discussions should take place to inform clear policies regarding the mix of housing brought forward on sites "at Crawley" informed by</p>

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			<p>Mid Sussex, which indicate any unmet need from Crawley could be located anywhere in this District. Locations 'At Crawley' may not be the most sustainable location for growth in Mid Sussex, but until work on the District Plan Review is undertaken and all broad locations and sites are assessed, it is not known.</p> <p>In this context, we cannot support the wording of paragraph H3g: Urban Extensions and paragraph 12.79 where it refers to any urban extension on the edge of Crawley and within MSDC should be meeting the unmet needs arising from Crawley.</p>	<p>the SHMA and should take into account the profile of Crawley's housing needs and consider how affordable housing will be allocated. It is considered reasonable that where sites are meeting or contributing to meeting the housing needs of Crawley, they should take account of the nature of Crawley's housing need. CBC welcomes ongoing positive and effective discussions with Mid Sussex as part of the Plan making process to agree the most appropriate approach this should take.</p> <p>However, CBC maintain that as there is a high housing need arising from Crawley and land is scarce, any development of land immediately adjacent to Crawley should not be used if not able to meet any of Crawley's needs at all.</p> <p>Mid Sussex's physical and policy constraints, and own housing needs, are acknowledged and the district's ability to meet unmet needs arising from Crawley will form part of the District Plan Review.</p>
REP209/936	Horsham District Council	Policy H1	<p><b>Housing</b></p> <p>We recognise that your bound administrative area presents challenges in meeting the identified housing needs of Crawley in the period to 2035. We are therefore pleased to see that the draft plan has sought to identify a number of different mechanisms by which the standard housing methodology figures as calculated for Crawley Borough could be achieved. We note that this covers a range of approaches, including through increased densities, estate regeneration, the development of any surplus open spaces,</p>	<p>Support for Crawley maximising its housing delivery welcomed. Further detailed assessments of sites have been undertaken and Crawley's supply figure has been increased. Ongoing liaison with HDC will continue as part of Housing Market Area and Duty to Cooperate discussions.</p>

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			<p>town centre development and upward extensions, increased building heights and garden sites.</p> <p>What is not clear to us at this stage is the extent to which the potential yield that such approaches could generate over the plan period has been considered, and whether there is potential for this to assist housing delivery, particularly in the latter part of the plan period. Given the very significant levels of housing need for Crawley as well as Horsham District (and the wider north west Sussex authorities as a whole), it will be important to ensure that 'no stone is left unturned' in considering how the additional housing could be delivered. Although we recognise this may not be a straightforward exercise, we would request that further examination of the likely extent and timing of such delivery is undertaken as far as is possible. For example, it may be possible to identify older estates where renewal schemes might come forward. In addition, an examination of existing rates of loss of garden development / surplus open space together with any emerging evidence on sports and open spaces could help to predict if other land can be converted over the plan period. Further work and consideration of the potential location and extent of any densification would also be welcome to establish the potential delivery of additional housing through this mechanism. It is also suggested that the flexibility of the town centre policy TC3 could be improved by reflecting the statement in para 11.22 that the currently identified sites are not comprehensive, for example by adding wording along the lines of "or other opportunity areas which are identified" in the first line of paragraph 3.</p>	


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REP209/937	Horsham District Council	Policy H3g and Para. 12.75	<p>Our own Local Plan Review is underway, and our own Regulation 18 documentation is scheduled for consultation in February and March of 2020. Land on the edge of Crawley Borough, but within our administrative boundaries has been put forward to Horsham District Council for consideration as a future location for housing growth. At this stage, no decisions have been made in relation to these sites or any supporting infrastructure such as the proposed relief road.</p> <p>A key requirement of the NPPF is that Local Authorities ensure that they can meet their own development needs, including affordable housing provision and taking account of infrastructure provision and viability issues. This is therefore the starting point for the preparation of our own Local Plan, before we then consider how we can meet the needs of others, to ensure that we can prepare a sound plan.</p> <p>We recognise that in the event that land is allocated on the edge of Crawley that this will have impacts for the town, and presume this has influenced your thinking in the development of Policy H3g. Horsham District Council is committed to ongoing discussions with Crawley Borough during our plan preparation process.</p> <p>We note that paragraph 12.75 states that the purpose of Policy H3g is to inform your discussions with neighbouring authorities as it relates to land outside the Crawley administrative area. This statement is welcome. However we are concerned that as this wording comes after the policy this important point may not be totally explicit to everyone who reads your plan. To ensure that the context of Policy Hg3 is completely clear, we would ask that the</p>	<p>Support and recognition for the purpose of the Policy is welcomed.</p> <p>CBC welcome HDC's confirmation they are committed to ongoing discussions with CBC during the preparations for the Horsham Local Plan Review.</p> <p>Suggestion agreed – Paragraph 12.75 has been moved to now come before the policy, rather than forming the first paragraph of the reasoned justification. This establishes up-front the different purpose of this policy. However, through Duty to Cooperate and positive, effective strategic planning, it is anticipated it will form a useful starting point for any future discussions regarding developments and allocations for developments on Crawley's administrative boundaries.</p>



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			wording of this paragraph is brought forward and placed before the policy.	
REP210/938	Resident 9	Policy H2	<p>I am against building of homes on Playing Fields at Breezehurst Drive, Bewbush. Bewbush playing fields are natural beauty which everybody enjoys all year round. Playing fields are life line for people of Bewbush. Homes on green fields will turn Bewbush into concrete jungle and it will Traffic Jams.</p> <p>Homes on Green fields will cause anti-social violence. It will cause extra burden on Schools and health and wellbeing of Bewbush residence. Doctors Surgeries are struggling to cope as things are already, at breaking point.</p> <p>Please end housing on Bewbush playing fields, Bewbush playing fields are on Flood zone area. When it rains the playing fields turn into swimming pool.</p> <p>Please throw the plan to build homes in Bewbush playing fields into bin where it belongs.</p> <p>10 years ago, Crawley Council said no homes will be built on Green fields in Bewbush. Crawley Council broke their PROMISE. Then Crawley Council said, homes will be built on site of Bewbush leisure centre, instead Crawley Council destroyed 100 trees and build homes on complete Playing field, against wishes of people of Bewbush.</p> <p>This letter is objection to building of homes on Playing fields at Breezehurst Drive, Bewbush.</p> <p>I urge everybody, don't make grave mistake of building homes on Playing fields.</p> <p>I await your reply of good news that no homes or flats will be built on Green fields of Bewbush.</p>	<p>The Breezehurst Playing Fields "Key Housing and Open Space" site allocation was established through the adopted Local Plan. Subsequently the council has adopted an associated Development Brief to support and advise further on the policy requirements for the development of this site.</p> <p>Crawley has a high housing need, which cannot be met in full within the administrative boundaries. Therefore, it is important that the council can demonstrate it is doing all it can to maximise housing delivery within the borough's administrative boundaries, and is indeed being challenged by neighbouring authorities and other individuals that it must increase this number further and leave "no stone unturned". This has included undertaking an open space and playing pitch study. This confirmed there was surplus supply of playing fields in Bewbush which offered the opportunity to rationalise provision in return for improving quality of the remaining pitches, following which the policy allocation requiring retention and replacement and enhancement of playing pitch provision was established alongside the housing development on part of the allocated site.</p>
REP/211/943	Natural England	Policy H2	<p><b>H2 Key Housing Sites</b></p> <p>We note that the proposed sites are unlikely to have negative impacts on any designated sites.</p>	

<b>HOUSING DELIVERY: HOUSING</b>				
<b>Representor/ Representation Reference</b>	<b>Name/ Organisation</b>	<b>Policy/ Para/ Page No.</b>	<b>Comments</b>	<b>CBC Response</b>
			<p>However, many of the proposed allocation sites encompass or are in close proximity to ancient woodland parcels. We strongly recommend any such allocations have specific requirements that any proposal must significantly conserve and enhance relevant ancient woodland parcels, in line with the aims of the NPPF (175.) and the Government's 25 year environment plan (1.4).</p> <p>For example the Forge Wood, Pound Hill allocation looks to contain many parcels of ancient woodland; these should not only be protected but the development should provide enhancement measures such as native species planting to increase connectivity between parcels.</p>	

ENVIRONMENTAL SUSTAINABILITY: GREEN INFRASTRUCTURE & BIODIVERSITY				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
REP97/256 (repeat)	West Sussex County Council Asset Management and Estates Team	GI3	<p><b>1. Regarding Items:</b>            (6) The Oaks Primary School            (9) Holy Trinity CE School            (11) Our Lady Queen of Heaven School            (13) Milton Mount Primary School            (14) Oriel High School and The Brook School            These sites are operational school playing fields under the ownership of West Sussex County Council. The fields are an integral and functional part of the schools. The Council, as Education Authority, has a statutory obligation to ensure that every child living in West Sussex is able to access a mainstream school in the county. Should there be a future requirement to create additional spaces at any of the schools in the planning area this would be in accordance with statutory obligations and a 'Biodiversity Opportunity Area' or 'Structural Landscaping' designation would serve to compromise the Councils ability to meet this need.</p> <p><b>We therefore wish to object to proposals that the school playing are included as a 'Biodiversity Opportunity Area' or as 'Structural Landscaping', for the reasons set out above, namely that they are already protected due to their status, and that there may be a future requirement to increase the capacity of the schools to accommodate additional children.</b></p> <p><b>2. Regarding Item (15)</b> Land to the south of Cheals Roundabout appears to be designated as a 'Biodiversity Opportunity' – please advise. This is held by West Sussex County Council on behalf of our highways department and therefore unavailable for an alternative allocation.". It is land that is required to ensure that the road remains safe and can be well maintained. Future highways requirements are as yet unknown. However, we would be concerned if the land became unavailable for any necessary future improvements to take place due to the current designations"</p>	<p>These designations have been carried forward from the adopted Crawley Borough Local Plan. They are based on factual evidence and studies undertaken to identify the existing character and purpose of the land.</p> <p>The requirements associated with the designations are set out in the existing and draft Policies (existing Policy CH7: Structural Landscaping &amp; Policy ENV2: Biodiversity; draft Policy LC1: Structural Landscaping &amp; Policy GI3: Biodiversity Sites).</p> <p>The council does not agree that these designations should be removed, nor consider they compromise the county council's ability to meet the needs for securing additional spaces at any of the schools in the planning area, or meet the needs of the Highways Authority. However, the policies are clear that development should not be at any cost and the existing character would need to be taken into account in the design and landscaping of proposals. In addition, the policies also support</p>

ENVIRONMENTAL SUSTAINABILITY: GREEN INFRASTRUCTURE & BIODIVERSITY				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>(15)The land to the north of Cheals roundabout appears to be designated as 'Structural Landscaping'. Again, please advise and clarify This land is also owned by WSCC, and is <b>being held to fulfil future strategic requirements</b>.(?)</p> <p><b>To resolve our concerns, we request removal of the areas of WSCC owned land known to the north and south of Cheals Roundabout (item 15) in Crawley from the proposed list of designated areas of Structural Landscaping or Biodiversity Opportunities as identified in the Local Plan.</b></p> 	<p>the government's expectation for securing "biodiversity net gain".</p> <p>The Biodiversity Opportunity Areas were identified originally by WSCC; now these are managed by the Sussex Biodiversity Record Centre across Sussex authorities.</p>
REP105/297	The British Horse Society	G11	<b>Strategic Policy G11: Green Infrastructure (page 169)</b>	Multi-functional is defined in paragraph 13.8 (now 14.8)

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			The overall aims of this Policy are very good, as Green Infrastructure is increasingly viewed as important to the health and well-being of communities. However bullet point v) again refers to a 'multi-functional network' providing opportunities for walking and cycling only. PRow are 'green corridors' that can also provide opportunities for new routes/links for horse riders (also vulnerable road users), and this should be acknowledged.	referring 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. Policy OS3 is the more specific Public Rights of Way policy.
			<ul style="list-style-type: none"> <li><b>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?</b></li> </ul> <p>Conservation areas</p>	These are important and Crawley currently has eleven Conservation Areas designated because they are 'areas of special architectural or historic interest, the character or appearance of which is desirable to preserve or enhance.' There are elements of Green spaces within them, but the primary consideration is on their architectural or historic interest, with the visual amenity e.g. natural capital having a further important role in this aspect.
REP162/560	Sussex Ornithological Society		<p><b>Chapter 13 Green Infrastructure and Biodiversity</b></p> <p>16. The NPPF is very clear that a net gain in biodiversity should be delivered as part of any new development. A <u>net</u> gain is a loss which is more than offset by a gain in biodiversity. i.e to claim a net gain the losses in biodiversity and the gains in biodiversity need to be separately assessed and the arithmetic done to see whether the result is a net gain (or a net loss). So a single biodiversity gain (such as improvements in the quantity of pollinating plants) cannot be interpreted as a <u>net</u> gain in biodiversity. True it may be a gain, but the losses due to development also need to laid out using the latest records from the Sussex</p>	Information noted. Suggestions such as green roofs and green walls are included in the GI policies in order to offer non surface alternatives to present net gain solutions in urban areas such as Crawley.

ENVIRONMENTAL SUSTAINABILITY: GREEN INFRASTRUCTURE & BIODIVERSITY				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>Biodiversity Records Centre plus ecological surveys, and the gains in biodiversity (such as steps to increase pollinating plants) need to be set beside the losses and the net result calculated. Any development proposal which does not lay out the biodiversity losses caused by the development should therefore not be approved.</p> <p>17. We recognise that because of the built up nature of Crawley it will be difficult in many cases for Crawley to deliver net biodiversity gains within the boundaries of Crawley.</p> <p>18. We therefore believe that Crawley should be talking to neighbouring Councils about implementing wildlife initiatives in adjoining Local Authority areas which will deliver substantial improvements in biodiversity, in the same way that they are currently talking to them about housing overflows under the Duty to Co-operate. Only if such strategic wildlife initiatives outside Crawley are developed do we believe that the NPPF objective of creating a net gain in biodiversity can be delivered by new developments in Crawley. Without such wildlife initiatives by adjacent Councils, funded by Crawley S106 monies, we cannot see how Crawley will be able to deliver an overall net gain in biodiversity over the plan period.</p> <p>19. Recognising that development must occur, the SOS is very willing to participate in identifying and developing strategic wildlife projects that will deliver real gains in biodiversity, thus delivering the NPPF's objectives of building more houses and delivering a net gain for biodiversity (including birds).</p> <p>20. In terms of the Local Plan (and the Sustainability Appraisal) the term "Sites of Nature Conservation Importance" are widely used throughout both documents, including in 13.15. SNCI's no longer exist. All SNCI's are now referred to as Local Wildlife Sites (LWS) and both documents need to be updated to say this.</p>	<p>The establishment of cross boundary connecting green infrastructure has been acknowledged through responses to this consultation and implemented into supporting text for GI1.</p> <p>The priority of Policy GI2 is to secure 10% net gain in biodiversity on site. Should this not be possible, the aim will then be to identify appropriate projects within the borough to improve the biodiversity of Crawley. The council does not accept that only wildlife initiatives outside Crawley can meet the NPPF objective.</p> <p>The SOS support in identifying projects within Crawley would be welcomed.</p> <p>Text amended</p>

ENVIRONMENTAL SUSTAINABILITY: GREEN INFRASTRUCTURE & BIODIVERSITY				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
REP162/561	Sussex Ornithological Society	Policy G11	<p><b>Policy G11 (Green Infrastructure)</b></p> <p>21. We support the inclusion of a distinct green infrastructure policy but we suggest that its wording could go further to recognise the importance of Green Infrastructure, and to take a cross boundary approach to matters relating to GI. We therefore propose the following amendments:</p> <p><i>'Crawley's multi-functional green infrastructure network will be conserved and enhanced through the following measures:</i></p> <ul style="list-style-type: none"> <li><i>i. Development which protects and enhances green infrastructure will be supported;</i></li> <li><i>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;</i></li> <li><i>iii. Proposals which reduce, block or harm the functions of green infrastructure <del>will be required to be adequately justified,</del> <b>should be avoided and mitigate against any loss or impact or as a last resort compensate to ensure the integrity of the green infrastructure network is maintained;</b></i></li> <li><i>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;</i></li> <li><i>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;</i></li> <li><i>vi. <b>All opportunities should be taken to link Green Infrastructure along the boundary of Crawley with Green Infrastructure in adjacent Council Districts so that a Green Infrastructure network continuously extends across Council boundaries.</b></i></li> </ul>	Policy text has been amended in part.

ENVIRONMENTAL SUSTAINABILITY: GREEN INFRASTRUCTURE & BIODIVERSITY				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<i>vii. Large proposals will be required to provide new and/or create links to green infrastructure <del>where possible</del>.</i>	
REP162/562	Sussex Ornithological Society	Policy G12	<p><b>Policy G12 (Biodiversity and net gain)</b></p> <p>22. Section 13.17 of the plan refers to biodiversity net gain with the third line in this section stating '<i>where possible</i>'. This caveat should be removed as it is not in line with the requirements of the NPPF (paragraph 170).</p> <p>23. In line with our comments in 16 to 18 above, we would suggest the following amendments to the wording of the first paragraph of Policy G12 <i>All development proposals will be supported by ecological information to ensure that the current biodiversity value of the site is calculated. Development proposals that do not do this will not be considered. All development proposals will be expected to incorporate features to encourage biodiversity <del>where appropriate</del>, and <del>where possible</del> 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 measurable 'net gain' in biodiversity. Where this cannot be achieved locally plans to deliver it elsewhere (either in Crawley or in neighbouring council districts) must be put forward.</i></p>	<p>Policy text has been amended and references the Government's Environment Bill 2019.</p> <p>Disagree with additional wording proposed as this is for the council to consider.</p>
REP162/563	Sussex Ornithological Society	Policy G13	<p><b>Policy G13. (Biodiversity Sites)</b></p> <p>24. SOS believes that this policy could be further improved with the following amendments to the first two paragraphs: <i>'Up to date Hhabitat and species surveys and associated reports will be required to accompany planning applications which may affect biodiversity either in the areas listed below or sites showing likely ecological value' based on past ecological surveys.</i></p> <p><u>Hierarchy of Biodiversity Sites</u> <i>To ensure a net gain in biodiversity, the following areas and their supporting and connecting habitat will be conserved and enhanced</i></p>	<p>Policy G13 amended for the first and last of these three suggestions.</p> <p>The second suggestion for specifying "biodiversity" is not considered to be a helpful trigger for this policy, as the surveys and reports required will confirm whether biodiversity is affected, and these should be prepared</p>



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			<i>where possible and the council will support their designation and management:</i>	where planning applications may affect the areas or sites.
REP177/666	The Woodland Trust	Policy GI1	<p><b>Green Infrastructure &amp; Biodiversity</b></p> <p>Policy GI1 – We note the references to ancient woodland in section 13.15 in line with NPPF para 175c. We recommend the following policy wording:</p> <p><i>Ancient woodland, veteran trees and development</i></p> <p><i>i. 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.</i></p> <p><i>ii. As ancient woodland and ancient or veteran trees are irreplaceable, discussions over possible compensation should not form part of the assessment to determine whether the exceptional benefits of the development proposal outweigh the loss.</i></p> <p><i>iii. Ancient wood pasture and historic parkland should receive the same consideration as other forms of ancient woodland. The protection of the whole habitat is necessary even though tree cover may be comparatively sparse. Development on open space between trees in an area of ancient wood pasture or historic parkland should not be permitted.</i></p>	Comments noted. Text regarding Ancient woodland is set out in paragraph 13.34 (now 14.34).
REP177/667	The Woodland Trust	Policy GI3	Policy GI3 – We welcome the inclusion of explicit protection for ancient woodland in line with the NPPF. We note that a buffer zone between development and ancient woodland will be required in line with Natural England Standing Advice. We advise that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.	Any planning application that could affect ancient woodland will be required to have regard to nearby ancient woodland in accordance with Natural England's standing guidance.
REP184/727	Sussex Wildlife Trust	Policy GI1	Section 13 – Green Infrastructure and Biodiversity Strategic Policy GI1: Green Infrastructure	Support for GI policy noted.

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			<p>We are supportive of the inclusion of a distinct green infrastructure policy. SWT feels that it demonstrates recognition of the value this infrastructure plays in a multitude of delivery areas, within and across the boundaries, of the borough. Whilst SWT sees the justification of a policy for a progressive plan that seeks to deliver towards the climate change resilience, we suggest that its wording could go further to recognise the importance of cross boundary matters relating to GI. We therefore propose the following amendments in line with section 171 of the NPPF 2019 :</p> <p>‘Crawley’s multi-functional green infrastructure network will be conserved and enhanced through the following measures:</p> <ul style="list-style-type: none"> <li>i. Development which protects and enhances green infrastructure will be supported;</li> <li>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;</li> <li>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;</li> <li>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;</li> <li>v. Proposals should maximise the opportunity to maintain and extend green infrastructure links to form a multifunctional network of open space, providing opportunities for walking and cycling, and connecting to the urban/rural fringe and the wider countryside beyond;</li> </ul>	<p>Policy GI1 amended to incorporate this suggestion. Paragraph 13.15 (now 14.15) has been updated to include LWS.</p>

ENVIRONMENTAL SUSTAINABILITY: GREEN INFRASTRUCTURE & BIODIVERSITY				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p><b>vi. Cross Boundary matters relating to Green Infrastructure should be considered and incorporated at the early stage of an application</b></p> <p>vii. Large proposals will be required to provide new and/or create links to green infrastructure where possible.</p> <p>Further to these amendments we seek the inclusion of Local Wildlife Sites (LWS) under bullet point f in section 13.15.</p>	
REP184/728	Sussex Wildlife Trust	Para. 13.17	<p>Strategic Policy: G12 Biodiversity and Net Gain</p> <p>Section 13.17 of the plan refers to biodiversity net gain with the third line in this section stating 'where possible'.</p> <p>This caveat should be removed as it is no longer in line with the requirements of the NPPF (paragraph 170):</p> <p>'Crawley Borough Council is committed to halting the overall decline in biodiversity by ensuring that development minimises impacts on biodiversity and provides net gains <del>where possible</del>, including establishing coherent ecological networks that are more resilient to current and future pressures.'</p> <p>It is imperative that the policy and guidance is clear that net gain is required <u>in addition to</u> mitigation and compensation that is required through the mitigation hierarchy.</p>	Paragraph 13.17 (now 14.21) has been amended.
REP184/729	Sussex Wildlife Trust	Policy G12	<p>Strategic Policy G12: Biodiversity and Net Gain</p> <p>The clear aim of this policy should be to set out the council's commitment to ensuring that over the lifetime of the plan there is a measurable net gain to biodiversity through all development. We are supportive of this approach as it reflects the aspirations of the NPPF (particularly paragraph 170). As a result, CBC will need to ensure they are clear on their biodiversity assets at the start of the plan period, so that the monitoring proposed in the sustainability appraisal can clearly demonstrated if they have achieved this.</p> <p>It is important to recognise the plan period will result in changes to biodiversity as ecosystems shift and change over time. Therefore in</p>	Comments noted. It is felt that the wording as in the Regulation 19 Draft is appropriate.

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>order to achieve the clear requirement to deliver net gains to biodiversity the council will need to have clear understanding from the outset about the biodiversity value of the sites proposed in a planning application, the ecosystem services it is delivering and the sites context in the wider network in order to understand its function. Therefore, we suggest that the policy needs to recognise the importance of understanding the baseline for biodiversity on an applications site and its surroundings to ensure that measurable net gains are achieved.</p> <p>We suggest that this policy could be worded more positively from the outset and therefore suggest the following amendments to the first paragraph:</p> <p><i>All development proposals will be <b>support by ecological information to ensure that the current biodiversity value of the site is calculated. All development proposals will be</b> expected to incorporate features to encourage biodiversity <del>where appropriate</del>, and <del>where possible</del> 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 <b>measurable</b> 'net gain' in biodiversity.</i></p> <p>The methods used to calculate measurable biodiversity net gains are emerging and it is fair to say that they will no doubt develop over the lifetime of the plan. Therefore the specifics of how the council wish to calculate the gains may be best explained in the support text and or any future SPDs to this policy.</p> <p>In relation to the reason justification we think it is important to ensure that while the plan acknowledges and incorporates the pollinator strategy, both at national and West Sussex scale, the local plan should seek to deliver net gains for a variety of habitats and species as appropriate to the location of development.</p>	
REP184/730	Sussex Wildlife Trust	Policy G13	Strategic Policy G13: Biodiversity Sites	Any planning application that could affect ancient woodland will

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>SWT welcomes the acknowledgement that sites designated for their biodiversity value are recognised and protected in line with NPPF paragraphs 171 and 174. However, the function, connectivity and subsequent climate resilience should also be recognised in this policy. We therefore recommend the following amendments:  <b>'Up to date Habitat</b> and species surveys and associated reports will be required to accompany planning applications which may affect <b>biodiversity either in the</b> areas listed below or sites showing likely ecological value' <del>based on past ecological surveys.</del></p> <p><u>Hierarchy of Biodiversity Sites</u>  To ensure a net gain in biodiversity, the following areas <b>and their supporting and connecting habitat</b> will be conserved and enhanced <del>where possible</del> and the council will support their designation and management:</p> <ol style="list-style-type: none"> <li>Nationally designated sites: <ul style="list-style-type: none"> <li>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.</li> </ul> </li> <li>National Planning Policy Framework Sites <ul style="list-style-type: none"> <li>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.</li> </ul> </li> </ol> <p>Locally designated sites, and habitats and species outside designated sites:</p> <ul style="list-style-type: none"> <li>Local Nature Reserves</li> <li>Local Wildlife Sites</li> <li>Nature Improvement Areas</li> </ul>	<p>be required to have regard to nearby ancient woodland in accordance with Natural England's standing guidance.</p>

ENVIRONMENTAL SUSTAINABILITY: GREEN INFRASTRUCTURE & BIODIVERSITY				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<ul style="list-style-type: none"> <li>Habitats of Principle Importance identified in S41 of the Natural Environment and Rural Communities Act</li> <li>2006 or Biodiversity Action Plans</li> <li>Biodiversity Opportunity Areas</li> <li>Where Protected Species are present</li> <li>Where Species of Principal Importance are present, as identified in S41 of the Natural Environment and</li> <li>Rural Communities Act 2006.'</li> </ul>	
REP184/731	Sussex Wildlife Trust	Policy GI4	<p>Strategic Policy G14: Local Green Space</p> <p>We welcome the inclusion of this policy as Local Green Spaces can serve many functions for local communities, as well as acting as a valuable area of Natural Capital for the Borough. While we are not in a position to currently identify further local green spaces, we do encourage the council to ensure that the local community is consulted with to ensure these valuable spaces are identified and protected.</p>	Support noted. Residents were asked for any sites to be considered for Local Green Space designation as part of the online survey/paper questionnaire.
REP185/741	Carter Jonas on behalf of Homes England	Policy GI2	<p><b>Strategic Policy GI2: Biodiversity and Net Gain</b></p> <p>Whilst Homes England supports this policy, we suggest that a specific requirement to achieve a 10% net gain for biodiversity should be included in the policy. This requirement will be included as part of the Environmental Bill which will be introduced later this year and to ensure the policy is up to date and relevant upon adoption, we suggest the first paragraph should be reworded as follows (additions in italics):  <i>All development proposals will be need to achieve a 10% net gain for biodiversity in accordance with the Government's Environmental Bill (2019). expected to incorporate features to encourage biodiversity where appropriate, and where possible enhance existing features of nature conservation value within and around the development.</i></p> <p>Homes England also suggests the wider policy again needs to reflect the wording within the Environmental Bill and suggests the second paragraph is reworded as follows:</p>	<p>Policy GI2 has been amended to incorporate the majority of these comments.</p> <p>Comments regarding financial contributions and bird strike have also been noted.</p>

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>In the first instance, net gain for biodiversity <i>is expected to achieve the 10% net gain onsite. will be expected to achieve the 10% net gain on-site be achieved on-site.</i> Only where it is clearly justified this is not practicable to achieve <i>on-site</i>, 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 <del>be agreed. which will paid into the Government's central fund for nature improvements.</del></p> <p>In terms of the reference to early discussions taking place with GAL to minimise the risk of bird strikes, Homes England generally supports this approach. However, it is considered that in some instances and to ensure a 10% net gain on-site (the preferred approach), there should be a degree of flexibility within the policy. It is therefore suggested the section of the policy is reworded as follows: Discussions with Gatwick Airport Limited in relation to planting and management to minimise <i>as far as possible</i> the risk of bird strikes should be held at an early stage of landscape design, in accordance with Policy CD7.</p>	Disagree that financial contributions should simply be paid into the Government's central fund, as the council will seek to fund local priorities first.
REP185/742	Carter Jonas on behalf of Homes England	Policy GI4	<p><b>Strategic Policy GI4: Local Green Space</b> Homes England agrees with the Council's evaluation of the value and role of Ifield Brook Meadows and Rusper Road Playing Fields. However, Homes England does not agree with the approach suggested in the policy that any development in this area should satisfy a test of "very special circumstances" as this approach is not consistent with the wording in the NPPF at paragraph 101 where it states that the 'policies for managing development within a Local Green Space should be consistent with those for Green Belts'. The policy as written focuses on solely the VSC element of national Green Belt policy and makes no reference to their being certain forms of development which are not inappropriate development provided they preserve its openness and do not conflict with the purposes of including land within it including <i>'local</i></p>	Disagree – GI4 is an adopted policy. Ifield Brook Meadows and Rusper Road Playing Fields is a very special area for Crawley, designated as such due to its particular qualities in terms of nature, heritage, recreation, landscape, tranquillity and access to the wider countryside. Local green space is a particular designation, and whilst GB policies apply, it doesn't negate the opportunity for local policy to

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p><i>transport infrastructure which can demonstrate a requirement for a Green Belt location'</i> (paragraph 146).</p> <p>The tests therefore need to be consistent with the protection of the Green Belt as a whole and not simply stating a need to pass the VSC test.</p> <p>Furthermore, as drafted, this policy is not consistent with the guidance in H3g x. and xii. and would frustrate this policy objective. Homes England therefore considers the final part of the policy should read <i>"the above area will be safeguarded from development unless it accords with the policies within the NPPF with regards the protection of the Green Belt"</i>.</p>	reflect the particular reasons why the specific site is valuable.
REP186/766	CPRE Sussex		<p><b>Green Infrastructure Chapter Consultation Questions:</b>  <b>Do you think biodiversity net gain should be a priority on new development sites?</b></p> <p>Section 13.17 of the plan refers to biodiversity net gain with the third line in this section stating 'where possible'. This caveat should be removed as it is no longer in line with the requirements of the NPPF (paragraph 170.) CBC will need to ensure it has sufficient evidence of existing biodiversity assets at the start of the plan period, so that the monitoring proposed in the sustainability appraisal can clearly demonstrate if a net gain has been achieved.</p>	<p>Paragraph 13.17 (now 14.21) has been amended.</p> <p>It is recognised that a baseline measurement of biodiversity assets is required to accurately monitor if a net gain is being achieved.</p>
REP186/767	CPRE Sussex	Policy GI1	<p><b>Policy GI1: Green Infrastructure Consultation Questions:</b>  <b>Is this policy still valid? Is the policy sufficiently clear?</b></p> <p>Please see our response to the Sustainable Development Chapter Consultation Questions - we would like to see further information about how Green Infrastructure will be explored across LPA boundaries.</p>	Comment noted.
REP196/821	Environment Agency		<p><b>FISHERIES, BIODIVERSITY AND GEOMORPHOLOGY</b></p> <p>The plan adequately refers to the need to avoid impacts to biodiversity through development and the need to ensure that biodiversity is protected and enhanced. It also makes reference to biodiversity net gain.</p>	<p>Support noted.</p> <p>Buffers to waterways are considered in the Green Infrastructure Supplementary Planning Document</p>



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			Further detail could be considered with regard to rivers, for which off-site compensation is not always possible or feasible, and maintains a break in the ecological corridor that the river constitutes. Ideally, all development along rivers will work towards restoring adequate buffer zones and ensuring that rivers are enhanced through all development.	
REP198/840	The Ifield Society		<ul style="list-style-type: none"> <li>• <b>Do you think biodiversity net gain should be a priority on new development sites? How do you think this could be done?</b> Yes biodiversity should be a priority, especially regarding the Homes England 'West of Ifield' plans. This biodiversity can be achieved by establishing an Ifield Park Nature Reserve (linking Ifield Brook Meadows with Ifield Mill and Millpond) plus Heritage Centre.</li> <li>• <b>What would encourage you and your community to support habitat creation?</b> If a Nature Reserve was encouraged in Ifield, then more people would be encouraged in the community to support habitat creation (<b>*Appendix I, 3 &amp; 4 provided with original representation to support*</b>)</li> <li>• <b>What resources could be needed to promote pollination plans within local communities?</b> The resources relating to a Nature Reserve.</li> <li>• <b>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?</b> Ifield Brook Meadows already has a designation of Local Green Space (LGS). The designation of a Local Nature Reserve (LNR) is proposed (<b>*Appendix 1, 2, 3, 4 &amp; 7 provided with original representation to support*</b>)</li> </ul>	Support noted.  Comments noted.
REP211/944	Natural England	GI1	<b>GI1 Green Infrastructure</b> We strongly support the requirements of this policy to conserve and enhance Crawley's GI network and GI being afforded "the highest protection".	

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>We also support the requirement of proposals to provide links to and create new GI.</p> <p>However, we recommend a change in wording (detailed below) for point vi to strengthen this policy.</p> <p><i>“<del>Large</del> All proposals will be required to provide new and/or create links to appropriate green infrastructure <del>where possible.</del>”</i></p>	
REP211/945	Natural England	GI2	<p><b>GI2 Biodiversity and Net Gain</b></p> <p>We strongly support this policies expectation of all proposals to encourage biodiversity and demonstrate how it will secure Net Gain, which is in line with the NPPF (paragraphs 8. 170. 174. &amp; 175.) and the Government’s 25 year environment plan’s aims (1.1.).</p> <p>We support your authority considering financial contributions as an effective method of delivering meaningful Net Gain for proposals which are not achievable on site. We would advise that financial contributions should still deliver like for like net gains.</p> <p>However, we recommend a change in wording (detailed below) to strengthen this policy.</p> <p><i>“All development proposals will be expected to incorporate features to encourage biodiversity <del>where appropriate.</del>”</i></p> <p>See Annex A for further advice on Net Gain</p> <p><b>Green infrastructure (GI):</b></p> <p>GI is a strategically planned and delivered network comprising the broadest range of high quality green spaces and other environmental features.</p> <p>It should be designed and managed as a multifunctional resource capable of delivering those ecological services and quality of life benefits required by the communities it serves and needed to underpin sustainability. Its design and management should also respect and enhance the character and distinctiveness of an area with regard to habitats and landscape types.</p>	

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>GI includes established green spaces and new sites and should thread through and surround the built environment and connect the urban area to its wider rural landscape. Consequently it needs to be delivered at all spatial scales, accommodating both accessible natural green spaces within local communities and often much larger sites in the wider countryside.</p> <p>Incorporating GI concepts into your Local Plan will enable effective communication of your Crawley's needs to developers using the most recent environmental planning terminology.</p> <p>Further information on GI can be found in Natural England's green infrastructure guidance available at:  <a href="http://publications.naturalengland.org.uk/publication/35033">http://publications.naturalengland.org.uk/publication/35033</a></p> <p>GI is a key concept within the NPPF and the requirement to incorporate GI into your Local Plan is driven by the NPPF in paragraphs 20. 91. 150. 171. &amp; 181. As well the Government's 25 year environment plan in chapter 3 section 3.i.</p> <p><b>Natural capital</b></p> <p>Natural Capital is a concept which assigns monetary value to natural assets and the ecosystem services they provide, the value of natural capital assets can be from a physical products generated or the value of the service they provide.</p> <p>Natural capital assets can be any asset which is natural or semi-natural, from street trees to arable fields and even whole habitats such as a woodland.</p> <p>A single asset may generate is value from a number of sources; for example a woodland has a clear value as a timber product but while the woodland is growing it provides valuable services such as carbon sequestration, recreation, nutrient cycling and air/water quality management.</p> <p>Incorporating natural capital concepts into the Local Plan will enable more efficient communication of Crawley's needs to developers, using the most recent environmental planning terminology. Furthermore</p>	

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			<p>having a larger stock of natural capital assets will be only positive for Crawley and its residents/visitors.</p> <p>The requirement to incorporate natural capital into your Local Plan is driven by the NPPF in paragraphs 170. 171. As well as being a key concept within the Government's 25 year environment plan being ubiquitously mentioned throughout its length</p> <p><b>Net Gain</b>  Net Gain can refer to <i>biodiversity net gain</i>, <i>natural capital net gain</i> (also including ecosystem services like provision of clean air, water, natural beauty) or <i>environmental net gain</i> if delivering the full range of goals set out in the Government's 25 year environment plan. It can be delivered within the footprint of a development or at an alternative "offset" location By making it a requirement for all developments in Crawley to achieve net gain it significantly improves the protection to the natural environment and minimises the negative impacts of development. Net gain also serves as a tool to ensure continuous increases in GI throughout Crawley which increases the natural capital assets of Crawley making the District an even better place to live. Net gain can be quantified and measured using the DEFRA biodiversity metric 2.0 beta on which more information can be found at: <a href="http://publications.naturalengland.org.uk/publication/5850908674228224">http://publications.naturalengland.org.uk/publication/5850908674228224</a> Any feedback on the metric should be provided to <a href="https://consult.defra.gov.uk/natural-england/the-biodiversity-metric-2-0/">https://consult.defra.gov.uk/natural-england/the-biodiversity-metric-2-0/</a> by the end of 2019.</p> <p>The requirement to incorporate Net gain into your Local Plan is driven by the NPPF in paragraphs 8. 170. 174. &amp; 175. As well as the Government's 25 year environment plan especially in chapter 1 section 1.</p> <p><b>Ecological networks</b>  These are an interconnected network of species that have various complex interactions with each other.</p>	

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			<p>These networks can be considered at a variety of scales such as at a landscape scale where larger habitats and species meta-populations are important or at a specific site scale where individual environmental features of a site such as hedges and ponds are important.</p> <p>By understanding the existing ecological networks that are present throughout Crawley it will enable better protection and enhancement of biodiversity in the District and minimise the negative impacts can developments have on the natural environment.</p> <p>The requirement to incorporate ecological networks into your Local Plan is driven by the NPPF in paragraphs 170. &amp; 174.</p> <p><b>Soils</b></p> <p>The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.</p> <p>The plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 170.</p>	
REP211/946	Natural England	GI3	<p><b>GI3 Biodiversity Sites</b></p> <p>We support the requirements of this policy to conserve and enhance nationally designated sites, NPPF sites and locally designated sites, in line with the NPPF (paragraphs 8. 170. 174. &amp; 175.) and the Government's 25 year environment plan's aims (1.1.).</p> <p>We also support the requirement of planning applications to provide habitat and species surveys.</p> <p>However, we recommend a change in wording (detailed below) to strengthen this policy.</p>	

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			<i>"To ensure a net gain in biodiversity, the following areas will be conserved and enhanced <del>where possible and</del>, furthermore the council will support their designation and management."</i>	

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
REP62/167	Resident 3		<p>Further to the consultation on the local plan i have some comments/suggestions regarding green options.</p> <p>Having reviewed the 2035 plan given that this should be the net zero target year as opposed to 2050 i do not believe the plans go far enough or stipulate sufficient design requirements.</p> <p>The following are some ambitious suggestions that frankly will be necessary in the future, Crawley may as well be ahead of the game and start creating the employment in the below fields:</p> <ul style="list-style-type: none"> <li>- For all new residential dwellings and extended properties with off street parking the installation of EV charging points should be mandatory.</li> <li>- For all new or refurbished commercial/industrial sites at least 30% of staff and visitor parking points should be equipped with EV charging points.</li> <li>- For all road or utility works in locations with residential dwellings with no off street parking a grant from local government should be made available to cover the cost of EV charging point installation within all lamp posts in the area of works that are adjacent to car parking.</li> <li>- For all extensions to residential dwellings grants should be made available to provide significant support towards decarbonisation of the property and for this to be a planning requirement. Also to include the installation of new central heating systems such as air/ground source heat pump or electric boiler technology, the addition of enhanced insulation, and the addition of renewables such as solar and where practical domestic wind generation.</li> </ul>	<p>Net zero by 2050 is currently the national target, recommended by the Committee on Climate Change.</p> <p>Policy ST2 incorporates into CBC parking standards the EV charging point requirements in the 2019 West Sussex County Council guidance on parking in new developments.</p> <p>Planning can only apply these requirements where a development requires planning permission in the first place. It is harder for planning to deal with retrofitting.</p> <p>The Government is currently consulting on introducing mandatory requirements for installation of EV charging points, including for existing buildings.</p> <p>Road or utility works do not require planning permission but are licensed by the Highways Authority (West Sussex County Council).</p> <p>We recognise retrofitting of existing residential buildings will be part of achieving net zero carbon. However,</p>

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			<ul style="list-style-type: none"> <li>- For existing old housing stock grants should be made available to all owners of such properties to carry out sufficient works towards achieving net zero carbon. Where wet central heating systems exist encourage retention of such systems to prevent carbon waste from stripping out functional systems by providing a grant to support the integration of air or ground source heat pumps together with solar.</li> <li>- With regards to EV charging points explore partnering with utility providers in order to develop an EV charging scheme that becomes part of the normal home energy bill at the same rate per kWh as the home bill. This will enable those with no off street parking to benefit from the same charging price as those with home charging. Keeping in mind that currently EV's are a rich persons game your typical average to below average earner simply cannot afford an EV let alone to charge it from a public charging point.</li> </ul> <p>I note the consideration with regards to district heating schemes these often incorporate CHP engines that can be part of the CHPQA scheme or outside of the CHPQA scheme. Keep in mind the likely exposure the Climate Change Levy (CCL) in respect of the main rates as a relief recipient for natural gas or an electricity generator and dependent upon capacity if the combined generating capacity outside a CHPQA scheme exceeds 2MW there will be a probable liability register for CCL with HMRC and account for Carbon Price Support rates of CCL and if within a CHPQA scheme with a capacity of 2MW or more there will be a liability to register for CCL and account for Carbon Price Support rates of CCL. There is also an obligation to review any relief that may have been gained from CCL main rates annually and if operating a CHPQA scheme an annual review of scheme performance is mandatory. Such</p>	<p>the issue of grant funding is not within the scope of the local plan, and in the absence of this funding making this a planning requirement would risk placing a big cost burden on the householder.</p> <p>Yes, but grant funding required for this is not within the gift of the Local Plan.</p> <p>This is an interesting suggestion but does not fall within the scope of the local plan.</p> <p>This is useful information but relates to the implementation, financing and accounting of CHP schemes rather than the planning policy basis per se. It is not thought to have direct implications for the local plan. All these comments will be shared with the corporate Sustainability Team and those working on the CHP project.</p>



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			<p>operations should not be left to just engineers or energy managers this is a common mistake, finance managers for the council should also be involved to manage the tax aspects of such operations.</p> <p>Detail regarding Climate Change Levy and Carbon Price Support can be found on the gov.uk site notices of particular interest are CCL1/2; CCL1/3; CCL1/6.</p>	
REP131/368	Southern Water	Policy SDC1	<p>Strategic Policy SDC1 – Sustainable Design and Construction (p180)</p> <p>→ <i>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?</i></p> <p>Southern Water supports the council's aim to require minimum BREEAM ‘Excellent’ standards for water for non-domestic buildings.</p>	Support Noted.
REP131/369	Southern Water	Policy SDC3	<p>Strategic Policy SDC3 – Tackling Water Stress (p186)</p> <p>→ <i>Is the ‘optional’ building regulations standard for water efficiency in new dwellings still appropriate and justified in Crawley?</i></p> <p>Crawley is within an area of serious water stress, as identified by the Environment Agency. It is therefore appropriate to apply the optional building regulations standard of 110 l/p/d water efficiency for new development as a minimum standard. Southern Water is encouraging developers to meet or exceed this standard by waiving the new connection charge for water efficient development (<a href="https://www.southernwater.co.uk/infrastructure-charges">https://www.southernwater.co.uk/infrastructure-charges</a>)</p> <p>→ <i>Is it reasonable and appropriate to set a more advanced aspirational target of 100 or 80 litres/person/day?</i></p> <p>Southern Water supports this approach as it aligns with our own ‘Target 100’ water efficiency programme. Target 100 is our long-term plan to reduce daily water consumption to 100 litres per person by 2040, with a mid-term target of 120 litres by 2025 (from current consumption rates of around 129 litres). In turn, Southern</p>	Support Noted.

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			<p>Water plans to reduce the amount of water lost through leakage from our pipes by 15% by 2025 and by 40% by 2050.</p> <p>In addition, higher standards of water efficiency in new development will equate to greater long term sustainability – with the potential to delay or reduce the need to increase abstraction or find new sources of water supply, which in turn will help to minimise impacts on the environment and save customers' money.</p> <p>We would add that in conjunction with measures to improve water efficiency, the policy should also seek to protect existing water resources, by ensuring new development does not have an unacceptable impact on the quality and potential yield of ground and surface water sources.</p> <p>→ <i>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?</i></p> <p>Scientific research around climate change and its predicted impacts is continuously evolving, and in tandem with this is an ongoing requirement to increase water supplies to meet the needs of a growing population. It is therefore important to ensure that water efficiency policies can quickly adapt to any changes to the predicted future availability of water in the environment. Southern Water therefore supports the council's approach as it will enable this policy to automatically align with any future tightening of government standards on water efficiency.</p> <p>→ <i>Are the BREEAM requirements in respect of new non-residential buildings and extensions/ changes of use appropriate and justified?</i></p> <p>It is important that not only residential, but all new development should be required to meet higher standards of water efficiency. Without a comprehensive approach, it will be more difficult to achieve meaningful savings.</p>	<p>Policy SDC3 amended.</p>

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REP143/427	Indigo Planning on behalf of McKay Securities	Policy SDC2	<p><b>Strategic Policy SDC2</b></p> <p>Whilst we acknowledge that District Energy Networks provide efficiencies over centralised electricity production. However, decentralised energy technologies such as CHP plants are often fuelled by fossil fuels and so, although more efficient, are not necessarily renewable.</p> <p>It is very likely that a District Energy Network scheme which serves large employment sites such as those found in Royal Manor would be served by CHP and so in many cases a more localised and renewable energy measure for each individual site is likely to be more environmentally sustainable.</p> <p>Policy SDC2 should be amended to support cleaner and more renewable energy measures on a site-specific basis rather than forcing proposals to form part offsite District Energy Networks which may not be the most appropriate energy option for the proposed development.</p>	<p>The intention of the policy is to achieve maximum CO2 efficiencies overall. District Energy Networks as such have a demonstrated ability to achieve this through reduced primary energy consumption. Feasibility work has highlighted the potential for such networks within Manor Royal, so it is considered reasonable to promote them through planning policy in a proportionate way which takes account of the presence and potential for networks and the technical feasibility of connection.</p> <p>We do not accept dichotomy of 'non-renewable' network solutions on the one hand and 'renewable' on-site solutions on the other. On-site and networked solutions can both incorporate renewable forms of energy such as solar and biomass, or low carbon energy sources such as CHP and heat pumps.</p> <p>In any case, we resist the suggestion that the potential for a low carbon energy network solution should not be promoted as such because of the potential for on-site renewable generation. Unless a new development proposes to draw 100% of its energy demand from renewable</p>

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				<p>sources the question is not whether there will be resulting emissions, but what their scale will be. We consider that the policy as drafted would result in lower emissions overall than one which allowed for site-specific solutions as a first choice, without the need to explore the potential for a district energy strategy.</p> <p>Further, on-site renewable solutions (most likely in the form of solar PV, heat or solar thermal in the context of Manor Royal) are not necessarily in conflict with participation in a larger energy network, and indeed as long as there are residual emissions generated by a development there will be potential for the combination of different solutions.</p> <p>The policy is consistent with the 'be lean, be clean, be green' energy hierarchy, by which energy efficiency and efficiencies in the supply of energy (including energy networks) should take priority, with other low/zero carbon energy sources then being used as far as possible to mitigate residual emissions.</p>
REP153/485	Home Builders Federation		<p><b>Sustainable design and construction</b> The HBF acknowledges that the Government has not enacted its proposed amendments to the Planning &amp; Energy Act 2008 to</p>	As far as there is a logic to the government's approach it seems to be that the removal of councils' ability to

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			<p>prevent the Council from stipulating energy performance standards that exceed the Building Regulations but consider that the Council should comply with the spirit of the Government's intention of setting standards for energy efficiency through the Building Regulations and to maintain this for the time being at the level of Part L 2013 (as set out in Fixing the Foundations, HM Treasury, July 2015). Under the 2019 NPPF new development should be planned to help reduce greenhouse gas emissions by its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards (para 150b). The Government has sought to set standards for energy efficiency through the Building Regulations. The starting point for the reduction of energy consumption should be an energy hierarchy of energy reduction, energy efficiency, renewable energy, and then finally low carbon energy. From the start, emphasis should be on a "fabric first" approach which by improving fabric specification increases thermal efficiency and so reduces heating and electricity usage consequentially newly built homes are far more energy efficient than the existing housing stock. We support the movement towards greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements which is universally understood and technically implementable. It is the HBF's opinion that the Council should not be setting different targets or policies outside of Building Regulations. The key to success is standardisation and avoidance of every LPA in the country specifying its own approach to energy efficiency which would mitigate against economies of scale for both product manufacturers, suppliers, and developers.</p>	<p>set energy performance standards in excess of Building Regulations was/is linked to the introduction of more stringent Building Regulations requirements than those in Part L 2013. The current consultation on the 'Future Homes Standard' is consistent with this, with removal of planning policy powers being linked to introduction of a higher national mandatory standard.</p> <p>We believe our policies are consistent with national policy and with the government's general approach.</p> <p>'Be lean, be clean, be green'. The 'be clean' part can involve low carbon energy resources so we do not accept that 'low carbon' is always lower priority than 'renewable'.</p> <p>'Fabric first' should not mean not 'fabric only'.</p> <p>The Code Level 4 equivalent has been nationally recognised for years. We do not accept that this is a case of 'every LPA in the country specifying its own approach'. This standard is used in emerging Local Plans in Worthing and Chichester and adopted plans in Reigate &amp; Banstead and Brighton &amp; Hove. PPG March 2019</p>

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				change confirms councils can use this standard.
REP154/495	Manor Royal BID		<b>Environmental sustainability:</b> The Local Plan mentions ambitions to make Crawley future ready for decentralised energy, district energy systems and district heat networks. More work is required, and is being progressed, on the feasibility of district heat networks for Manor Royal, but the Manor Royal BID is supportive of ensuring the business district can take advantage of wider changes towards decentralised energy. Improving the current Local Plan policies to provide more clarity concerning support for the provision of other on-site renewable technologies in line with the BISEPs ReEnergise Manor Royal project, delivered in partnership with Your Energy Sussex (West Sussex County Council), should be provided.	Noted. The policies are intended to support these projects, and we acknowledge 'ReEnergise Manor Royal' in the Reasoned Justification supporting policy SDC2.
REP186/768	CPRE Sussex	Policy SDC1	<b>Policy SDC1: Sustainable Design and Construction</b> <b>Consultation Questions:</b> <b>Is this Policy consistent with national policy requirements for addressing the challenge of climate change in Local Plans?</b> We support the inclusion of this policy and believe that the introduction of a mandatory requirement for CO2 emission reductions in new dwellings in excess of Building Regulations requirements is justified and appropriate. We believe that this should be achieved before setting a proportion of energy in new dwellings to be provided by renewable/ low carbon sources as an addition to the requirement for CO2 emissions reductions. We believe that the minimum energy and water requirements for BREEAM 'Excellent' represent an appropriate standard for new non-domestic buildings.	Support Noted. Policy SDC2 introduces requirements regarding low/zero carbon energy use which, as currently set out, overlap with, rather than being additional to, the CO2 reduction targets in SDC1. The difficulty with making them additional is that this may be judged to constitute a new standard in excess of the government's policy for 'national technical standards.'
REP188/788	Turley on behalf of Rainier Developments	Policy SDC1	<b>Policy SDC1: Sustainable Design and Construction</b> 2.41 The NPPF (Section 14) recognises that planning and local plans should take a proactive approach to mitigating and adapting to climate change and it is welcomed to see that the New Local Plan for Crawley Borough has sought to tackle this through the	We think that the requirements are additional to those in the Building Regulations, rather than an unnecessary duplication of them.

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			<p>inclusion of an entire section on 'Sustainable Design and Construction'. However, Rainier are concerned that the intentions of Policy SDC1 are unnecessary and a duplication of building regulations. Instead it is considered that this policy should be refocussed and seek to achieve carbon reductions and sustainable design in a more flexible way without adding onerous requirements to new development.</p> <p>2.42 The recently adopted Harborough Local Plan (2011 – 2031) adopted in April 2019, included a policy 'Mitigating Climate Change' which sought to achieve similar outcomes as Policy SDC1, but in a much more flexible way. We have included the wording of that Policy below:</p> <p><i>1. Major development will be permitted where it demonstrates:</i></p> <p><i>(a) how carbon emissions would be minimised through passive design measures;</i></p> <p><i>(b) the extent to which it meets relevant best practice accreditation schemes to promote the improvement in environmental and energy efficiency performance;</i></p> <p><i>(c) how the development would provide and utilise renewable energy technology;</i></p> <p><i>(d) whether the building(s) would require cooling, and if so how this would be delivered without increasing carbon emissions;</i></p> <p><i>(e) how existing buildings to be retained as part of the development are to be made more energy efficient;</i></p> <p><i>(f) how demolition of existing buildings is justified in terms of optimisation of resources in comparison to their retention and re-use; and</i></p> <p><i>(g) how carbon emissions during construction will be minimised.</i></p> <p><i>2. In Strategic Development Areas applicants should demonstrate whether a decentralised energy network is viable and, if so, the arrangements for its delivery and future management</i></p>	<p>We intend the policy requirements to be clear, to go beyond Building Regulations, and to be capable of being costed so as to ensure that the policy does not compromise the viability of the plan. The policy remains flexible in so far as a developer can choose how to achieve the relevant standard (subject to the separate requirements of SDC2). The concern with a policy setting no standard, and reliant on subjective wording, is the risk that environmental benefits additional to those arising from the Building Regulations would be harder to define, cost, achieve, or monitor.</p>

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			2.43 Rainier would consider the wording of Policy SDC1 should be revised to take a similarly flexible approach to mitigating climate change as was taken in the recently adopted Harborough District Local Plan.	
REP196/812	Environment Agency	Policies SDC1 & SDC2	<p><b>GROUNDWATER HYDROLOGY – WATER RESOURCES</b> <b><i>Draft Local Plan</i></b></p> <p>Para 14.5 "The South East, including Crawley, is an area of extreme water stress" - we classify it as an area of "serious" water stress, but we support the case for "more stringent water efficiency measures" as elaborated in para 14.8, 14.23 and Policy SDC3. The reference of footnotes 65 and 70 is still current.</p> <p>Para 14.12, Policy SDC1, reiterated in SDC3 and para 14.41 - We support the requirement for new non-domestic buildings to reach the BREEAM Excellent standard for water efficiency, except where it is demonstrated that this is not technically feasible.</p> <p>Below para 14.26 , Policy SDC1 Questions</p> <ul style="list-style-type: none"> <li>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? - <b>Yes the water requirement is an appropriate standard.</b></li> </ul> <p>Below para 14.37, Policy SDC3, and para 14.39 - We support the water efficiency targets mentioned. The preferable target of 100 litres/person/day is consistent with long-term ambitions in Southern Water's revised draft 2019 Water Resources Management Plan (yet to be finalised).</p> <p>Paras 14.39-14.41 - We hope the proposed new Water Cycle Study will support the conclusions here taken from the previous one.</p>	<p>Support Noted.</p> <p>Support Noted.</p> <p>Noted.</p> <p>Support Noted.</p>



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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>Below para 14.43, Policy SDC3 Questions</p> <ul style="list-style-type: none"> <li>• Is the 'optional' building regulations standard for water efficiency in new dwellings still appropriate and justified in Crawley? - <b>Yes it is.</b></li> <li>• Is it reasonable and appropriate to set a more advanced aspirational target of 100 or 80 litres/person/day? - <b>Yes the 100 target is a long-term ambition set out in Southern Water's latest revised draft Water Resources Management Plan. 80 is achievable, it is more costly but more practical in new developments.</b></li> <li>• 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? - <b>This does seem reasonable in the light of what is currently appearing in Water Company plans, and the greater national steer anticipated for the next round of plans in 2024.</b></li> <li>• Are the BREEAM requirements in respect of new non-residential buildings and extensions/ changes of use appropriate and justified? - <b>Yes, other local authorities have incorporated similar requirements, at least in respect of new developments.</b></li> </ul>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
REP211/947	Natural England	SDC1	<p><b>SDC1 Sustainable Design and Construction</b></p> <p>We strongly support the requirements of this policy for all developments to respond to climate change in line with section 14 of the NPPF and a key concept of the Government's 25 year environment plan.</p>	
REP211948	Natural England	SDC3	<p><b>SDC3 Tackling Water Stress</b></p> <p>We strongly support this policy's requirements to meet the tighter water efficiency requirements.</p> <p>However, we strongly recommend a change in wording (detailed below).</p>	

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>“...Building Regulations optional requirement for tighter water efficiency, and should, <del>where feasible</del>, achieve a the more advanced target of 100 litres/person/day.”</p> <p>See Annex A for further advice on tackling water stress</p> <p><b>Soils</b></p> <p>The Local Plan should give appropriate weight to the roles performed by the area’s soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.</p> <p>The plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 170.</p> <p><b>Water Stress</b></p> <p>Your Authority contains areas of Serious Water Stress as designated by the Environment Agency. For developments in Southern Water Services drinking water supply area Natural England recommends water efficiency polices should be developed to support Southern Water's “Target 100”. This target, of 100 litres per person per day by 2040 is needed by Southern Water to avoid the need for water supply options that are likely to damage biodiversity or/and effect protected landscapes. For development in other companies’ supply area Natural England support the Environment Agency recommendation of a maximum of 110 litres per person per day. Water efficiency measures will help reduce the current impact of water resources on the natural environment and thereby contribute to more resilient landscapes and seas in line with Natural England’s conservation 21 and the Governments’ aspirations for thriving plants and wildlife.</p>	

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			<p>Reducing the water we use will contribute to the Government's 25 Year Environment Plan aspirations for clean and plentiful water and to restore sustainable abstraction in rivers.</p> <p><b>Sustainable Drainage Schemes (SuDS)</b> Larger developments should be supported and encouraged to replace antiquated surface drainage systems such as gully pots with SuDS, in accordance with best practice. These SuDS have significantly reduced impacts on surrounding water quality and contribute to Green Infrastructure and natural capital.</p>	

<b>ENVIRONMENTAL SUSTAINABILITY: ENVIRONMENTAL PROTECTION</b>				
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REP22/060	Thames Water	Policy EP1	<p>The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".</p> <p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p> <p>Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.</p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which</p>	<p>Noted. Draft Policy EP1 has been prepared to reflect national policy requirements as set out in the NPPF and Planning Practice Guidance: Flood Risk and Coastal Change.</p> <p>Noted. Water and/or Sewerage infrastructure is identified by PPG: Flood Risk and Coastal Change (Table 2) as Essential Infrastructure which has to be located in a flood risk area for operational reasons. The draft policy reflects this guidance.</p> <p>Noted. The policy has been worded so as to refer to floor risk from all sources, including fluvial, pluvial (surface water) and sewer flooding. There is specific acknowledgement in relation to flooding from surface water and sewer overload at paragraph 15.12 of the supporting text.</p>

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			<p>surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.</p> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan: <b><i>“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”</i></b></p>	<p>Noted. Part iii of draft Policy EC1 requires development to reduce peak surface water run-off rates and annual volumes of run-off through the effective implementation, use and maintenance of SuDs (subject to technical feasibility or viability)</p> <p>Noted. This is consistent with the recommendations of the Water Cycle Study, and wording has been added to Policy EC1 to reflect this comment.</p>
REP155/519	West Sussex County Council	Para. 15.18	<p><b>Lead Local Flood Authority</b></p> <p>With regard to flooding there are no additional comments on the proposed allocated sites. Support is given to paragraph 15.18.</p>	Noted and support welcomed.
REP174/621	Gatwick Airport Limited	Policy EP4	<p><b>Chapter 15 Environmental Protection Policy EP4 Noise and Development Consultation Question - Does the policy correctly define the threshold at which the Significant Observed Adverse Effect Level (SOAEL) and Unacceptable Adverse Effect Level (UAEL) occur?</b></p> <p>We support in principle the Council’s intention to control noise sensitive development which could be affected by transport noise sources. GAL suggest that it is made clearer in the draft Local Plan Noise Annex that CBC adopts the same definitions for the terms NOAEL, LOAEL, SOAEL as set out in the</p>	<p>Noted, and GALs general support for the policy approach is welcomed. To address particular issues raised in GAL’s response:</p> <p>Additional text has been added to the Noise Annex to refer to <i>Planning Practice Guidance: Noise</i>. The Planning Practice Guidance does itself refer to the NPSE, and it is considered appropriate that the Noise Annex refers to the relevant PPG.</p>

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			<p>explanatory Note to the Noise Policy Statement for England (NPSE).</p> <p>GAL also suggest that the threshold levels align with recent government policy for LOAEL and significant community annoyance specifically for aircraft noise (Consultation Response on UK Aviation Policy: A frameworks for balanced decisions on the design and use of airspace, October 2017, Section 2).</p> <p>Policy EP4, para 3, relating to Noise Sensitive Development states:  <i>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.</i></p> <p>The Noise Policy Statement for England (NPSE), at paragraph 2.24, suggests that reasonable steps to mitigate noise impacts should be considered above LOAEL, not above SOAEL. GAL therefore suggest that the policy reference to:  'significant noise (SOAEL)' should be replaced with the policy text: <i>'adverse noise effect (above LOAEL)'</i>.</p> <p>Paragraph 2.1.5 of the proposed Crawley Local Plan Noise Annex notes that the Planning Policy Guidance: Noise allows Local Planning Authorities to produce local plan specific noise standards. This would take account of local conditions such as housing type, density, demand etc. However, in the case of aircraft noise, government has in the last few years provided specific guidance for the UK based on research at UK airports including Gatwick. Government guidance is clear that LOAEL</p>	<p>It is recognised that national guidance sets out that appropriate mitigation is required at the LOAEL. Policy EP4 has been amended to reflect this, with corresponding amendments made to the Local Plan Noise Annex.</p> <p>Policy EP4 amended to refer also to the need to mitigate at the LOAEL.</p> <p>The World Health Organisation (2018) <i>Environmental Noise Guidelines for the European Region</i> published subsequent to the SONA 2014 study and the UK Aviation Policy, issued strong recommendations that aircraft noise should be reduced to levels below 45 dB Lden, and 40 dB Lnight for night noise exposure, as aircraft noise above this</p>

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			<p>for aircraft noise is Leq 16 hour day 51dB and Leq 8 hour summer night 45dB (Consultation Response on UK Aviation Policy: A frameworks for balanced decisions on the design and use of airspace, October 2017, Section 2 paragraph 2.72). It is GAL's opinion that these values should be reflected in the Noise Appendix Table 1.</p> <p>Table 1 states CBC's proposed LOAELs, SOAELs, Unacceptable Adverse Effects Levels for new housing. The NSPE requires levels above LOAEL to be mitigated and minimised as follows:</p> <p><i>The second aim of the Noise Policy Statement for England</i></p> <ul style="list-style-type: none"> <li>• <i>Mitigate and minimise adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development.</i></li> </ul> <p><i>2.24 The second aim of the NPSE refers to the situation where the impact lies somewhere between LOAEL and SOAEL. It requires that all reasonable steps should be taken to mitigate and minimise adverse effects on health and quality of life while also taking into account the guiding principles of sustainable development (paragraph 1.8). This does not mean that such adverse effects cannot occur.</i></p> <p>New housing in areas above LOAEL (Leq 16-hour day 51dB and Leq 8 hour night 45dB) should therefore only be permitted if adequate mitigation is included in the design. Professional Planning Guidance: Planning &amp; Noise – New Residential Development (May 2017) is referred to in government guidance (PPG- Noise Paragraph: 015 Reference ID: 30-015-20190722 Revision date: 22 07 2019, <a href="https://www.gov.uk/guidance/noise--2">https://www.gov.uk/guidance/noise--2</a> ) and it would therefore be appropriate to reflect the levels and guidance in it in Table</p>	<p>level is associated with adverse health effects. Therefore it is not proposed to amend Noise Annex Table 1 in this regard.</p> <p>Noted. L<sub>AFmax</sub> in Table 1 amended on this basis.</p>

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			<p>1, including Lmax levels which are relevant for aircraft noise. ProPG: Planning and Noise states (Figure 1 Note d and Appx A para A.19) that noise impacts on a residential site with Lmax levels above 60dB at least 10 times a night should not be considered as negligible. The ProPG also recommends (para 2.31; Figure 2 Note 4; Appx A paras A.20, A.21) that and mitigation is required where internal levels would otherwise exceed Lmax 45dB at least 10 times a night. GAL sees no reason to depart from these in the case of planning new housing around Gatwick airport and the surrounding area.</p> <p>GAL considers that Paragraph 4.1.7 of the Noise Annex is consistent with this second point, on internal Lmax levels, and is supported.</p> <p>Since 2014 noise policy has been interpreted by various the local planning authorities, a public inquiry inspector, the Mayor of London and the Secretary of State for Transport, in the following applications for new airport infrastructure:</p> <ul style="list-style-type: none"> <li>▪ Birmingham International Airport Runway Extension, 2014;</li> <li>▪ London City Airport Development Plan, 2015-2016; and</li> <li>▪ Cranford Agreement Secretary of State's Decision, February 2017.</li> </ul> <p>In the Cranford case the inspector noted <i>'the parties do not differ about the SOAEL for aircraft noise: it is 63dB LAeq, 16 hours (or its equivalent if other metrics are considered). Noise impacts at that level require to be avoided.'</i></p> <p>The CBC draft Policy EP4 states, under the heading 'A. Noise Sensitive Development':</p> <p><i>'For aviation transport sources the unacceptable Adverse Effect is considered to occur where noise exposure is above 60dB LAeq 16hr.'</i></p>	Support Noted



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			<p>We note this statement is under the heading 'Noise Sensitive Development', and whilst we would support planning policies to ensure that new housing is not permitted above this level of aircraft noise, we do not agree that such levels are unacceptable in a broader sense. There are currently approximately 550 households within the Leq 16 hr 60dB contour, and we continue to seek measures to minimise noise levels and we offer noise insulation at levels in this area.</p> <p><b>Consultation Question - How best can the Local Plan ensure that an acceptable noise climate is achieved?</b></p> <p>GAL considers that, in line with best planning practice, the draft Plan should continue to promote policies which seek to locate new noise sensitive development in locations removed from existing noise generating sources, such as the airport. New major noise generating developments should not be permitted unless the need and benefits of the development outweigh any adverse environmental impacts.</p> <p>We also consider that draft Policy EP4 gives appropriate effect to the 'significant adverse impacts' test of NPPF Para 180 (a). ("Planning policies and decision should avoid noise giving rise to significant adverse impacts on health and quality of life."). The NPPF sets out that planning policies and decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment. It also sets out that existing businesses should not have unreasonable restrictions placed on them as a result of development permitted after they were established. [Paras 180, 182].</p> <p>GAL is strongly committed to ensuring that noise impacts from the airport are minimised so far as possible. We continue to</p>	<p>Support for the 60dB LAeq 16hr level for SOAEL noted.</p> <p>Noted and support welcomed. The policy continues to support an approach to support noise sources and receptors, and ensure that through good acoustic design, and having regard to the agent of change principle, development is appropriate to its location.</p>

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			<p>develop our approach to minimising our noise emissions through a wide range of activities. However, key to securing this objective in the future is ensuring that local planning policy protects the occupiers of planned noise sensitive development against excessive noise and prevents planning permission being granted for such developments in inappropriate locations. Policy EP4 as drafted does broadly promote the achievement of these objectives.</p> <p>We therefore generally support the position the draft Plan adopts in relation to noise when considering an application or an allocation of a site for a noise sensitive development, subject to the comments below regarding the need for mitigation.</p> <p>Paragraph 15.30 refers to <i>ProPG: Planning &amp; Noise – New Residential Development (May 2017)</i> without stating its status or if its use is supported. This guidance gives numerical guidance levels for use in designing new housing to meet appropriate noise levels inside and in outside space through a good acoustic design process. The July 2019 update of Planning Practice Guidance: Noise (Paragraph: 015 Reference ID: 30-015-20190722) refers to it as a document which may be of assistance, albeit that the numerical values in it should not be regarded as fixed thresholds or outcomes which have to be achieved in every circumstance. It would be appropriate to indicate that its use is supported by national PPG in the draft Plan.</p> <p><b>Additional Comments</b> GAL notes that para 4.1.6 of the Noise Annex Identifies that Figure 1 ‘Gatwick Noise Contour 2 Runway Scenario published by CAA in 2003’ is to be updated. GAL suggests that the noise</p>	<p>Noted. Text has been added to Policy EP4 to make clear that the in preparing Noise Impacts Assessments, <i>ProPG: Planning &amp; Noise – New Residential Development</i> will be adhered to.</p>

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			<p>contours used in the draft Plan should now reflect those in the Gatwick Master Plan 2019 Plan 31 (Air Noise Map 2040).</p> <p>We also note that the Technical Appendix, which provides supporting evidence in relation to noise from transport matters, needs to be updated. We consider that it is imperative that the Technical Appendix is updated for the next stage of the Local Plan Review process i.e. Regulation 19 Consultation in order to clearly identify the evidence base used to support Policy EP4 and the Noise Annex.</p> <p>GAL have not seen an updated version of the Planning Noise Advice Document: Sussex (2015) and would like the opportunity to comment on this document when it becomes available.</p> <p>In addition, para 5.3 of the Technical Appendix, when updated, needs to clarify that the Gatwick Home Relocation Scheme is only applicable in relation to the development of an additional southern runway being built.</p> <p><b>Consultation Question - More stringent criteria are proposed to reduce the number of people exposed to unacceptable noise from aircraft. What are your thoughts on this approach?</b></p> <p>GAL supports the inclusion of a policy in the plan that specifically considers noise generating and noise sensitive development. We also support the inclusion of a technical 'Noise Annex' that explains how the policy will be applied in relation to sound levels from transport and industrial and commercial sources. However, the specific values relating to aircraft noise are not consistent with the evidence from research.</p>	<p>Noted. The Local Plan Noise Annex has been updated to outline that the noise contours identified at Plan 31 of the Gatwick Airport Master Plan 2019, as set out at Figure 1 of the Local Plan Noise Annex, will be used for the determination of planning applications, unless confirmed otherwise by an adopted Area Action Plan.</p> <p>The Technical Appendix has been updated.</p> <p>Noted. Additional wording has been added to the Noise Annex to clarify. With regards to specific values, this point is addressed above.</p> <p>Support Noted</p>

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Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>GAL supports in the draft Plan the policy proposal and principle to avoid new housing in areas of excessive aircraft noise, and to ensure that if new housing must be permitted within the airport's LOAEL zones it should only be permitted if appropriate mitigation is included within the design, as indicated in the <i>ProPG: Planning &amp; Noise – New Residential Development (May 2017)</i>.</p> <p>GAL is strongly committed to ensuring the noise levels in communities surrounding the airport are minimised. Key to securing this objective is also ensuring that local planning policy protects noise sensitive development against excessive noise and prevents planning permission being granted for such developments in inappropriate locations. Policy EP4 as drafted does broadly promote the achievement of these objectives.</p>	Noted and support welcomed.
REP177/668	The Woodland Trust	Policy EP1	<p><b>Environmental Protection</b></p> <p>Policy EP1 – We welcome the inclusion of Sustainable Urban Drainage Systems (SUDS) for all developments in para iii). Woods and trees should form an integral part of all SUDS.</p>	Noted and support welcomed.
REP177/669	The Woodland Trust	Policy EP3	<p>Policy EP3 –Damage from increasing concentrations of ammonia in the air and levels of nitrogen deposition is one of the greatest threats to ancient woodlands in the UK. We recommend that any proposals for new or extended ammonia-emitting developments (such as intensive livestock units) should be subject to special assessment, as set out in the Woodland Trust guidance note <i>Assessing air pollution impacts on ancient woodland – ammonia (2019)</i>.</p>	Noted. As there is a relatively low proportion of land in Crawley in agricultural use, the likelihood of receiving applications for ammonia-emitting developments such as intensive livestock units is relatively low. However, Policy EP5 (as amended) would apply and appropriately plan for such development where planning permission is required. For any proposal where it cannot be demonstrated that air quality has been appropriately factored into the location, design and operation of development, and where

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				necessary, appropriate mitigation provided, planning permission will not be permitted.
REP186/769	CPRE Sussex		<p><b>Environmental Protection Chapter Consultation Questions:</b></p> <p><b>Do you know of any areas of Crawley particularly affected by certain types of pollution?</b></p> <p><b>Are there any types of pollution which you would like to see better controlled? How do you think this could be achieved?</b></p> <p><b>More stringent criteria are proposed to reduce the number of people exposed to unacceptable noise from aircraft. What are your thoughts on this approach?</b></p> <p>Research by CPRE shows that levels of light pollution in Crawley borough are amongst the highest in Sussex (<a href="https://www.nightblight.cpre.org.uk/">https://www.nightblight.cpre.org.uk/</a> ) We believe that a stand alone policy is needed to tackle this problem, in addition to the specific references in CD8 and LC5. This would be consistent with the NPPF para 180.</p> <p>We support more stringent criteria to reduce the number of people exposed to unacceptable noise from aircraft. Noise Management policies have historically focussed on areas with high noise levels. However, research shows that the Lden level at which 25% of respondents were highly annoyed has decreased significantly over the past 50 years. In other words, nuisance has increased. In the UK a comparison of studies shows that the percentage of people who are highly annoyed is also increasing. In 1982 9% of people indicated that they were highly annoyed at 57dB – the same percentage was found in 2014 at 54dB. ( See for example 'Aircraft Noise and Annoyance: Recent Findings: London: Civil Aviation Authority, 2018. CAP 1588.)</p>	<p>Noted. Crawley is a predominantly urban area, with an international airport and a number of main employment locations within the borough. This makes it necessary to ensure that urban areas of the borough are appropriately lit. However light pollution does represent an important consideration in urban areas that must be taken into account as part of the planning process. It is recognised that Crawley also benefits from a comprehensive green infrastructure network as well as countryside situated outside the built up area boundary. Light pollution in these locations has the potential to undermine the intrinsic character and beauty of these locations. Therefore the Local Plan has been amended to include a specific External Lighting policy (EP6) to ensure that the risk of light pollution is appropriately considered through the planning process.</p> <p>Noted and support welcomed.</p>

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REP193/802	Pegasus Group on behalf of Persimmon Homes Plc.	Policy EP4	<p><b>2. Development and noise</b></p> <p>1.7 Strategic Policy EP4: Development and Noise ensures states that People's quality of life will be protected from unacceptable noise impacts by managing the relationship between noise sensitive development and noise sources.</p> <p>1.8 The policy indicates that 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. It identifies that <b><i>“for aviation transport sources the Unacceptable Adverse Effect is considered to occur where noise exposure is above 60dB LAeq,16hr.”</i></b></p> <p>1.9 Noise annex figure 1: the proposed wide spaced runway contours from Gatwick Airport's 2019 master plan indicates a Gatwick airport noise contour 2 runway scenario. It identifies that Forge Wood area is subject to <b>54- 60dB</b> noise exposure therefore is broadly compliant with the Policy EP4 and hence does not preclude development occurring in the above locations. Some areas beyond the current consented scheme could however be affected more by noise and this will influence what land uses they are best suited to.</p> <p>1.10 The proposed masterplan provides an indication of the development locations. It does not specify the proposed use types however, the sites put forward in these representations are expected to comprise a mix of uses. The overarching objective is to maximize the potential of the land available and suitable for the development in accordance to the local policy guidance. This approach reflects paragraph 117 of the National Planning Policy Framework, which states that: <b><i>“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while</i></b></p>	<p>Noted. Policy EP4 identifies the Unacceptable Adverse Effect as occurring where noise exposure is above 60dB LAeq, 16hr. Where residential or noise sensitive use is proposed within the LOAEL or SOAEL, the policy sets out how development should be carefully planned to ensure that noise impact for future users is acceptable.</p> <p>The principle of employment uses, where these are not noise sensitive, beyond the 60dB contour may be acceptable. Any planning application that is submitted will be assessed and determined on the basis of Policy EP4 and the Local Plan Noise Annex, having regard to the nature of development proposed as a receptor or source of noise.</p>

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			<p><b><i>safeguarding and improving the environment and ensuring safe and healthy living conditions.”</i></b></p> <p>1.11 The four land parcels to the north of Forge Wood are more likely to be affected by existing and potential future noise arising from Gatwick Airport. My client would be keen to work with the LPA to see whether some of the land at the margins of the noise contour could be suitable for residential development with appropriate noise mitigation. In the locations where noise levels exceed the levels that the LPA consider to be appropriate for housing, Persimmon are open to bringing that land forward for employment or other less noise sensitive uses.</p> <p>1.12 The land to the south of Forge Wood Phase 2D may however be suitable for additional housing. Whilst road noise from Crawley Avenue will be a consideration it has been possible to mitigate such matters on the adjoining land.</p>	
REP196/810	Environment Agency	Policies EP1 & EP2	<p><b>Environmental Protection - Section 15</b></p> <p>It is noted that this section of the draft Local Plan states the nature of the flood risk within Crawley Borough and that any development is planned with flood risk in mind. Within the Borough of Crawley, there are areas which are at risk to fluvial flooding as the Council area is crossed by a number of designated main river watercourses. In addition, the Borough is shown to be at risk to flooding from surface water, with some areas being considered at a significant risk to surface water flooding. Future development will place further pressure on the flood risk management infrastructure already in place, with provision needing to be made as part of any additional development for the successful management of flood risk. Climate change, and the predicted alterations to weather patterns this will bring, will place additional pressure on</p>	Noted. These elements are captured within the policy, though additional wording has been added to the Reasoned Justification to make clearer the different potential sources of flood risk in Crawley.

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			<p>ensuring developments can be considered as safe for its lifetime.</p> <p>It is recognised that the Borough has a number of restrictions and constraints to future development. Flooding, and the need to provide space for water, should be recognised as a possible constraints on how future development can be brought forward.</p> <p><b>Policy EP1/EP2</b> – The supporting text setting out the reasoned justification for this Policy recognises the risk to flooding from a number of sources in the Borough, and the need to manage and control the risk to flooding as part of any proposed development. Point 15.16 is especially welcomed, and we note the comments made within point 15.18 in relation to our previous input to the three sites partially affected by flooding.</p> <p>With reference to the questions posed on Policy EP1, the explanation of when a Flood Risk Assessment or a Flood Resilience Statement are required would benefit from further explanation as currently this is not made clear within the EP1 text. It is appreciated that further information on a flood Resilience Statement is given in EP2, the Council may wish to consider making a reference within both EP1 and EP2 to where the Flood Risk Assessment and Flood Resilience Statement details can be found.</p> <p>Consideration should also be made to referencing climate change specifically within the Policies to ensure that this is factored in to any development at the start of the process.</p> <p>A separate Policy, as suggested by EP2, for small scale householder extensions does seem justified. The nature and scale of many of these types of proposal can be problematic to consider as part of a Flood Risk Assessment, so a more</p>	<p>Noted. This is captured at Paragraph 15.16 which recognises that within Flood Zone 3, all undeveloped areas or areas of open space are defined by the Local Plan as Flood Zone 3b (functional floodplain).</p> <p>Noted and support welcomed.</p> <p>Noted. The circumstances in which a Flood Risk Assessment is required are set out in the Planning Practice Guidance: <i>Flood Risk and Coastal Change</i>, and reiterated at Policy EP1 (part iii). However, additional wording has been added to both Policies EP1 and EP2 to more clearly explain the circumstances in which a Flood Risk Assessment or a Flood Risk and Resilience Statement will be required.</p> <p>Noted. Additional text has been added</p> <p>Noted and support welcomed.</p>



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			bespoke Policy to ensure that the flood risk associated with these types of development can be adequately consider is welcomed.	
REP198/841	The Ifield Society		<ul style="list-style-type: none"> <li>• <b>Do you know of any areas of Crawley particularly affected by certain types of pollution?</b> Ifield and Langley Green</li> <li>• <b>Are there any types of pollution which you would like to see better controlled? How do you think this could be achieved?</b> Air and Noise pollution needs to be controlled. This can be achieved by ensuring that Gatwick Airport Ltd. does not build a new runway, and ensuring Homes England et al do not build within the ancient Parish of Ifield.</li> <li>• <b>More stringent criteria are proposed to reduce the number of people exposed to unacceptable noise from aircraft. What are your thoughts on this approach?</b> Very much agree. Any attempt by Gatwick Airport Ltd. to 'steamroller through' a new runway need to be vigorously opposed, not just on the grounds of Air and Noise Pollution (*Appendix 6 provided with original representation to support*)</li> </ul>	<p>Noted.</p> <p>Noted. The Local Plan contains a number of policies that specifically seek to ensure that issues of pollution are considered and where appropriate mitigated, as part of the planning process.</p> <p>Noted and support for draft noise policy is welcomed.</p>
REP107/849	Town Access Group		<ul style="list-style-type: none"> <li>• <b>Do you know of any areas of Crawley particularly affected by certain types of pollution?</b> Near most primary schools from exhaust fumes at drop-off/pick-up times. Worst affected are the children.</li> <li>• <b>Are there any types of pollution which you would like to see better controlled? How do you think this could be achieved?</b> Prohibit drop-off near schools. Build a Western Relief Road to reduce traffic pollution in an urban area (Bewbush, Gossops Green, Ifield, Langley Green).</li> </ul>	<p>Noted.</p> <p>Noted. This would be beyond the remit of the planning system for existing schools. If new school development comes forward then the policy wording of EP5 could be used to adequately address this matter. Outside of the planning system, air quality action planning is taking steps to address pollution near schools including anti-idling campaign and current Defra grant bid (not yet secured) to deliver</p>

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				<p>school street closures as trial events, with the view to getting community support to make them permanent in the future.</p> <p>The Local Plan, through Policy ST4, provides the policy mechanism to Plan for a Western Relief Road.</p>

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REP84/200	Metrobus		<p>Thank you for inviting us to comment on the Local Plan Review.</p> <p>We are generally supportive of the plans by the council for the development of Crawley in the coming years. The plan is creative about the challenges of providing substantial amounts of additional housing with minimal space to build it in the borough. In relation to transport, we welcome the recognition shown in the plan that the provision of public transport links should be a key consideration in future development with new sites along good transport links being prioritised.</p> <p>Bus travel is the most sustainable form of public transport and this is rapidly improving with a high proportion of Crawley's bus fleet being ultra low emission Euro 6 vehicles, which emit up to 98% less NOx emissions than the vehicles they replaced. 24 of these buses have been introduced over the past 3 years. Next year we intend to introduce 20 zero emission electric fuel cell buses to the Fastway network at a cost of around £10 million and will be the first commercial UK bus operator to do this, making a first for Crawley.</p> <p>Bus services in Crawley are among the best in the UK on so many measures. Bus usage is well above average and continues to rise strongly, despite falls elsewhere across the country, and far more than doubling over the past 18 years. This has been delivered through an excellent partnership between Metrobus and both borough and county councils, with the innovative Fastway scheme acting as a catalyst for this in the previous decade, delivered at a Benefit Cost Ratio of 4.67. Bus use where Fastway operates is among the highest in the country,</p>	Support noted. Relates particularly to SD1, SD2, CD4(a), CD4(b), ST1.

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			<p>helping us to be able to deliver some four 24 hour bus routes across Crawley, without any taxpayer support.</p> <p>Other areas of Crawley are still generally well served by bus but don't have anywhere near the same levels of usage because buses get stuck in the same traffic as cars, providing less of an incentive to travel sustainably. This lower demand then makes it unviable to operate the same level of frequency as we see on the core Fastway routes where local people know it is quicker (as well as easier, more sustainable and more productive) to use Fastway to get to town, the leisure park, Manor Royal and Gatwick than it would to drive.</p> <p>If new developments encourage more car movements, this will put more of a strain on the existing road network with increased congestion and pollution. Non-Fastway buses get delayed by this, making them less attractive and less efficient, which in turn increases fares due to the higher cost of operation.</p> <p>The key to continue to help us to take more cars off the road and replace them with sustainable bus movements is to replicate the very successful Fastway-style bus priority measures such as bus only link roads, bus lanes and guideways elsewhere in Crawley and a key feature of new developments. If new residents know that the bus is the quickest way to work, shops or education then they will use it. If it takes longer than the car, they are less likely to do so. Kilnwood Vale will be providing (albeit very late) two bus only links as the most direct routes to Crawley, forcing cars to take a much longer route. In contrast, Forge Wood has no bus priority whatsoever.</p>	<p>Relates to ST1 and H3g, potentially also ST4.</p>

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			<p>Cheap car parking and generous provision in new developments discourages bus use. At present there is an over supply of parking in the town centre, resulting in very low prices. New developments will use some of this parking land but there should be a policy of preventing this short term use and parking should be priced to encourage sustainable transport.</p> <p>The design of new developments is also very important. It is essential that roads to be served by bus enable a direct route through ideally dedicated roads. All too often, buses have to work their way around slow windy roads with parking on highway and speed humps, making bus travel very slow, inefficient and unattractive. Bus stops should be sited where they have good well lit pedestrian links from nearby houses or businesses. They should have shelter and live times information with key stops being 'superhubs' (a concept being delivered by the Crawley Growth Fund in Manor Royal and Crawley town centre) where a much more attractive enclosed waiting facility is provided with facilities such as WiFi, USB charging, CCTV, greenery and entertainment.</p> <p>Encouraging new residents to try the bus when they move in is important. At Kilnwood Vale we have been working with the developers to offer free taster bus travel for the first few months after moving in. It is also important that buses are available for the first residents in a development as otherwise they will need a car initially and are then much less likely to give it up when the bus service arrives later.</p> <p>The Crawley Growth Fund is doing a great job at helping to improve town centre and Manor Royal infrastructure that</p>	<p>Parking standards (ST2) will allow levels of parking to be reduced in highly accessible areas where travel plan measures and local parking controls are in place. Pricing of existing car park spaces is not within scope of planning control.</p> <p>Policy ST1 responds to this issue.</p> <p>Amendment made to ST1 to require sustainable transport infrastructure to be in place from first occupation.</p>

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			<p>includes bus priority but a significant improvement that is desirable but unfunded is a substantial improvement to Crawley bus station. The current bus station is perfectly located at the entrance to County Mall shopping centre and adjacent to the railway station but was designed in the late 1980s when bus service levels were less than half of current provision and designed for far fewer users. Crawley residents and visitors to the town need a much better central bus hub than the current provision of a couple of rows of bus shelters. The Growth Fund has created a plan to make this better but it is currently unfunded. The plan should make this a key priority, using new CIL funding to help finance it. CIL could also be used to fund some of the other infrastructure measures cited above and additional live times screens and shelter at existing stops, features which are key to encouraging bus use.</p> <p>We would like to see the proposals above considered for the final version of the plan.</p> <p>We look forward to playing a key role in supporting the further growth of Crawley and working with the council to ensure that this is achieved sustainably.</p>	<p>Noted.</p> <p>The allocation of CIL funds is a separate process to the Local Plan. Other sources of funding are being explored for the Bus Station project.</p> <p>Ongoing joint working welcomed.</p>
REP145/430	Network Rail		<p>Thank you for consulting Network Rail on the Crawley Local Plan review.</p> <p>We note that the plan says that Network Rail is already committed to improving all four rail stations in the Borough (Crawley, Three Bridges, Gatwick and Ifield) over the plan period, with major improvements already underway at Three Bridges Station.</p> <p>Just to clarify; works haven't begun at Three Bridges, however we are aware of the proposed improvements. We</p>	<p>Text amended.</p>

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			<p>don't have any plans for Ifield Station at this stage. This statement is correct in terms of Crawley and Gatwick improvements.</p> <p>Other than this, we don't have any comments on the plan at this stage.</p>	
REP147/433	Surrey County Council		<p><b>Highways</b> Our highways comments concern the A23 and B2036, two of the main roads running through Crawley into Surrey. The plan includes about 1400 dwellings within the Pound Hill North and Forge Wood ward located west of the B2036. Such development at Pound Hill North and Forge Wood would have an impact on the B2036 which crosses into Surrey at Horley up to the junction with the A23 at the Chequers junction north of Horley. The enhanced employment opportunities at Manor Royal would also lead to additional traffic on the A23, with impacts at the Chequers junction north of Horley.</p> <p>Any development proposals would have to include an assessment of vehicle movements on the B2036 and A23 into Reigate and Banstead. Furthermore, wider Transport Assessment should take place before committing to strategic sites. The process should include the cumulative assessment of committed developments in southern Reigate and Banstead, Mole Valley and Tandridge along with any known implications of the Gatwick expansion proposals.</p>	<p>The Transport strategy and modelling is to be updated and will assess the cumulative impacts of planned developments beyond Crawley. Liaison with SCC will form part of this work.</p> <p>The Forge Wood development is already permitted and under construction with over 1000 properties already occupied.</p>
REP153/486	Home Builders Federation	Policy ST2	<p><b>Car parking standards – electric vehicles</b> If the use of electric and hybrid vehicles is to be encouraged, the HBF support a national standardised approach which should be implemented through the Building Regulations. Any Option for the inclusion of a</p>	<p>It is the stated intention of the government to do this through Building Regulations and a consultation was conducted between July and October 2019. The proposed requirements are</p>

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			<p>policy requirement for electric vehicle charging should be clearly written and unambiguous (2019 NPPF para 16) specifying the quantum and type of provision sought either AC Level 1 (a slow or trickle plug connected to a standard outlet) or AC Level 2 (delivering more power to charge the vehicle faster in only a few hours) Electric Vehicle Charging Point (EVCP) or other alternatives. The requirement should be supported by evidence demonstrating technical feasibility and financial viability. There may be practical difficulties associated with provision to apartment developments or housing developments with communal shared parking rather than houses with individual on plot parking. Any requirement should be fully justified by the Council including confirmation of engagement with the main energy suppliers to determine network capacity to accommodate any adverse impacts if all or a proportion of dwellings have EVCPs. If re-charging demand became excessive there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables and new sub-station infrastructure may be necessary.</p> <p>We would also recommend that the parking standards are set out in the local plan rather than being set out in supplementary guidance. Given that an application could be refused on the basis of these standards they must be considered policy and published within the local plan. As such they then cannot be amended without the necessary scrutiny afforded amendments to local plan policy.</p>	<p>for the most part more stringent than those proposed in the Local Plan, and as such would supersede them. Since timing of these changes has yet to be clarified it is considered reasonable to retain these requirements as an interim measure.</p> <p>The policy will be subject to viability testing.</p> <p>Provision of EV charging points is intended to facilitate the growth of electric vehicles, and to provide flexibility and convenience as to when and where they can be charged. Actual demand on the network will largely depend on levels of EV ownership. However, where charging points are available at locations where vehicles can safely be left for long periods, particularly outside of peak times, such as in private developments, this is likely to mitigate strains on the network.</p> <p>Standards are set out in the Parking Standards Annex to the Local Plan.</p>
REP154/496	Manor Royal BID		<p><b>Sustainable transport:</b> The Manor Royal BID is supportive of policies to support more sustainable travel, active travel and electric vehicle infrastructure. This needs</p>	<p>Noted.</p> <p>It is considered the proposed strategy set out in the Regulation 19 draft Local</p>



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			to be balanced with the demand for car use while encouraging a modal shift. Recognition of the contribution of strong public realm and the investment in the look, feel and appearance of places generally for encouraging active travel should be emphasised and ambitions for encouraging electric vehicle use should not be confined to new private development but a more strategic approach taking in the provision of such infrastructure in public areas, including the public highway, should be considered.	Plan Review document is consistent with these objectives (i.e. see Policies ST1, ST2). The provision of Electric Charging points on the public highway is not directly within the scope of the Plan but there is a strategy being progressed by West Sussex County Council to include provision in public areas.
REP154/497	Manor Royal BID	Policy ST4	<b>Western Relief Road:</b> Supportive of consideration of this for the benefit it will have moving people and goods more easily to and from the west of the town into and around Manor Royal. However, details of how this will impact on Manor Royal need to be better understood as the area of search appears to impact on the northern boundary of the business district and those properties and businesses located there. Consideration also ought to be given to how the relief road would benefit businesses operating in the County Oak area to relieve the pressure on the junction of County Oak Way and London Road (A23).	Noted.  Area of search has been amended and does not extend east of the A23 at County Oak.
REP155/511	West Sussex County Council	Para. 16.1	<b>WSSC Highways – Sustainable Transport Paragraph 16.1</b> “The retention of existing essential transport infrastructure”; it is suggested that the word ‘essential’ is removed from this statement.	Agreed. Amendment made.
REP155/512	West Sussex County Council	Policy ST1	<b>WSSC Highways – Strategic Policy ST1: Development and Requirements for Sustainable Transport -</b> Amendments to the policy are suggested as follows: 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, <i>where appropriate, bus priority</i>	

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			<p><b>measures, enhanced passenger information and / or</b> routes identified in the council's Local Cycling and Walking Infrastructure Plan;</p> <p>a) Transport Statement, which assesses the impact of a development with relatively small transport implications and <b>a Travel Plan Statement</b>, which identifies how the development will maximise the usage of sustainable modes of transport as opposed to the private motor vehicle; or a</p> <p>b) Transport Assessment, which assesses the impact of a development when there are significant transport implications, <b>and a Mobility Strategy (for large developments) or Travel Plan</b>, which identifies how the development will optimise the usage of sustainable modes of transport as opposed to the private motor vehicle. <b>The Mobility strategy or Travel Plan will identify appropriate improvements to sustainable modes, or the introduction of new infrastructure that are required to adequately mitigate development impacts and detail how these will be delivered and operated.</b></p>	<p>Policy amended to this effect.</p> <p>Amendments made.</p>
REP155/513	West Sussex County Council	Policy ST2	<p><b>WSSC Highways Strategic Policy ST2: Car and Cycle Parking Standards</b></p> <p>It is suggested that the final paragraph is amended to read: 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 <b>and its emerging EV Strategy.</b></p>	Para 16.15 amended to include this reference.
REP155/514	West Sussex County Council	Para. 16.14	<p><b>WSSC Highways Paragraph 16.14 - Rail Stations:</b></p>	Noted. Policy H3g Urban Extensions encourages sustainable transport and

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			It is suggested that some form of supporting text reference the potential development of new stations that may be located near the boundary (Kilnwood Vale) of CBC but may have a major role to play in sustainable travel of existing residents and potential new developments. The text may indicate how the council will support neighbouring authorities in delivering appropriately located new rail stations.	the delivery of infrastructure to support development beyond the borough boundary.
REP155/515	West Sussex County Council	Policy ST4	<p><b>WSSC Highways</b>  <b>Strategic Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Relief Road</b></p> <p>It is requested that the final paragraph is amended to read: The design and route of the Western Relief Road must take account of its impact on residential properties close to the route, <b><i>provision of suitable bus priority measures (including future proofing for forecast traffic growth and congestion), future proofing for technological developments in transport provision</i></b>, the flood plain, the rural landscape, local biodiversity, heritage and heritage landscape assets and visual intrusion.</p>	Noted. Policy amended to better reflect this advice.
REP155/516	West Sussex County Council		<p><b>WSSC Highways</b>  <b>Highways – Public Rights of Way (PROW)</b></p> <p>PROWs are mentioned but not significantly. It is suggested that they are recognised as a valuable access resource separately and additionally to the road highway network. PROWs minimises local vehicle journeys, thereby reducing road congestion and enhancing air quality; they are a means for activity for health and wellbeing; they support local community integration/ interaction, so combatting isolation and loneliness; and give good reason to establish wildlife corridors, so aiding the local</p>	Noted. Policy OS3 is a specific policy for Rights of Way and Access to the Countryside. Policy ST1 (Development and Requirements for Sustainable Transport) also emphasises the importance of developments' linkages to the importance of the walking and cycling network and provides a basis for securing contributions to support routes identified on the Local Cycling and Walking Infrastructure Plan.

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			<p>environment. Given all those positive benefits, PROWs will be a valuable means to meet the ambitions set out in the Local Plan Vision and add to residents' quality of life as part of new housing developments, and so it is suggested should be recognised further in the plan.</p> <p>Ensuring the availability of the PROW network and enhancing it will deliver a number of the Plan's policy ambitions:</p> <ul style="list-style-type: none"> <li>i. SD1 – Sustainable Development and a target of being carbon neutral;</li> <li>ii. SD2 – Enabling Healthy Lifestyles and Wellbeing;</li> <li>iii. CD4(a) – Effective Use of Land;</li> <li>iv. OS2 – Provision of Open Space and Recreational Facilities;</li> <li>v. IN2 – Location and Provision of New Infrastructure;</li> <li>vi. EC12 – Rural Economy (in that businesses support local cyclists and horse riders with goods and services, also walkers through tea rooms, etc.);</li> <li>vii. H3c – Open Spaces within new housing developments;</li> <li>viii. GI1 – Green Infrastructure;</li> <li>ix. ST1 – Development and Requirements for Sustainable Transport (it is welcomed to prioritise need of non-motorised users over private motorised users).</li> </ul>	
REP162/562	Sussex Ornithological Society	Policy ST4	<p><b>Policy ST4 (Safeguarding of a search corridor for Crawley Western Relief Road).</b></p> <p>25. We are concerned about this policy, which has very little explanation of the level of need, the potential impacts, or explanation of alternative options. The safeguarded area on the map is clearly incomplete since it neither reaches</p>	The Local Plan can only identify land within the boundaries of the Planning Authority. The link to the A264 is within Horsham District. The area concerned is an area of search rather

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			the A264 nor the A23 which are the two roads that it is supposed to link. Moreover, it appears to cover areas of known biodiversity value including a local wildlife site and ancient woodland. Much more detailed information must be provided to justify the inclusion of this policy.	than a precise location.  All requirements of environmental constraints continue to apply.
REP172/603	Vail Williams on behalf of Jersey Farm landowners	Policy ST4	<p><b>Sustainable Transport</b></p> <p>Strategic Policy ST4 “Safeguard of a Search Corridor for a Crawley Western Relief Road” is also relevant for our clients. The identification of the indicative search corridor for the relief road on the diagrams on page 205 and on the Proposal Map, indicate that there is an area that will be safeguarded against development.</p> <p>Whilst the undulating shape of the search corridor safeguards development that will be incompatible with the future delivery of a full western relief road, it is unclear where the boundaries to the site have come from and indeed the degree of land take that would be required in order to deliver the western relief road.</p> <p>The safeguarding land impacts on the land that already has planning consent under the 2015 application, and the emerging application currently in front of CBC for a revised development for B2/B8. For ease we have added the western relief road to our block plan, to show how significant the current boundary would be on bringing forward the proposed development.</p> <p>Given the extent and boundary currently shown, the nine landowners surrounding Jersey Farm would urgently seek further clarity as to why the boundary is stated as such. This is disputed that such a land take would be needed. However, there is also concern over the principle of safeguarding for the land for a western relief road, given</p>	The approach has been amended to reflect the proposed North Crawley Area Action Plan.

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			<p>that it is not evident how such a development may, or could come forward in the local plan time frame, and we believe this is premature and not currently achievable or deliverable. To assist we have also identified the western relief road currently proposed and how it would affect 8 of the 9 sites proposed under the 23.6ha call for sites and the impact on the submitted planning application.</p> <p>Whilst we understand the alternative access requirements stem from significant new developments, particularly those at Kilnwood Vale and at North Horsham, there is concern that this land-take is too significant and the principle has not been yet agreed, therefore we would seek to ensure that this policy is removed at this time.</p>	
REP174/633	Gatwick Airport Limited	Policy ST1	<p><b>Chapter 16 Sustainable Transport</b>  <b>Policy ST1: Development and Requirements for Sustainable Transport</b>  <b>Consultation Question. Is this policy consistent with national planning policy requirements relating to the promotion of sustainable transport?</b>            GAL considers that the Policy ST1 is reasonable and consistent with the approach to supporting sustainable travel. However, GAL considers that the policy does not explore the potential for technology to improve travel planning, including the development of car share or ride share alternatives, demand responsive transport or active measures to reduce the need to travel.</p> <p><b>Consultation Question. Are there requirements or terms within the policy which should be explained more fully, either in the policy or elsewhere?</b>            The policy appears to focus solely on the impact of private cars in respect of congestion, safety and some implied</p>	<p>Support noted. The Plan requires developments to demonstrate how they will mitigate transport impacts (para 16.12), prioritising the reduction of overall travel demand and minimising car use but does not dictate how this should be achieved.</p> <p>In a context where planning cannot control what sort of vehicles people use, we consider that it is reasonable for a policy on Sustainable Transport to be focused to this extent on</p>

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			<p>impacts on community accessibility and quality of life. There is no explicit link in the sustainable transport policies to measures targeted at reducing the environmental effects of transport, including measures to promote the use of low or zero emission vehicles, either privately or by commercial operations.</p> <p><b>Consultation Question. Are the requirements of the policy justified and appropriate?</b> The requirements of the Policy ST1 appear justified but should explicitly acknowledge, as reported in the draft Plan text (para 16.17) that the current road network does not currently cater for all demand, and that certain improvements should be made in relation to mitigating the impacts of recently permitted development within Crawley and surrounding boroughs. This is important so that S106 and CIL requests are not disproportionate to the new development coming forward by seeking to resolve an existing shortfall, which may make development proposals unviable with a consequent loss in future value to the local economy.</p> <p><b>Consultation Question. Are there additional ways in which the policy can reasonably support sustainable transport?</b> GALs seeks further policy support for the use of electric vehicles, including the provision of infrastructure and prioritised access (e.g. preferential parking) could be promoted within the policy.</p>	<p>alternatives to the private vehicle, which remains the least environmentally sustainable mode of surface transport.</p> <p>CIL is tariff-based (hence proportionate to the development) and subject to viability testing, subject to there being an unmet 'infrastructure gap'. The current CIL charge was adopted on the basis of an infrastructure gap far in excess of likely CIL income. It is anticipated that this will remain the situation. S106 may still be sought on a site-specific basis but the Reg 122 'tests' for S106 agreements and NPPF policy on highways impacts, taken together, are considered to provide an appropriate basis for proportionate and directly related highways mitigation to be sought, where required.</p> <p>Policy ST2 includes requirements in respect of provision of EV charging points. The Government has also consulted on new requirements which would in many instances supersede the proposed Policy.</p>
REP174/634	Gatwick Airport Limited	Policy ST3	<p><b>Policy ST3: Improving Rail Stations</b> <b>Consultation Question. Is this policy justified and necessary?</b> Yes, the policy is justified and necessary. Gatwick has the</p>	Support noted.

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			<p>busiest airport rail station in the UK. We are continuing to work with Network Rail to strive for the rail stations improvements and 2019 saw real successes with major upgrades to the station to be delivered. GAL is working with the Network Rail and Department for Transport to deliver the long term vision for the airport linked to the South Terminal airport. Such a scheme will contribute greatly to improving the accessibility and quality of airport access across the region.</p> <p>Gatwick supports the Policy ST3 for sustainable transport and acknowledges the importance of Gatwick Airport station, for access to the airport by staff and passengers, as well as serving the local community. We note that the principle that any improvements or developments at or within the vicinity of railway stations will be expected to enhance the sustainable access to individual stations should also apply to sites in adjacent areas outside the borough that impact or rely on access to stations within Crawley.</p> <p><b>Consultation Question - Are there elements of the policy requirements which could be further clarified, either in the policy or elsewhere?</b></p> <p>The extent to which the function of Gatwick Airport railway station should be broadened as an interchange for surface travellers (i.e. non-airport related travel) requires careful consideration, not least in respect of the station capacity implications and also the operational and security responsibilities relating to a facility integrated with the airport terminal. The capacity of the station will be enhanced through the Gatwick Station Project, which is predicated on it serving the airport and supporting a higher</p>	<p>Policy H3g relates to requirements for urban extensions to Crawley.</p> <p>Noted, however, the council considers the proposed approach reflects the fact that this is an important station for the wider town.</p>



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			<p>rail mode share as Gatwick grows (in accordance with our commitments to sustainability) but acknowledging some non-airport related rail journeys consistent with current travel patterns. Gatwick will object to local policy making or any local development that comes forward that could impose additional crowding or operational constraints on the airport and the station, without appropriate accompanying mitigation, including but not limited to further expansion of the station and its access routes (subject to Gatwick's approval and land access).</p> <p><b>Consultation Question. Does the policy accurately describe the roles which each station can and should play within the borough and the wider transport network?</b></p> <p>The area for which Gatwick Airport station may be considered a "local" station or interchange includes Manor Royal and some areas north of the borough, beyond which stations at Three Bridges, Horley and Crawley are closer and this should be reflected clearly. Other than the strengthening of public transport links via the Fastway bus network and provision of improved active travel connections, any promotion of Gatwick Airport station for non-airport surface travellers must avoid increasing the number of car trips accessing the station and must not risk affecting the safe and secure operation of the station or the airport as a result of additional journeys or crowding This needs to be explicit in the policy wording and supporting text.</p>	<p>Comments noted. It is felt that the wording as in the Regulation 19 Draft strikes the balance appropriately in terms of the airport-related function of the station and reasonable scope for wider functions.</p>
REP174/635	Gatwick Airport Limited	Policy ST4	<p><b>Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Relief Road</b></p> <p><b>Consultation Question – Do you agree a Search</b></p>	<p>The link road is not intended to function as a fast bypass, rather a transport corridor serving new</p>

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			<p><b>Corridor for a Crawley Western Relief Road should be identified in the draft Plan or not?</b></p> <p>It is unclear what function and status the Search Corridor will take and therefore, other than identifying that highway infrastructure may need to be brought forward to support development in a defined area, its inclusion in the draft Plan may serve to discourage rather than enable development. The draft Plan already makes clear that any development coming forward to the west and north west of Crawley would be expected to address the need for the Crawley Western Relief Road (Policy H3g (iv) and in para 12.77) and, if included, the corridor should therefore reflect the opportunity and need for development in this area. Note also that Gatwick remains concerned that the completion of the Crawley Western Relief Road between the A264 and A23 at County Oak may serve to increase traffic flow on the A23 past the airport and at North Terminal Roundabout and South Terminal Roundabout in order to connect to the M23. Such re-routing of traffic has the potential to impact on the operations of Gatwick Airport and its accessibility for staff and passengers. Of particular interest is the capacity of the northbound A23 adjacent to Gatwick's South Terminal (currently one bus only lane and one lane for general traffic) and the capacity at North Terminal Roundabout, which suffers peak period congestion and already caters for significant traffic volumes between Horley and Crawley. Gatwick Airport will be undertaking its own traffic modelling with respect to its Master Plan proposals and will require assurances that the delivery of the Crawley Western Relief Road will not have negative impacts on the operation and accessibility of the</p>	<p>development west of Crawley and the growth of the airport. Traffic modelling will include assessment of the possible road.</p>

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			<p>airport.</p> <p><b>Consultation Question - Do you consider that the Search Corridor covers the appropriate area, or where do you suggest it is located?</b></p> <p>It is the opinion of GAL that as shown in the draft Plan the Search Corridor does not cover an appropriate area in that it clearly encroaches on safeguarded land identified for Gatwick expansion (to the south). The safeguarding of land is in place by way of national policy and therefore this should take precedence over all new highway infrastructure provision in the same area. The search corridor should therefore be re-drawn and focused only in the area immediately south of the safeguarded land area. No evidence or explanation has been given in the draft Plan as to why the search corridor extends east of the junction with the A23 at County Oak, and this is inconsistent with the plan text (para 16.18 and 16.19), which describes the need only to link the A264 and the A23. It is unclear as to how this further section of the Search Corridor would provide value for future development given the Manor Royal area in which it sits is already largely developed with associated infrastructure in place.</p> <p><b>Proposed Amendments to Policy ST4:</b> GAL considers the wording of Policy ST4 should be amended as follows: The text below sets out how new text to be inserted in <i>italics</i>. “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</p>	<p>The Search Corridor has been amended and does not extend east of the A23. Local Plan Policy SD3 (North Crawley Area Action Plan) is also relevant to this issue.</p> <p>The Local Plan no longer safeguards land south of the airport, see Policy SD3: North Crawley Area Action Plan.</p>

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			biodiversity, heritage and heritage landscape assets and visual intrusion <i>as well as the planning restrictions relevant to the safeguarding of land for Gatwick Airport expansion (to the south), which should take precedence.</i>	
REP174/636	Gatwick Airport Limited		<p><b>Sustainable Transport Chapter 16 Consultation Questions:</b></p> <p><b>Consultation Question. What aspects of the transport system in and around Crawley work well?</b> Crawley's Fastway bus network operates exceptionally well and has benefitted from a proactive approach by Metrobus to expand the network. Gatwick has continued to provide funding for services through its Sustainable Transport Fund, which has wider benefits to the community by supporting 24 hour services and enhancing evening, early morning and weekend travel. Crawley also benefits from a network of well-served railway stations, in particular Gatwick Airport and Three Bridges stations on the Brighton Main Line, which offer a wide range of frequent connections across the region. This creates significant economic benefit and encourages businesses to locate in the area, as well as promoting sustainable travel for Crawley residents.</p> <p><b>Consultation Question. What aspects of the transport system in and around Crawley work less well? How could these be improved?</b> There are areas of considerable congestion on main roads in and around Crawley where growth in development activity has not necessarily been matched by proportional transport capacity enhancement. This is in part because the main highway network does not adequately serve the separate needs of local traffic accessing the town and</p>	<p>Recognition of Crawley's excellent Fastway bus service, and mainline railway stations noted.</p> <p>ST1 relates to requirements from new developments. Further scope for investment and improvement is addressed in the council's emerging Transport Strategy.</p>



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			<p>through traffic. While policies are in place to reduce the number of road journeys by private car and promote sustainable travel there are areas where there is insufficient priority given for buses or active travel. Increased investment and prioritisation of sustainable modes, including enhancing access to railway stations would be recommended.</p> <p><b>Consultation Question 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)?</b> Certain corridors could support a more extensive network of bus priorities and sustainable transport routes, with additional segregated links for active travel. This would require a more interventionist approach to traffic calming in residential areas, and focusing car traffic more to routes that are capable of capacity enhancement or are already suitable for higher flows of traffic. The main routes to and from the M23, and the A264 should be capable of supporting growth without encouraging the use of cars over more sustainable modes. This means including or allowing passive provision for bus priorities and cycle lanes.</p> <p><b>Consultation Question. In what key ways would you like transport in Crawley to be different in 2035?</b> Policies that go further to reduce the impact of private cars and give far greater priority to active travel and public transport, along with infrastructure support for electric vehicles (including car share and ride share options) is required in order to promote Crawley as an exemplar town for sustainable transport.</p> <p><b>Consultation Question. Do you think a Western Relief</b></p>	<p>Noted. Policy ST1 alongside emerging LCWIP/Transport Strategy respond to this.</p> <p>Travel Plan/Mobility Strategy requirements set by ST1 are considered to give the appropriate level of support to these options in the context of the Local Plan.</p>

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			<p><b>Road from the A264 at Kilnwood Vale to the A23 at County Oak would be a benefit to the town?</b></p> <p>A Western Relief Road would provide improved access to Manor Royal and take some pressure off certain routes to the west of the Town Centre, as well as reduce some rat-running on unsuitable routes. However, without careful planning for sustainable modes, it may serve to increase the amount of road traffic and as currently envisaged it does not adequately provide for through traffic travel to or from the M23 corridor. Using the new relief road from the Horsham along the A264 to access the motorway network would only change the route of traffic west of the town centre and, once on the A23 at County Oak, vehicles would either join the already congested A2011 Crawley Avenue towards M23 Junction 10 or add to A23 traffic accessing Gatwick Airport passing through both main terminal roundabouts to access the M23 at Junction 9. Analysis undertaken by Gatwick Airport for the Airports Commission indicated that the Western Relief Road was not essential to support expansion. However, Gatwick would be pleased to share its further analysis to be undertaken in association with its Master Plan to identify the benefits and impacts of a new link.</p>	<p>The Policy as currently drafted seeks to ensure scope to plan for sustainable modes. It is not intended as a fast bypass route, nor to access the motorway network.</p>
REP176/646	Savills on behalf of Bellway Homes Limited	Policy ST2	<p><i>Strategic Policy ST2: Car and Cycle Parking Standards</i></p> <p>We note that the Council is proposing to retain its own car parking standards (which are currently contained within the Parking Standards Annex to the Urban Design SPD – October 2016). This is despite West Sussex Country Council (as the highway authority for the area) having adopted different car parking standards. This often leads to conflicting advice on development proposals and</p>	<p>The WSCC standards for C3 development have been incorporated into these CBC standards, as set out in the Parking Standards Annex included in the plan.</p>

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			uncertainty for applicants. It is considered that Crawley Council should align its car parking standards with West Sussex.	
REP177/670	The Woodland Trust	Policy ST4	<p><b>Sustainable Transport</b> Policy ST4 – We are concerned that the search area for the proposed relief road includes ancient woodland at Rowley Wood ASNW (grid reference: TQ2791939226). We welcome the confirmation that new highways crossing the Ifield Brook Meadows and Rusper Road Playing Fields Local Greenspace would be wholly unacceptable, given the impact this would have on ancient woodland (section 16.20). Where new transport infrastructure is proposed, we encourage policies that explore its potential for delivery of major tree planting and woodland creation, the construction of wildlife bridges and green corridors and the restoration of damaged ancient woodland.</p>	It should be noted at this stage that the area is an area of search rather than a precise route. The policy sets out a framework for considering biodiversity issues.
REP184/732	Sussex Wildlife Trust	Policy ST4	<p>Strategic Policy ST4: Safeguarding of a search corridor for Crawley Western Relief Road. SWT is very concerned about the inclusion of this policy with very little explanation of the level of need, potential impacts or understanding of alternative options. The safeguarded area is not clear on the map, but it appears to cover areas of known biodiversity value including a local wildlife site and ancient woodland. Further, more detailed information must be provided to justify the inclusion of this policy.</p>	It should be noted at this stage that the area is an area of search rather than a precise route. The policy sets out a framework for considering biodiversity issues.
REP185/743	Carter Jonas on behalf of Homes England	Policy ST3	<p><b>Policy ST3: Improving Rail Stations</b> In light of the identified potential for the possible westwards expansion of Crawley, Homes England considers that the role of Ifield Station is under-valued. Homes England suggests d) should be amended to read “at Ifield Station,</p>	

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			<p><i>strengthen its role as a suburban station meeting the needs of current and future residents in the west of the town;</i>”. The fourth bullet point at paragraph 16.15 should be amended to acknowledge the potential westwards expansion of Crawley to read “<i>at Ifield rail station, the development of the Kilnwood Vale neighbourhood (in Horsham district) to the west of the town and the possible westwards expansion of Ifield (also in Horsham District) 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.</i>”</p> <p>Paragraph 16.16 identifies Crawley and Three Bridges rail stations as priority areas for infrastructure provision to ensure that opportunities are exploited for the use of sustainable transport. Ifield Station should be added to paragraph 16.16.</p> <p>This is consistent with Homes England’s observations on the draft Infrastructure Plan.</p>	<p>Policy and supporting text amended.</p> <p>Noted. See our comment in respect of those observations on the draft Infrastructure Plan in the relevant section below.</p>
REP185/744	Carter Jonas on behalf of Homes England	Policy ST4	<p><b>Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Relief Road</b></p> <p>The CBCLPR makes various references to the possible westward expansion of Crawley into Horsham. This spatial development strategy is supported by Homes England. In support of this, Policy ST4 identifies a Search Corridor for a Crawley Western Relief Road (CWRR) linking the A264 with the A23 and confirms that the Search Corridor will be safeguarded from development which would be incompatible with the future delivery of a full CWRR. Homes England supports this.</p> <p>However, Homes England does not consider that it is necessary for the safeguarding corridor to cross Rowley</p>	<p>Support Noted: Policy ST4, including the extent of the Search corridor and supporting text has been amended. Policy SD3 (North Crawley Area Action Plan) is also relevant.</p>



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			<p>Farm between the A23 London Road and Gatwick Road. The reason for this is straightforward. If the emergency runway to the north is utilised, the A23 London Road is dual carriageway and is an appropriate specification to connect into the CWRR. Constructing a short link across Rowley Farm would therefore not be necessary in this scenario.</p> <p>However, if Gatwick Airport does expand into the safeguarded land, the illustrative masterplan proposals show the existing A23 having to be re-aligned. An extract from the masterplan is shown below – with the view looking south – and this shows the re alignment of the A23 connecting to Lowfield Roundabout. Therefore, in this scenario, GAL would be responsible for the realignment of the A23 London Road.</p>  <p>Therefore, Homes England proposes that the eastern section of the proposed indicative search corridor for a CWRR be removed. The extent of this is edged in red on the extract from the Proposals Map:</p> 	

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			<p>Paragraphs 16.18-16.23 provide some history and context to the proposed CWRR. This is helpful. However, Homes England considers the reasoned justification dealing with the safeguarded land for the expansion of Gatwick Airport needs to be amended because the delivery of CWRR is essential to not just the development strategy of Crawley, but also on a more strategic level to address cumulative impacts of both the expansion of Gatwick and future development in the region. Whilst it is suggested that CWRR will be delivered in the short to medium term, there is no timescale for the further expansion of the airport into the safeguarded land, thus, Homes England proposes the following changes to paragraph 16.23:</p> <p><i><del>"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. In light of the uncertainty over the principle and timing of any further southern expansion of Gatwick Airport, the Council will work with Gatwick Airport to agree the specification and alignment of the Western Relief Road to allow its early delivery and ensure compatibility with the future expansion of Gatwick. The objective is to minimise the impact of the Western Relief Road on residents living close to the route</del></i></p>	

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			<p><i>and also on businesses operating along it. If necessary, the Council will work with other statutory bodies and agencies to deliver the Western Relief Road, possibly using compulsory purchase powers, however its objective is to minimise the need for land, property and businesses to be compulsorily purchased.”</i></p> <p><i>Gatwick Airport’s approach to safeguarding has resulted in sterilising a number of properties / land across the wider area. The approach that the Council proposes to take is measured and identifies the minimum extent of land likely to be necessary to deliver this part of the CWRR. Homes England supports this.</i></p>	
REP186/770	CPRE Sussex	Policy ST4	<p><b>Sustainable Transport Chapter Consultation Questions:</b></p> <p><b>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?</b></p> <p>We are concerned that the safeguarded area appears to cover a local wildlife site and ancient woodland.</p>	It should be noted at this stage that the area is an area of search rather than a precise route. The policy sets out a framework for considering biodiversity issues.
REP188/789	Turley on behalf of Rainier Developments	Policy ST2	<p><b>Policy ST2: Car and Cycle Parking Standards</b></p> <p>2.44 It is welcomed that Policy ST2 allows decision makers to recognise the accessibility / sustainability of sites which are located in highly sustainable locations and accordingly relaxes the need to provide policy compliant car parking provision. Such locations where this is appropriate are those which are centrally located, in highly accessible locations such as the proposed development site. By having a flexible approach to the application of car and cycle parking provision, the Council will be able to encourage the use of active and sustainable modes of transport in place of the private car and assist in the</p>	Support for ST2 noted. The policy has been amended but the scope for lower provision in accessible locations where appropriate measures are in place will remain.



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			<p><i>would you suggest it be located?</i></p> <p>To provide an understanding as to its possible location a Search Corridor should be identified within the Draft Local Plan.</p> <p>In relation to the area covered by the Search Corridor, the area to the west between the A23 and the River Mole offers a link whilst bypassing Crawley to the south. The area to the east of the A23 however runs through an employment area and connects with Gatwick Road, which already experiences high traffic volumes during the peak hours. Providing another link to allow a significant amount of additional traffic to join Gatwick Road in this location would not seem to be an optimum solution. Instead this route should extend only to the A23 as this is a more strategic route and is likely to prevent increased congestion on Gatwick Road to the east. Further detailed consideration is required on this matter.</p>	The Search Corridor has been amended.
REP198/842	The Ifield Society		<ul style="list-style-type: none"> <li>• <b>What aspects of the transport system in and around Crawley work well?</b> The bus system is excellent – especially No.200 and No.2</li> <li>• <b>What aspects of the transport system in and around Crawley work less well? How could these be improved?</b> The Bus system, especially, works less well in the evenings and night-time. The frequency could be improved at those times.</li> <li>• <b>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)?</b> The design and layout of Crawley makes it a 'challenge' to</li> </ul>	<p>Noted</p> <p>Fastway services run through the night although other services do not. The emerging Transport Strategy will consider these issues.</p> <p>Density means there is demand to support bus routes and network of off-road routes is good, but it is harder to</p>

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			<p>improve the different transport modes.</p> <ul style="list-style-type: none"> <li><b>In what key ways would you like transport in Crawley to be different in 2035?</b> Less reliance on cars (more emissions). Better use of Public Transport System (e.g. Buses), Cycling &amp; Walking.</li> <li><b>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?</b> I do <u>not</u> think a Western Relief Road would benefit the town. Why? Because traffic congestion is already eased by the new turn-offs on the M23 (especially at Pease Pottage). For those coming from the North on the M23, drivers can turn off at Pease Pottage – there is no need to drive through Crawley. From those coming from the West (e.g. Horsham), drivers can get to Pease Pottage Junction on the M23. There is no need to come through Crawley.</li> </ul>	<p>retrofit roads to give greater priority to sustainable modes. Policy CL 4 and CL5 deal with this issue in more detail.</p> <p>This is the broad objective.</p> <p>Noted. However, the difficulty is more with cumulative traffic generated by developments in and on the edge of Ifield. The road is not proposed to go ‘through’ the town but would (as envisaged) pass to the north and west.</p>
REP107/850	Town Access Group		<ul style="list-style-type: none"> <li><b>What aspects of the transport system in and around Crawley work well?</b> The bus system</li> <li><b>What aspects of the transport system in and around Crawley work less well? How could these be improved?</b> Hopefully Three Bridges Station will function better after the proposed changes. We hope for a step-free Crawley Station. There needs to be more cycle/pedestrian routes with good surfaces.</li> <li><b>In what key ways would you like transport in Crawley to be different in 2035?</b> Automotive cars. No more petrol/diesel cars. Pods that can</li> </ul>	<p>Noted.</p> <p>Noted. A lift between platforms is to be provided as part of Crawley station improvements. LCWIP and policy ST1 should assist with this.</p> <p>Policies will support move over to EVs</p>

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			<p>be called up rather than individually owned cars. Parking problems would disappear! Step-free stations.</p> <ul style="list-style-type: none"> <li>• <b>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?</b></li> </ul> <p>Yes. It would re-route much of the commuting traffic from A24 corridor and Horsham away from a high density residential area. It would end 'rat runs' through Bewbush, Gossops Green, Ifield &amp; Langley Green, lessening the pollution near 10 schools and houses.</p>	<p>and more innovative transport solutions, as will the emerging Transport Strategy.</p> <p>Support Noted.</p>
REP179/678	Savills on behalf of the Wilky Group	Policies ST1-ST4 and IN1	<p>1.0 Introduction</p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. It relates to Chapter 8, Infrastructure Provision and chapter 16 Sustainable Transport in the draft Crawley Borough Local Plan, 2019 (DCBLP).</p> <p>1.2 TWG owns about 63.3 ha (149 acres) of land east of Gatwick Airport and north and south of the M23 spur road between Junctions 9 and 9a. The plan at Appendix 1 shows the extent of the opportunity in the Gatwick/Crawley/Horley area, including Gatwick Green (59 ha). Wilky and Aberdeen Standard Investments are discussing how they can work together in respect of Wilky's strategic landholding adjacent to Gatwick Airport to bring forward an integrated mixed use development and co-ordinated infrastructure solution. In the adopted Crawley Borough Local Plan 2015 (CBLP), the Wilky land south of the M23 spur road</p>	

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			<p>(about 47.3 ha / 117 acres) forms a small part of the land that is 'Safeguarded' for a second runway at Gatwick Airport: TWG's land is required for landside facilities. Consequently, the Council has been unable to allocate the land, and instead has designated it as part of an Area of Search for a Strategic Employment Location (SEL) under adopted Policy EC1 (Sustainable Economic Growth). The Council intend to select one or more SELs in the event there is no longer a case to safeguard land for the second runway. TWG's landholdings within the Area of Search make it a major stakeholder in relation to the future of the local economy and its continued and sustainable economic growth.</p> <p>1.3 The representation will address the following consultation questions set out in chapters 8 and 16 of the DCBLP:</p> <p>General</p> <ul style="list-style-type: none"> <li>• <b>In what key ways would you like transport in Crawley to be different in 2035</b></li> </ul> <p><b>Policy ST1</b></p> <ul style="list-style-type: none"> <li>• <b>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?</b></li> </ul> <p><b>Policy ST3</b></p>	



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			<ul style="list-style-type: none"> <li>• <b>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?</b></li> </ul> <p><b>Policy ST4</b></p> <ul style="list-style-type: none"> <li>• <b>Would a Western Relief Road be a benefit to the town?</b></li> </ul> <p><b>Policy IN1</b></p> <ul style="list-style-type: none"> <li>• <b>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?</b></li> </ul> <p>2.0 Sustainable Transport and Infrastructure 2.1 TWG welcomes the Sustainability Objectives together with the Policies set out in the Sustainable Transport chapter of the DCBLP. It is recognised that the policies attempt to balance the aspirations for growth and new development with the need to minimise carbon emissions and the impact of travel on climate change and air quality. Crawley has a record of delivering genuine improvements in public transport through Fastway, which has helped achieve a shift from car to bus travel. It is also clear that recent sustainable transport measures proposed and under development as part of the Coast to Capital Growth Fund are an</p>	Support Noted

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			<p>extension of a local commitment to innovation in transport. This includes significant investment in hydrogen powered buses with zero emissions.</p> <p>2.2 The response to the questions posed in the Sustainable Transport chapter, submitted on behalf of TWG are therefore directed at clarifying the means of delivering the policies and facilitating growth whilst minimising its impact on the environment. Policies ST1, ST2, and ST3 and the Key Issues identified in para 16.5 cover the aspirations of CBC to deliver a vibrant economy, at the same time recognising the urgent need to address climate change. TWG believe that the Government's Industrial Strategy, including its focus on reducing Greenhouse Emissions alongside improving productivity, and the publication of the Future of Mobility: Urban Strategy (March 2019), provides a useful and constructive context for Crawley's Sustainable Transport policies.</p> <p>2.3 In committing to new development east of Gatwick Airport, TWG has considered the part that new employment will play in reducing the level of car-borne journeys and the means by which residents and those working in Crawley, travel around the area. This has generated a set of principles and infrastructure concepts which partially address the consultation questions and promotes a vision for Crawley, linking growth with improvements to sustainable transport which, so far as possible, achieve carbon neutral travel. These principles are:</p> <ul style="list-style-type: none"> <li>• To provide a range of high-quality employment opportunities that widen and deepen the skill base of</li> </ul>	

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			<p>residents in Crawley and its immediate neighbours. This will reduce levels of “out-commuting” and therefore the length of trips. Shorter journeys are made more easily by active modes, walking and cycling and potentially, personal electric transport.</p> <ul style="list-style-type: none"> <li>• To link new and existing residential development with employment opportunities through infrastructure and transport services that cater for carbon neutral modes of travel, potentially reducing reliance on the private car and in line with the concept of Mobility as a Service, (MAAS).</li> <li>• To ensure a consistent approach to the delivery of new transport services and infrastructure across borough/county boundaries and to work in partnership with relevant agencies such as the Coast to Capital LEP and Transport for the South East (TfSE).</li> <li>• To achieve a high level of integration between carbon-neutral modes by providing strategically located and high quality interchange facilities (the concept of superhubs is already established in Crawley).</li> <li>• To plan development and sustainable transport comprehensively with new employment and residential locations linked, to avoid “piecemeal” growth which focusses on the exclusive needs of individual sites and occupiers.</li> <li>• To encourage new development that has the scale and value necessary to deliver investment in innovative and carbon neutral transport services and infrastructure.</li> <li>• To establish a multi-modal, comprehensive and flexible Sustainable Transport Strategy which is phased in line with new development. It is recognised that this will</li> </ul>	

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			<p>include some limited new road links to address gaps in the highway network and provide alternative route choices. These should not be primarily aimed at expanding capacity for private car use, but would assist in providing flexible transport corridors, including priority for low emission vehicles, e.g. hydrogen buses operating on the Fastway network and high occupancy electric transit. Critical to delivering the transport infrastructure will be a clear funding strategy based on a borough-wide model that pools available public funding with developer contributions through the CIL or a comprehensive approach to securing planning obligations.</p> <p>2.4 TWG has sought, in discussion with existing transport and network providers, to “operationalise” the principles set out above and thereby to demonstrate that new employment at Gatwick Green would significantly contribute to the simultaneous delivery of growth and a reduction in carbon emissions. The following are examples of measures to address the question defined in the Sustainable Transport chapter of the Draft Local Plan “<b>In what key ways would you like transport in Crawley to be different in 2035</b>”:</p> <ol style="list-style-type: none"> <li>1. A transit service which is consistent and complementary with existing bus routes operated by zero emission vehicles and capable of conversion to a more sophisticated Guideway system and/or light tramway.</li> <li>2. Dedicated infrastructure along newly identified routes which would function as a Flexible Transport Corridor, (FTC) linking development sites with existing interchanges and destinations. These routes would</li> </ol>	

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			<p>encompass the latest thinking in terms of flexible movement using e-bikes, e-scooters (subject to legislation), and “personal transport” solutions, which will form the basis of movement. Such carbon neutral / low-carbon solutions would help to mitigate the causes of climate change and improve urban air quality, currently a key national objective.</p> <p>3. High quality and strategically located transport interchanges with a focus on sustainable modes. The concept of “super-hubs” is consistent with this aspiration.</p> <p>4. New road infrastructure to accommodate all travel modes and to bypass existing congestion hotspots. The principle is to plug gaps rather than significantly expand capacity. In this context, TWG believes that the answer to the consultation question “<b>would a Western Relief Road be a benefit to the town</b>” rests on its capacity to accommodate the full range of transport modes.</p> <p>5. New pedestrian and cycle links utilising existing routes where possible with an emphasis on safety and the protection of vulnerable road users. These may form part of 2 above.</p> <p>2.5 It is important to stress that TWG believes these measures form part of an integrated “whole” with new development contributing to the delivery of the linked network of sustainable travel opportunities. In this regard and to address the questions posed in connection with Policy ST1, the DCBLP is broadly consistent with national planning policy requirements, is justified and appropriate. However, in its current form</p>	<p>Noted. Policy ST4 amended to include bus priority measures</p>

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			<p>the policy would benefit from a clearer statement that sustainable growth means growth that delivers a significant shift towards efficient carbon neutral transport arrangements. The policy could therefore more clearly state that growth (residential, retail and employment) must be accompanied by major investment in alternative transport networks and methods. The Policy might additionally define an explicit set of measures to inform stakeholders of the requirements likely to flow from new development along with a definition of the components of a comprehensive, sustainable transport strategy associated with various sites. This would apply to Gatwick Airport as well as other growth points to ensure an integrated land-use/transport approach.</p> <p>2.6 TWG is broadly supportive of Policy ST3 on Improving Rail Stations, along with the distinctive roles defined for each of the stations. Access to Gatwick Rail Station is currently difficult for those using it as a surface interchange. It is essential that Gatwick is recognised as a station that serves all the community and facilitates access by sustainable modes of surface transport, cycle, pedestrian and bus/transit services.</p> <p>2.7 In response to the Consultation questions relating to Infrastructure Provision in the DCBLP, TWG has a generic observation. Whilst it is recognised that reference is made to the Community Infrastructure Levy (CIL), there is no clear link between the policies defined in the Sustainable Transport chapter and Policy IN1 covering Infrastructure Provision. TWG considers this is likely to be a consequence of the</p>	<p>Policy has been further amended to underscore importance of sustainable modes for large-scale developments (Mobility Strategy requirements). Approach to S106 for sustainable transport set out in Planning Obligations Annex. LCWIP/Transport Strategy will also do some of this work.</p> <p>Noted.</p> <p>Planning Obligations Annex has been included to provide clarity about what will be funded by what form of</p>

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			<p>focus on the (historic) distinction between providing new roads to address capacity and Mobility as a Service, with greater focus on the introduction of public transport services, new interchanges and dedicated transport routes for zero emission travel.</p> <p>2.8 It is therefore suggested that in keeping with the Government's Industrial Strategy: Future of Mobility, a more holistic approach is adopted in the DCBLP to ensure a full and comprehensive cross-reference between infrastructure and the future provision of sustainable transport. This would also serve to encourage an integrated approach to the siting of new development and its associated access and transport requirements.</p> <p>2.9 A comprehensive, employment and residential development strategy, aligned with an integrated approach to travel will play an important part in delivering Local Plan policies. An explicit policy which sets out to encourage development which addresses the challenge of climate change, through contribution to a clear and defined sustainable transport strategy, will serve to strengthen the Plan. This could build on both committed and proposed investment in Crawley, but crucially should see new development as an opportunity to deliver innovative transport solutions and exploit the emerging technologies designed to minimise greenhouse gasses.</p> <p>2.10 In meeting the aspirations of the DCBLP, TWG believes that Gatwick Green is a good example of new development that would achieve economic growth and help to shape a transport system fit for purpose and</p>	<p>developer contribution.</p>

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			<p>designed for future generations. Gatwick Green is strategically located at the confluence of several major transport networks, so is uniquely placed in view of its scale and location to deliver modal shift and significant components of the wider sustainable Transport Strategy.</p> <p>2.11 A piecemeal / ad hoc approach will fail to achieve the sustainable transport benefits referenced in this representation. The absence in the DCBLP of a Strategic Employment Location (SEL) and identified housing allocations within/outwith Crawley Borough means there is a risk that the opportunity to achieve highly sustainable transport and travel will not be fully realised. It is crucial the DCBLP defines measures which will achieve a significant shift from travel by private car, especially for trips of less than 5 miles. Such measures need to be aligned with the proposed development sites in the Local Plan.</p> <p>3.0 Conclusions</p> <p>3.1 This representation sets out a clear manifesto for the range of sustainable transport initiatives and infrastructure that should be part of Crawley's future transport vision, enabled and delivered though well planned growth and development, integrated and aligned with public funding. This vision can only be fully achieved through planning effectively for employment growth east of Gatwick – a strategic opportunity known as Gatwick Green – and residential development within and sustainably located adjacent to the Borough. To achieve these objectives, TWG has put forward the need for a multimodal, comprehensive and flexible</p>	



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			<p>Sustainable Transport Strategy, which is phased in line with new development. The soundness of the DCBLP will depend on such a Strategy coming forward alongside any growth proposed. It will, of its nature, need to be a joint strategy with the authorities neighbouring Crawley to ensure funding is secured, apportioned and directed in line with mutually agreed priorities.</p> <p>3.2 In relation to the policies referred to in this representation, TWG has suggested that some of these would benefit from adjustment to clarify their purpose and objectives:</p> <p>Policy ST1</p> <ul style="list-style-type: none"> <li>• A clearer statement that sustainable growth means growth that delivers a significant shift towards efficient carbon neutral transport arrangements.</li> <li>• More clearly state that growth (residential, retail and employment) must be accompanied by major investment in alternative transport networks and methods.</li> <li>• Define an explicit set of measures to inform stakeholders of the requirements likely to flow from new development along with a definition of the components of a comprehensive, Sustainable Transport Strategy associated with various sites.</li> </ul> <p>Policy ST4</p> <ul style="list-style-type: none"> <li>• Add a reference to its capacity to accommodate the full range of transport modes</li> </ul>	<p>Policy ST1 has been responding to the first two bullet points here.</p> <p>LCWIP and Transport Strategy are being progressed alongside the Local Plan. For Gatwick Green (and other sites previously affected by safeguarding for an additional southern runway) the proposed North of Crawley Area Action Plan will provide a framework for this.</p>

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REP162/565	Sussex Ornithological Society	Topic Area E	<p><b>Topic Area E – Natural Environment.</b></p> <p>26. Section 2 states that “...the National Pollinator Strategy 2014 and West Sussex’s Pollination Action Plan 2019-2022 are current national and county plans that are encouraging a movement towards a net gain in biodiversity and natural capital.” Whilst these are welcome initiatives, to suggest that they will achieve a <b>net</b> gain in biodiversity is wrong for the reasons outlined in 16 above. Yes they should achieve a gain but Crawley needs to do far more to more than offset the harmful biodiversity impacts of their Local Plan development proposals so that an overall net gain is achieved. The word “net” therefore needs to be deleted.</p> <p>27. Crawley has a particularly rich amount of protected and open green spaces, including 12 LWS’s, 6 Local Nature Reserves, ancient woodland, parks and recreation areas and a Green Infrastructure network. Much of this is owned/ controlled directly by the Borough Council, (including the Nature Reserves). Tilgate Park is a particularly large area.</p> <p>It is therefore disappointing to see that as part of the Local Plan/ Sustainability Appraisal there appears to be no stock take of the current biodiversity quality of these areas and no plans to ensure that the biodiversity value of these areas is maintained or even improved (to contribute towards meeting the NPPF requirement to deliver a net gain in biodiversity). This appears to be a major omission.</p> <p>28. Table 4.3 suggests a worthwhile objective under item 6, namely to “Conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough”. However the examples of indicators are, to put it mildly, unimpressive. The only quantifiable measure proposed is “Amount of trees with tree preservation orders lost annually”</p> <p>And section E2 (page 59) shows that there has been a net loss of trees with TPO’s over the three years reported, so this is currently going the wrong way. (And there appear to be no plans being put forward to change this).</p>	<p>Net has been removed with an additional line added: “the mechanisms for ensuring this gain occurs are still being implemented as there are a variety of smaller interventions and design mechanisms that could contribute to creating a net gain standard.”</p> <p>An additional indicator has been added that will provide measurable results for trees and soft landscaping in the future.</p> <p>Though working with Amenity Services we are aware of areas of nature that are in need of improvement.</p> <p>LWS in Crawley which are owned by the Council have a management plan detailing necessary treatment and care needed for that natural area to improve the quality of biodiversity in Crawley. Your advice is welcome in helping lead to the conclusion that our management plans can be more efficient using SMART goals.</p> <p>Hectares and percentages of land in Crawley of designated habitats (ancient woodland, deciduous woodland etc. have been included in Topic E of the Sustainability Appraisal.</p>

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			<p>29. We believe that much more work needs to be done on the environment and biodiversity elements of the Sustainability Appraisal, with a particular focus on improving the quality of biodiversity in Crawley's numerous green spaces so as to make this a major contribution to delivering a net gain in biodiversity. It is hard to see how the Crawley Local Plan can hope to offer any net gain in biodiversity without its open spaces contributing towards this. There are very many losses of biodiversity that are going to occur because of the development plans that are being put forward in the Local Plan, and these need to be more than offset.</p> <p>30. Therefore, positive plans to improve biodiversity in Crawley's green spaces need to be developed, measured and reported on, and monitoring needs to be much more comprehensive than proposed in this document. As a minimum we would hope to see an inventory of the current biodiversity quality of key Borough-owned LWS's and Local Nature Reserves, listing key species including Section 41 Species. These need to be supported by Management Plans with clear and measurable goals that will deliver net gains in biodiversity.</p>	
REP169/589	Judith Ashton Associates on behalf of A2Dominion Homes Ltd.		<p>In addition to the above, we have to say we are concerned that the Sustainability Appraisal/Strategic Environmental Assessment Scoping Report and Draft Report has not actually demonstrated that all reasonable alternatives have been assessed when considering the environmental effects of the Plan.</p> <p>The appraisal of the housing policy on p135 – 138 suggests 4 options were considered:</p> <p>Option 1: Housing requirement based on the Government's standard method for calculating housing need, including the cap (476 dwellings p.a.) – see p136</p> <p>Option 2: Affordable housing needs locally determined housing requirement (minimum of 527 dwellings per annum). These figures to be revised with data from updated SHMA.</p>	<p>The precise supply-led figure has been revised following the Reg. 18 consultation and call for sites, and there may be potential for this to change as the examination proceeds. The policy is clear that the figure is a minimum and that options will be explored to increase delivery. In the meantime it is considered reasonable to consider the merits in principle of adopting a supply-led requirement, as assessed in Options 4 and 5 regarding Policy H1 (in the updated SA).</p> <p>The SA assessment in relation to Policy H1 has been reviewed and now</p>

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			<p>Option 3: 'Supply-led' locally determined housing requirement (minimum of 320 dwellings p.a. over period 2020-2035, stepped as a 451 requirement over years 1-5 and 255 in years 6-15).</p> <p>Option 4: 'Supply-led' locally determined housing requirement (minimum of 320 dwellings p.a. over period 2020-2035, stepped as a 451 requirement over years 1-5 and 255 in years 6-15) with 'unmet need' expressed.</p> <p>The SA goes on to state that option 4 was chosen as <i>'A supply-led housing figure is recommended in view of the constrained nature of the borough in terms of land supply. It is considered that annual provision significantly above these levels could not be sustained over the Plan period to 2035, as informed by the council's urban capacity, open space, economic growth and transport modelling work.</i></p> <p><i>Mitigation of negative impact on SA Objective 4 (Opportunity to live in a decent and affordable home) is provided by establishing the amount of unmet need arising from the borough within the policy and identifying the scope of work required by the council to ensure this need is met within sustainable and accessible locations suitable for residents of Crawley. This is expected to be achieved through effective Duty to Cooperate working across the Housing Market Area and with ongoing wider partnership workings to ensure the delivery of sufficient housing in the mid to longer term where this is in accordance with other sustainable planning policies.'</i></p> <p>In the first instance option 1 is not the standard method figure of 752 dwellings referred to in the Reg 18 Plan so the implications of not meeting the standard method figure have not been explored in the SA. Secondly in adopting a supply led figure when, we would suggest, the full extent of the supply has yet to be quantified given both our comments above and the fact a new call for sites is in progress, suggests a preconceived approach to what the borough can achieve, rather than a positive approach to site selection and plan making, so is proceeding contrary to the advice in the NPPF.</p>	<p>5 options are considered, including the option of meeting the 752d.p.a requirement in full, as suggested, as well as the option of adopting a (much) higher requirement of 1848d.p.a. for the purpose of meeting the borough's identified affordable housing need (assuming an affordable housing requirement of 40%).</p>

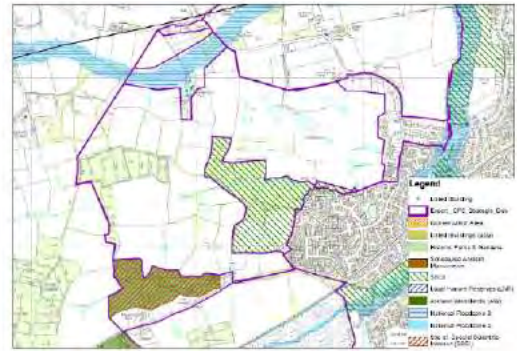

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			The SA should assess all reasonable alternatives, including the implications of complying with the housing requirement in full – only then can its implications be truly considered. Which given one of the sustainability objectives of the Reg 18 Plan (as set out at appendix a) is: <i>'To ensure that everyone has the opportunity to live in a decent and affordable home'</i> would suggest that the SA is not, in reviewing its reasonable alternatives, actually looking at an option that meets the sustainability objectives of the plan – which cannot be right.	
REP184/733	Sussex Wildlife Trust		Sustainability Appraisal SWT encourages CBC to ensure that the parameters that it intends to use to assess the impacts of the plan are effective in what they are trying to measure. We suggest they look at the effectiveness of these measures in relation to the last iteration of the Local Plan and Sustainability Appraisal to consider whether the sustainability predictions the previous SA came to fruition in terms of impacts on the sustainability objectives. With a clear focus on the need for planning to deliver net gains to biodiversity, CBC need to ensure they have a sufficient evidence base in place and effective monitoring of targets to demonstrate how this net gain has been achieved.	Your concerns regarding the effectiveness of measuring the value of the natural environment within the Sustainability Appraisal are noted. New indicators have been added to help monitoring of various habitat designations.
REP185/748	Carter Jonas on behalf of Homes England		<b>CRAWLEY BOROUGH COUNCIL LOCAL PLAN REVIEW 2020-2035 - SUSTAINABILITY APPRAISAL SCOPING REPORT (JULY 2019)</b> On behalf of our client, Homes England, please find enclosed representations to Crawley Borough Council's Local Plan Review 2020 – 2035 (Regulation 18) Sustainability Appraisal Scoping Report (hereafter referred to as "CBCLPR SASR"). Homes England is an executive non-departmental public body, sponsored by the Ministry of Housing, Communities and Local Government (MHCLG). Homes England is the government's housing accelerator. Homes England has the appetite, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities. Homes England works in collaboration with partners who share our ambition. These include local authorities, private developers, housing	

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			<p>associations, lenders and infrastructure providers. Within the next few years, Homes England will have invested over £27 billion across our programmes.</p> <p>Homes England mission is to intervene in the market to ensure more homes are built in areas of greatest need, to improve affordability. Homes England will make this sustainable by creating a more resilient and diverse housing market.</p> <p>Homes England has experience in acting as a 'master developer' on schemes such as the Northern Arc in Burgess Hill. In the case of Burgess Hill, we acquired the site, which has been identified as a location for major housing delivery for over 10 years but had stalled due to the complexities of land ownership and the need for upfront strategic infrastructure delivery. Homes England worked closely with Mid Sussex District Council, the landowners and the site promoter to acquire the land. At the Northern Arc, we are investing in the required infrastructure to release the first phases of development early.</p> <p>At West of Ifield, we will take a similar approach as the master developer to accelerate the delivery of key infrastructure to enable housing to be built out quickly.</p> <p>Furthermore, acting as a master developer will enable Homes England maintain the highest design standards across the scheme from outset to completion as well as delivering significant social, economic and environmental benefits to the existing neighbourhoods of Crawley.</p> <p>These representations relate to the promotion of Rowley Farm for employment uses and of which a Call for Sites submission has also been made by Homes England under</p> <p>separate cover, and also to specific policies and proposals in the CBCLPR including the safeguarding of land for the expansion of Gatwick Airport (GAT2), the safeguarding of</p> <p>the proposed Crawley Western Relief Road ('CWRR') (ST4) and those policies that relate to urban extensions and which are relevant to the proposed development of land west of Ifield.</p>	

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			<p>Each representation is set out under a separate heading below and reflects the tests of soundness set out in the NPPF (paragraph 35) that plans should be positively prepared, justified, effective and consistent with national policy.</p> <p><b>Reliance on At Crawley 2009 study</b> Homes England considers that the use and reliance on the 'At Crawley 2009 Study' does not reflect the best practise guidance set out in the NPPF at paragraph 31 which states, 'the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.' (our emphasis) The Study is currently 9 years old and hence cannot be considered to be up to date.</p> <p>As the Local Plan will be in place until 2035 and given the strategic importance of some of the infrastructure required, an up to date evidence base must be in place to ensure the Plan reflects the tests of soundness set out in the NPPF (paragraph 35), ie, be positively prepared, justified, effective and consistent with national policy. This approach will then accord with the Planning Practice Guidance (Paragraph: 001 Reference ID: 61-001-20190315), where it states, '<i>it is essential that plans are in place and kept up to date</i>'. If the Council proposes to rely on the recommendations of a document that examines the potential for strategic development both within and beyond Crawley's boundary, Homes England considers that is essential that it is updated to inform the revised spatial development strategy.</p> <p>The introduction to the document states:  <i>"The Study develops a previous iteration of the At Crawley Study prepared by Atkins in 2005. Building on this previous work, it takes a fresh look at the potential for strategic development at Crawley ... it provides a consistent assessment of the suitability, availability and achievability of strategic development locations ... it considers what infrastructure would be necessary to support strategic development ... the Study is intended to ensure that future strategic</i></p>	<p>There is no reliance on the At Crawley Study, and the "At Crawley" Study boundary has been removed from Fig 2.1 in the SA (and Fig 2 in the Local Plan). Paragraph 2.14 of the SA explains that the focus of the Local Plan will be upon Crawley Borough, but that growth to meet Crawley's unmet needs may take place in neighbouring authorities, and that the SA/SEA for these developments would be the responsibility of the relevant Planning Authority.</p>

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			<p><i>development at Crawley is highly sustainable, properly planned and supported by timely provision of adequate infrastructure. It aims to ensure that future strategic development is of a high quality and supports the town as a whole.” (paragraphs 1.3-1.5) A two tier assessment was undertaken. The first stage involved the identification of key sustainability constraints to development where planning approval for development within a viable timescale would be at higher risk. The defined Tier 1 constraints (Figure 3.1) were considered most significant given the relative sensitivity associated with these areas and their legal status. These included location in the 60dBa noise contour of Gatwick Airport, location in Flood Zones 2 and 3 as identified in the SFRA, location within an SSSI, SAC*, SPA*, National Nature Reserve* or RAMSAR* (* not actually present in the Study Area) and location within an AONB. The assessment of Tier 1 constraints and patterns of landownership and options informed the identification of potential options. Each of the options identified was considered to provide potential to accommodate either residential-led development with capacity to accommodate c.2,500 dwellings and associated uses as a sustainable urban extension in accordance with the neighbourhood principle – or, particularly where not suitable for residential development, to accommodate strategic employment.</i></p> <p><i>The second stage of assessment evaluated the options against a wide range of sustainability criteria. Each option was ranked positive, neutral or negative against each sustainability objective. The resulting assessment considers the potential for strategic development of 11 locations, one of which was an area of land west of lfield.</i></p> <p><i>The extent of this area is identified on the Plan below – Site F:</i></p>	



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			 <p>The assessment concludes at paragraph 9.77 that “the site can thus be regarded as a <b>suitable location for a new neighbourhood.</b>”</p> <p>The SASR relies upon the 2009 study to define the area for search and review of locations for development, and to indicate areas likely to be impacted by development (paragraph 2.15).</p> <p>Homes England considers that the opportunity should be taken to update the study and to appraise a larger area. The existing area is shown on Figure 2.1 in the study and this is provided below, on which Homes England has identified in red the boundary of the larger area that it considers should be studied:</p> 	

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			The Council has acknowledged that the extent of the area should be kept under review and updated, as appropriate. As the Council is just starting the formal consultation process, Homes England considers that it is appropriate now to enlarge the extent of the area to be surveyed.	
REP185/749	Carter Jonas on behalf of Homes England		<b>Strategic Policy LC5: Development Outside the Built-Up Area</b> The preferred option (1) selected seeks to develop local policy to maintain Crawley's compact nature and attractive setting whilst conserving and enhancing the countryside. In light of Homes England's comments on the evidence base, the detail of the policy is likely to be unsound because it is not based on up to date consideration of the potential for development on the west side of Crawley.	The SA/SEA for potential development on the west side of Crawley is the responsibility of the relevant Planning Authority.
REP185/750	Carter Jonas on behalf of Homes England		<b>Policy CD5: Local Design Standards</b> Homes England agrees to the decision to choose Option 2. However, in its representations on the draft Local Plan, Homes England expressed support for the use of Area Wide Character and Design Assessments for all substantial new development, and has suggested that these should not be the responsibility of the Council but should be prepared by the developer. This because the Council does not have the resources to undertake these assessments and could lead to delay development from coming forward.	Crawley Borough Council will be bringing a programme forward, over time, of Area Wide Character and Design Assessments. However, we welcome developers supporting us in their delivery.
REP185/751	Carter Jonas on behalf of Homes England		<b>Strategic Policy GAT2: Safeguarded Land</b> The decision to safeguard land is noted and it is correct that Option 2 has been rejected. The Council's justification is that " <i>the Aviation green paper advises that it would be prudent to safeguard land, where there is robust evidence.</i> " Homes England does not consider there is robust evidence to safeguard the extent of land proposed in light of GAL having confirmed (29th August 2019) the process is now underway for the submission of a development consent order (DCO) seeking permission to bring its northern runway alongside the main runway by the mid-2020s. We therefore consider the extent of land reserved could be excessive because the use of the emergency runway will provide for the airport's growth. As such, Policy GAT2 is not sound because it relies on out of date evidence and does not take	Policy GAT2, safeguarding, has now been deleted from the Local Plan as the council does not consider there is sufficient evidence, at this time, to safeguard this extent of land for a future southern runway at Gatwick Airport. The area previously safeguarded is included within an area designated for the preparation of an Area Action Plan, after the adoption of the Local Plan. This will give the opportunity for the future growth needs of the airport to be

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			<p>into account less land may be required given the work is now progressing with regards the DCO application.</p> <p>Homes England has proposed that Gatwick Airport should provide up to date evidence of how much land might be required so that the Local Plan will be informed by up to date evidence.</p> <p>It is also consider that the use of out of date evidence stymies suitably located sites being developed which would assist the Council in meeting its employment targets and also, achieving the priorities of The Coast to Capital Strategic Economic Plan.</p>	considered alongside other development and infrastructure needs, as well as environmental protection requirements. The AAP will be the subject of its own SA/SEA.
REP185/752	Carter Jonas on behalf of Homes England		<p><b>Strategic Policy H1: Housing Provision</b> Noting the borough's challenges to accommodate development within its administrative boundary, Homes England considers the decision to choose Option 4 to be sound, provided the Council works positively and collaboratively with neighbouring authorities to meet Crawley's unmet housing needs.</p>	Support noted.
REP185/753	Carter Jonas on behalf of Homes England		<p><b>Strategic Policy H3g: Urban Extensions</b> Homes England considers the decision to choose Option 1 and use a typology for any urban extensions to Crawley is robust, provided a number of changes are made to the policy which are contained with separate submissions made to the Council. These relate to criteria i., ii., iv., x., and xii. of the policy.</p>	Support for an Urban Extensions policy noted. Responses to the suggested changes to the policy are covered in the Local Plan Consultation Statement.
REP185/754	Carter Jonas on behalf of Homes England		<p><b>Strategic Policy GI2: Biodiversity and Net Gain</b> Whilst Homes England supports the decision to choose Option 1 and had proposed that a specific requirement to achieve a 10% net gain for biodiversity should be included in the policy. This requirement will be included as part of the Environmental Bill which will be introduced later this year and to ensure the policy is up to date and relevant upon adoption, Homes England suggest the first paragraph should include this requirement.</p>	This has been noted in GI2 and in the Sustainability Appraisal Topic Area E – Natural Environment. Recognition of at least a 10% new gain per new development has been included in the sustainability appraisal and policy GI2.
REP185/755	Carter Jonas on behalf of Homes England		<p><b>Strategic Policy GI4: Local Green Space</b> Homes England considers the selection of Option 1 is not sound. It proposes that Green Belt policy tests be used to protect Local Green Space and this approach does not accord with the guidance in the NPPF. Homes England has proposed revisions to this policy.</p>	Disagree – GI4 is an adopted policy. Ifield Brook Meadows and Rusper Road Playing Fields is a very special area for Crawley, designated as such due to its particular qualities in terms

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				of nature, heritage, recreation, landscape, tranquillity and access to the wider countryside. Local green space is a particular designation, and whilst GB policies apply, it doesn't negate the opportunity for local policy to reflect the particular reasons why the specific site is valuable.
REP185/756	Carter Jonas on behalf of Homes England		<p><b>Policy ST3: Improving Rail Stations</b> Homes England considers the spatial development strategy that focuses development around stations to be sound, but considers that the policy should be amended to read <i>"at Ifield Station, strengthen its role as a suburban station meeting the needs of current and future residents in the west of the town;"</i>.</p> <p>Linked to this, Homes England notes the reasoned justification at paragraph F8 (page 64) that <i>"it is the position of Network Rail that any further development that would increase demand at Ifield station should consider the need to provide improvements to the station platforms, and disabled access."</i></p>	Policy and supporting text amended.
REP185/757	Carter Jonas on behalf of Homes England		<p><b>Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Relief Road</b> Homes England considers the decision to choose Option 4 to be sound and has submitted representations to the draft Local Plan that the extent of land shown to be safeguarded is too extensive. However, Homes England considers that a clear case is made for the removal of the eastern section between the A23 London Road and Gatwick Road given the specification of the A23 dual carriageway already in place. Not only would this approach reduce the environmental effects of the new road but it would allow for the logical extension of Manor Royal and add to the employment land pipeline – a key priority of the Council.</p>	The eastern section of the Search Corridor has been deleted. The corridor is included and referenced in the Area Action Plan policy.
REP196811	Environment Agency		<p><b>SEA Scoping Report Draft</b> The recognition of flooding as a specific issue that benefits from the inclusion within the Local Plan is noted, and welcomed. Policy that</p>	Support noted. Updated SFRA and Water Cycle Study is underway.

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			<p>strengthened the requirements for all development to ensure that flood risk from all sources is managed for the lifetime of a development should be in place.</p> <p>Reference to updating the SFRA and Water Cycle Study (A14) is noted. These documents are important in understanding and clearly setting out flood risk and water management aspects and should be reflective of the most up to date information available.</p> <p>Due to the nature and extent of the flood risk within Crawley Borough, choosing to include a locally specific flood risk management policy under EP1 does seem a prudent way forward. The choice of Option 1 for EP2 would also offer a more appropriate policy direction for this type of development proposal.</p>	
REP196/814	Environment Agency		<p><b><i>Sustainability Appraisal/Strategic Environmental Assessment Scoping Report and Draft Report</i></b></p> <p>Para A3 refs - "Thames Water Draft Water Resources Management Plan 2019 (Thames Water, 2019)" - The latest document is the "Revised draft Water Resources Management Plan 2019", dated October 2018</p> <p>Para A3 refs - "Southern Water, Water Resources Management Plan 2015-2040 (Southern Water, 2015)" - The latest document is the "Revised draft Water Resources Management Plan 2019, Addendum to Statement of Response", dated June 2018. Has this been considered?</p> <p>Para A3 refs - No reference to SES Water's plan. The latest document is "Revised Draft Water Resources Management Plan 2019", dated September 2018.</p> <p>Para A3 refs - No reference to South East Water's plan. The latest document is "Revised Water Resources Management Plan 2020 to 2080".</p> <p>Para A17 - "significant water stress" - our own terminology is "serious" water stress. This paragraph refers to "the Plan period to 2030". That presumably was the limit of the old water cycle study.</p> <p>Para A18 "Water Supply Management Plans" – capitals</p>	<p>Documents updated and added in paragraph A3. Updated SFRA and Water Cycle Study will assess latest evidence in Resource Management Plans.</p> <p>Amendment made.</p>

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			<p>Para A19 table for indicator A8 - The 2017/18 figures quoted here have very recently been superseded by 2018-19 data. Per capita consumption in 2018-19 was higher owing to the hot weather. "The Regional Economic Strategy target is 135 litres per day by 2016" - was? Reference could also be made here to aspirations in water company plans, especially Southern Water's "Target 100".</p> <p>Para F2 refs - "Draft Water Resources Management Plan 2019 (Thames Water, 2018), Draft Water Resources Management Plan 2019 (South East Water, 2018), Draft Water Resources Management Plan 2019 (Sutton and East Surrey Water, 2018), Water Resources Management Plan for 2015-40 (Southern Water, 2014)" - see Para A3 refs above.</p>	<p>Amendment made.</p> <p>Amendment made.</p> <p>Amendments made.</p>
REP196/818	Environment Agency		<p><b><i>Sustainability Appraisal / SEA (Scoping Report &amp; Draft Report)</i></b></p> <p>Page 13 - Water is mentioned in section A, climate change, but not in section E, the natural environment. Any growing urban area will place additional stress on the natural environment, including the aquatic environment, so this should have been highlighted in section E of the Sustainability Appraisal.</p> <p>Page 14 and Page 16 refer to water supply, sewerage and pollution. <i>"The potential for development to be concentrated in the Crawley area may lead to water supply issues"; "The potential for development to be concentrated in Crawley may lead to sewerage capacity problems"; and "Crawley's role as an economic hub and transport interchange means the town's contribution to air, land, water and noise pollution is likely to increase".</i></p> <p>Page 62 – <i>"A thorough consideration of the strategic infrastructure network is to be undertaken to ensure that development does not outstrip essential infrastructure, such as sewerage and water".</i></p> <p><i>The two sections above, Pages 14-16, and Page 62, together demonstrate the need for these issues to be adequately addressed in the Local Plan. The link between water supply and water quality (which is directly related to sewerage provision) has not been adequately addressed in the Local Plan.</i></p>	<p>Waterways has been included in topic area E, as has reference to the fact that any growing urban area will place additional stress on the natural environment, including the aquatic environment.</p> <p>A Water Cycle study is currently being commissioned and is due to be completed February/March 2020. The Environment Agency have already been involved in this process.</p>

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			<p>Page 21, A16 – “There is a risk that potential new strategic development and increased population, combined with the level of economic development, could exacerbate water supply issues and associated water quality and infrastructure capacity issues. Therefore, an updated Water Cycle Study will be commissioned to investigate how best the issue of water stress can be addressed”.</p> <p>Page 32, A20 – “As well as potentially adding to water supply stress, new development at Crawley will invariably take up sewerage network capacity. To establish whether there is sufficient sewage treatment and network capacity to accommodate identified levels of residential and economic growth, an updated Water Cycle Study will be undertaken”.</p> <p>A16 and A20 demonstrate the need for a new Water Cycle Study. The Local Plan should give a clear commitment when this will be completed as this will help address many of the water related issues.</p> <p>Page 163, Policy SDC3: Tackling Water Stress: “Development of a local plan policy to mitigate the impact of development on the water environment. Crawley is situated in an area of serious water stress, and recommends the local plan should include policy to help mitigate the impact of development on the water environment.</p> <p>Policy SDC3 highlights the importance of a section dedicated to water in the local plan.</p>	Support for water stress policy noted.
REP211/049	Natural England		<p><b>SUSTAINABILITY APPRAISAL (SA) COMMENTS</b></p> <p>Natural England concurs with the findings of the SA scoping report and SA draft report.</p>	

<b>HABITAT REGULATIONS SCREENING REPORT</b>				
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REP162/566	Sussex Ornithological Society		<u>Habitat Regulations Assessment Screening Report</u> 31. SOS agrees that an Appropriate Assessment is not required.	Noted.
REP211/950	Natural England		<b>HABITATS REGULATIONS ASSESSMENT (HRA) COMMENTS</b> Natural England concurs with the findings of the HRA Screening report.	



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REP155/525	West Sussex County Council	Page 30	<b>Transport – Rail (page 30) Current Findings - 5<sup>th</sup> bullet point:</b> The Network Rail Croydon Area Remodelling Scheme (CARS), which includes improvements to junctions in the ‘Selhurst Triangle’ – this includes Windmill Bridge Junction - north of East Croydon station, along with two additional platforms at East Croydon station is key to capacity improvements on the Brighton Main Line which will allow for increased services along with greater reliability and faster recovery of service from incidents of disruption. This major project has been consulted upon in Autumn 2018 for a Transport and Works Act Order, but is currently funded for the design stage including a further consultation on design in 2020, with funding for construction remaining to be confirmed.	This has been included.
REP155/526	West Sussex County Council	Page 32	<b>Transport – Road (page 32) Evidence base:</b> A number of the documents listed in the evidence base, notably including the Transport Assessment documents which are specific to the Local Plan are now ageing. There were also weaknesses in the model accuracy for representing the PM peak, which were accepted at the time for reasons of resources but should not be carried forward to the new plan. Whilst the transport modelling for the Crawley Sustainable Transport Package is more recent, being based on a 2015 base year with forecasting years of 2030 and 2045, this is still considering infrastructure schemes based on adopted Local Plan assumptions along with updated consents and does not consider continued Local Plan allocations to the new end of Local Plan year of 2036. There is therefore a need to renew the transport evidence base to inform Reg 19 consultation, submission and examination.	Transport Modelling is to be updated to inform the Plan.

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			<p><b>Current Findings – 2<sup>nd</sup> bullet:</b> This requires re-wording for improved clarity, as whilst these junctions were not over capacity due to background growth, the reason for requiring mitigation is that the travel demand resulting from adopted Local Plan development is forecast to push them over capacity.</p> <p>It is suggested that it is rewritten to read “<b>Transport Assessment identified a number of junctions that perform significantly worse as a result of development proposed in the Local Plan, although not already over capacity from background growth and would require mitigation to return them to capacity.</b>”</p> <p>In addition, the signalisation of Bewbush Manor Roundabout is not mentioned in this section.</p> <p><b>Future Studies and Plans:</b> This point is supported by WSCC, for the reasons stated in the comments on the existing evidence base. Prior to forecasting for the Local Plan period to 2036, there is a need to update the base year transport model from 2015 to ensure that that the model base year validation remains less than five years prior to when the evidence is considered at examination. The County Council is happy to discuss the methodology and likely timescale for this with the Borough Council in more detail within officer level meetings. The transport study should prioritise transport solutions increasing the use of sustainable modes including public transport, walking and cycling ahead of further improvements to highway capacity within the urban area of Crawley, whilst residual capacity improvements should not be precluded to resolve identified severe impacts, when other measures</p>	<p>Change made.</p> <p>We understand that this is required to support Kilnwood Vale rather than development within Crawley.</p> <p>Comments noted.</p>

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			alone cannot achieve sufficient mitigation to meet the NPPF policy test.	
REP155/527	West Sussex County Council	Page 34	<p><b>Transport – Walking and Cycling (page 34) Future Studies and Plans:</b> this currently reads “Crawley Borough Council is currently developing an LCWIP (Local Cycling and Walking Infrastructure Plan). This will identify future around 10 or so routes or further development following a 6-step process prescribed by the Department for Transport (and will include cost estimates).”</p> <p>Should this read, “Crawley Borough Council is currently developing an LCWIP (Local Cycling and Walking Infrastructure Plan). This will identify approximately 10 routes for further development following a 6-step process prescribed by the Department for Transport”?</p>	Change made.
REP155/528	West Sussex County Council	Page 35	<p><b>Transport – Bus (page 35):</b> improvements are needed at Broadfield bus stopping area at Broadfield shops; the current stopping area does not have the capacity to accommodate the number of buses that use this area.</p>	Change made.
REP157/537	Department for Education		<p>24. Whether in addition to or in replacement of the IDP, the Council should set out education infrastructure requirements for the plan period within an Infrastructure Funding Statement. Where additional need for school places will be generated by housing growth, the statement should identify the anticipated CIL and Section 106 funding towards this infrastructure. The statement should be reviewed annually to report on the amount of funding received via developer contributions and how it has been used, providing transparency to all stakeholders.</p> <p>25. DfE would be particularly interested in responding to any update to the IDP/Infrastructure Funding Statement, viability assessment or other evidence relevant to</p>	<p>The Infrastructure Plan has been updated to reflect further findings and feedback from the Regulation 18 consultation.</p> <p>The IFS and its contents are described in the updated CIL Regulations and it is understood it will take the form of a data standard to be set out by MHCLG.</p> <p>Noted.</p>

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			education which may be used to inform local planning policies and CIL charging schedules. As such, please add DfE to the database for future consultations on relevant plans and proposals.	
REP179/678	Savills on behalf of the Wilky Group	Policies ST1-ST4 and IN1	<p><b>1.0 Introduction</b></p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. It relates to Chapter 8, Infrastructure Provision and chapter 16 Sustainable Transport in the draft Crawley Borough Local Plan, 2019 (DCBLP).</p> <p>1.2 TWG owns about 63.3 ha (149 acres) of land east of Gatwick Airport and north and south of the M23 spur road between Junctions 9 and 9a. The plan at <b>Appendix 1</b> shows the extent of the opportunity in the Gatwick/Crawley/Horley area, including Gatwick Green (59 ha). Wilky and Aberdeen Standard Investments are discussing how they can work together in respect of Wilky's strategic landholding adjacent to Gatwick Airport to bring forward an integrated mixed use development and co-ordinated infrastructure solution. In the adopted Crawley Borough Local Plan 2015 (CBLP), the Wilky land south of the M23 spur road (about 47.3 ha / 117 acres) forms a small part of the land that is 'Safeguarded' for a second runway at Gatwick Airport: TWG's land is required for landside facilities. Consequently, the Council has been unable to allocate the land, and instead has designated it as part of an Area of Search for a Strategic Employment Location (SEL) under adopted Policy EC1 (Sustainable Economic</p>	

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			<p>Growth). The Council intend to select one or more SELs in the event there is no longer a case to safeguard land for the second runway. TWG's landholdings within the Area of Search make it a major stakeholder in relation to the future of the local economy and its continued and sustainable economic growth.</p> <p>1.3 The representation will address the following consultation questions set out in chapters 8 and 16 of the DCBLP:</p> <p><b>General</b></p> <ul style="list-style-type: none"> <li>• In what key ways would you like transport in Crawley to be different in 2035</li> </ul> <p><b>Policy ST1</b></p> <ul style="list-style-type: none"> <li>• Is this policy consistent with national planning policy requirements relating to the promotion of sustainable transport?</li> <li>• Are there requirements or terms within the policy which should be explained more fully, either in the policy or elsewhere?</li> <li>• Are the requirements of the policy justified and appropriate?</li> <li>• Are there additional ways in which the policy can reasonably support sustainable transport?</li> </ul> <p><b>Policy ST3</b></p> <ul style="list-style-type: none"> <li>• Is this policy justified and necessary?</li> <li>• Are there elements of the policy requirements which could be further clarified, either in the policy or elsewhere?</li> <li>• Does the policy accurately describe the roles which each station can and should play within the borough and the wider transport network?</li> </ul> <p><b>Policy ST4</b></p>	

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			<ul style="list-style-type: none"> <li>• Would a Western Relief Road be a benefit to the town?</li> </ul> <p><b>Policy IN1</b></p> <ul style="list-style-type: none"> <li>• 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?</li> <li>• Does this policy need to define more clearly what is meant by 'infrastructure', or is the definition provided in the Glossary sufficient?</li> </ul> <p><b>2.0 Sustainable Transport and Infrastructure</b></p> <p>2.1 TWG welcomes the Sustainability Objectives together with the Policies set out in the Sustainable Transport chapter of the DCBLP. It is recognised that the policies attempt to balance the aspirations for growth and new development with the need to minimise carbon emissions and the impact of travel on climate change and air quality. Crawley has a record of delivering genuine improvements in public transport through Fastway, which has helped achieve a shift from car to bus travel. It is also clear that recent sustainable transport measures proposed and under development as part of the Coast to Capital Growth Fund are an extension of a local commitment to innovation in transport. This includes significant investment in hydrogen powered buses with zero emissions.</p> <p>2.2 The response to the questions posed in the Sustainable Transport chapter, submitted on behalf of TWG are therefore directed at <b>clarifying the means of delivering the policies</b> and facilitating growth whilst minimising its impact on the environment.</p>	

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			<p><b>Policies ST1, ST2, and ST3 and the Key Issues</b>  identified in para 16.5 cover the aspirations of CBC to deliver a vibrant economy, at the same time recognising the urgent need to address climate change. TWG believe that the Government’s Industrial Strategy, including its focus on reducing Greenhouse Emissions alongside improving productivity, and the publication of the Future of Mobility: Urban Strategy (March 2019), provides a useful and constructive context for Crawley’s Sustainable Transport policies.</p> <p>2.3 In committing to new development east of Gatwick Airport, TWG has considered the part that new employment will play in reducing the level of car-borne journeys and the means by which residents and those working in Crawley, travel around the area. This has generated a set of principles and infrastructure concepts which partially address the consultation questions and promotes a vision for Crawley, linking growth with improvements to sustainable transport which, so far as possible, achieve carbon neutral travel. These principles are:</p> <ul style="list-style-type: none"> <li>• To provide a range of high-quality employment opportunities that widen and deepen the skill base of residents in Crawley and its immediate neighbours. This will reduce levels of “out-commuting” and therefore the length of trips. Shorter journeys are made more easily by active modes, walking and cycling and potentially, personal electric transport.</li> <li>• To link new and existing residential development with employment opportunities through infrastructure and transport services that cater for carbon neutral modes of</li> </ul>	

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			<p>travel, potentially reducing reliance on the private car and in line with the concept of Mobility as a Service, (MAAS).</p> <ul style="list-style-type: none"> <li>• To ensure a consistent approach to the delivery of new transport services and infrastructure across borough/county boundaries and to work in partnership with relevant agencies such as the Coast to Capital LEP and Transport for the South East (TfSE).</li> <li>• To achieve a high level of integration between carbon-neutral modes by providing strategically located and high quality interchange facilities (the concept of superhubs is already established in Crawley).</li> <li>• To plan development and sustainable transport comprehensively with new employment and residential locations linked, to avoid “piecemeal” growth which focusses on the exclusive needs of individual sites and occupiers.</li> <li>• To encourage new development that has the scale and value necessary to deliver investment in innovative and carbon neutral transport services and infrastructure.</li> <li>• To establish a multi-modal, comprehensive and flexible Sustainable Transport Strategy which is phased in line with new development. It is recognised that this will include some limited new road links to address gaps in the highway network and provide alternative route choices. These should not be primarily aimed at expanding capacity for private car use, but would assist in providing flexible transport corridors, including priority for low emission vehicles, e.g. hydrogen buses operating on the Fastway network and high occupancy electric transit. Critical to delivering the transport infrastructure will be a clear funding strategy based on a borough-wide model</li> </ul>	



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			<p>that pools available public funding with developer contributions through the CIL or a comprehensive approach to securing planning obligations.</p> <p>2.4 TWG has sought, in discussion with existing transport and network providers, to “operationalise” the principles set out above and thereby to demonstrate that new employment at Gatwick Green would significantly contribute to the simultaneous delivery of growth and a reduction in carbon emissions. The following are examples of measures to address the question defined in the Sustainable Transport chapter of the Draft Local Plan “<i>In what key ways would you like transport in Crawley to be different in 2035</i>”:</p> <ol style="list-style-type: none"> <li>1. A transit service which is consistent and complementary with existing bus routes operated by zero emission vehicles and capable of conversion to a more sophisticated Guideway system and/or light tramway.</li> <li>2. Dedicated infrastructure along newly identified routes which would function as a Flexible Transport Corridor, (FTC) linking development sites with existing interchanges and destinations. These routes would encompass the latest thinking in terms of flexible movement using e-bikes, e-scooters (subject to legislation), and “personal transport” solutions, which will form the basis of movement. Such carbon neutral / low-carbon solutions would help to mitigate the causes of climate change and improve urban air quality, currently a key national objective.</li> <li>3. High quality and strategically located transport interchanges with a focus on sustainable modes. The concept of “super-hubs” is consistent with this aspiration.</li> </ol>	

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			<p>4. New road infrastructure to accommodate all travel modes and to bypass existing congestion hotspots. The principle is to plug gaps rather than significantly expand capacity. In this context, TWG believes that the answer to the consultation question “<i>would a Western Relief Road be a benefit to the town</i>” rests on its capacity to accommodate the full range of transport modes.</p> <p>5. New pedestrian and cycle links utilising existing routes where possible with an emphasis on safety and the protection of vulnerable road users. These may form part of 2 above.</p> <p>2.5 It is important to stress that TWG believes these measures form part of an integrated “whole” with new development contributing to the delivery of the linked network of sustainable travel opportunities. In this regard and to address the questions posed in connection with Policy ST1, the DCBLP <i>is broadly consistent with national planning policy requirements, is justified and appropriate</i>. However, in its current form the policy would benefit from a clearer statement that sustainable growth means growth that delivers a significant shift towards efficient carbon neutral transport arrangements. The policy could therefore more clearly state that growth (residential, retail and employment) must be accompanied by major investment in alternative transport networks and methods. The Policy might additionally define an explicit set of measures to inform stakeholders of the requirements likely to flow from new development along with a definition of the components of a comprehensive, sustainable transport strategy associated with various sites. This would apply to</p>	<p>Policy has been further amended to underscore importance of sustainable modes for large-scale developments (Mobility Strategy requirements). Approach to S106 for sustainable transport set out in Planning Obligations Annex. LCWIP/Transport</p>

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			<p>Gatwick Airport as well as other growth points to ensure an integrated land-use/transport approach.</p> <p>2.6 TWG is broadly supportive of Policy ST3 on Improving Rail Stations, along with the distinctive roles defined for each of the stations. Access to Gatwick Rail Station is currently difficult for those using it as a surface interchange. It is essential that Gatwick is recognised as a station that serves all the community and facilitates access by sustainable modes of surface transport, cycle, pedestrian and bus/transit services.</p> <p>2.7 In response to the Consultation questions relating to Infrastructure Provision in the DCBLP, TWG has a generic observation. Whilst it is recognised that reference is made to the Community Infrastructure Levy (CIL), there is no clear link between the policies defined in the Sustainable Transport chapter and Policy IN1 covering Infrastructure Provision. TWG considers this is likely to be a consequence of the focus on the (historic) distinction between providing new roads to address capacity and Mobility as a Service, with greater focus on the introduction of public transport services, new interchanges and dedicated transport routes for zero emission travel.</p> <p>2.8 It is therefore suggested that in keeping with the Government's Industrial Strategy: Future of Mobility, a more holistic approach is adopted in the DCBLP to ensure a full and comprehensive cross-reference between infrastructure and the future provision of sustainable transport. This would also serve to encourage an integrated approach to the siting of new development and its associated access and transport requirements.</p>	<p>Strategy will also do some of this work.</p> <p>Noted.</p> <p>Planning Obligations Annex has been included to provide clarity about what will be funded by what form of developer contribution.</p>

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			<p>2.9 A comprehensive, employment and residential development strategy, aligned with an integrated approach to travel will play an important part in delivering Local Plan policies. An explicit policy which sets out to encourage development which addresses the challenge of climate change, through contribution to a clear and defined sustainable transport strategy, will serve to strengthen the Plan. This could build on both committed and proposed investment in Crawley, but crucially should see new development as an opportunity to deliver innovative transport solutions and exploit the emerging technologies designed to minimise greenhouse gasses.</p> <p>2.10 In meeting the aspirations of the DCBLP, TWG believes that Gatwick Green is a good example of new development that would achieve economic growth and help to shape a transport system fit for purpose and designed for future generations. Gatwick Green is strategically located at the confluence of several major transport networks, so is uniquely placed in view of its scale and location to deliver modal shift and significant components of the wider sustainable Transport Strategy.</p> <p>2.11 A piecemeal / ad hoc approach will fail to achieve the sustainable transport benefits referenced in this representation. The absence in the DCBLP of a Strategic Employment Location (SEL) and identified housing allocations within/outwith Crawley Borough means there is a risk that the opportunity to achieve highly sustainable transport and travel will not be fully realised. It is crucial the DCBLP defines measures which will achieve a significant shift from travel by private car, especially for trips of less than 5 miles. Such measures need to be</p>	

INFRASTRUCTURE PLAN				
Representor/ Representation Reference	Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>aligned with the proposed development sites in the Local Plan.</p> <p>3.0 Conclusions</p> <p>3.1 This representation sets out a clear manifesto for the range of sustainable transport initiatives and infrastructure that should be part of Crawley's future transport vision, enabled and delivered through well planned growth and development, integrated and aligned with public funding. This vision can only be fully achieved through planning effectively for employment growth east of Gatwick – a strategic opportunity known as Gatwick Green – and residential development within and sustainably located adjacent to the Borough. To achieve these objectives, TWG has put forward the need for a multimodal, comprehensive and flexible Sustainable Transport Strategy, which is phased in line with new development. The soundness of the DCBLP will depend on such a Strategy coming forward alongside any growth proposed. It will, of its nature, need to be a joint strategy with the authorities neighbouring Crawley to ensure funding is secured, apportioned and directed in line with mutually agreed priorities.</p> <p>3.2 In relation to the policies referred to in this representation, TWG has suggested that some of these would benefit from adjustment to clarify their purpose and objectives:</p> <p>Policy ST1</p> <ul style="list-style-type: none"> <li>• A clearer statement that sustainable growth means growth that delivers a significant shift towards efficient carbon neutral transport arrangements.</li> </ul>	<p>We think that the latest draft of the policy responds to the first two bullet points here.</p>

INFRASTRUCTURE PLAN				
Representor/ Representation Reference	Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<ul style="list-style-type: none"> <li>• More clearly state that growth (residential, retail and employment) must be accompanied by major investment in alternative transport networks and methods.</li> <li>• Define an explicit set of measures to inform stakeholders of the requirements likely to flow from new development along with a definition of the components of a comprehensive, Sustainable Transport Strategy associated with various sites.</li> </ul> Policy ST4 <ul style="list-style-type: none"> <li>• Add a reference to its capacity to accommodate the full range of transport modes</li> </ul>	LCWIP and Transport Strategy are being progressed alongside the Local Plan. For Gatwick Green (and other sites currently affected by safeguarding for an additional southern runway) the proposed North of Crawley Area Action Plan will provide a framework for this.
REP185/745	Carter Jonas on behalf of Homes England		<p><b>Draft Infrastructure Plan</b></p> <p>It is noted that the Council is not formally consulting on this document.</p> <p>There are three matters within it which require comment.</p> <p>First, on the section on education (page 13), it is suggested that the opportunity provided by a strategic site in a neighbouring authority could be realised in the medium term. As there is an existing shortfall in education accommodation, this needs to be addressed in the short term (first 1-5 years of the Plan period). Homes England therefore suggests the supporting text should reflect the need for early delivery of education facilities.</p> <p>Second, on the section on road transport, there is no mention of the proposed CWRR (pages 32 and 33). On the basis the CBCLPR proposes to safeguard land for this, full consideration should be given to the CWRR in this section. This would be consistent with Policy ST4.</p> <p>Third, in the section on rail transport (page 30), whilst there is a reference to the business case being examined</p>	<p>The reference to 'in the medium term' has been removed.</p> <p>The Western Link Road and the issues it is proposed to address are now referred to in 'Current Findings', 'Future Studies and Plans' and 'Summary' sections.</p> <p>ST3 does not identify 'scope to upgrade' Ifield Station, but rather scope to 'strengthen its role as a local suburban station meeting the needs of current and future residents in the west of the town' (as amended). This is about requiring developments to</p>

INFRASTRUCTURE PLAN				
Representor/ Representation Reference	Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			for a new station at Kilnwood Vale, the scope to upgrade Ifield Station should be set out consistent with Policy ST3: Improving Rail Stations.	strengthen this role in a proportionate way, and not an identified infrastructure project as such.
REP196/816	Environment Agency		<p><b>Draft Infrastructure Plan</b></p> <p>Page 4 - "significant water stress" - our own terminology is "serious" water stress.</p> <p>Page 5 Water Supply Evidence Base - "Draft Water Resources Management Plan 2020-2070 (to be finalised December 2019)" - The latest document is the "Revised draft Water Resources Management Plan 2019, Addendum to Statement of Response", dated June 2018, and yet to be finalised.</p> <p>Page 5 Water Supply Current Findings - "Southern Water is aiming to increase the number of homes with meters from 92% to 100% in the Sussex north zone by 2025." The compulsory metering programme completes in Sussex North in 2025, when the latest plan forecasts the proportion of metered homes as 92%. 100% is not expected to be achieved. It is impractical to meter the remainder, but new homes, all metered, are expected to drive the figure up to 93% by 2030. In 2018-19, 91% of homes were reported as already metered.</p> <p>Page 5 Water Supply Current Findings - "Southern Water's Asset Management Plan to 2025, identified that its customer base is forecast to grow by 20% during 2020-45" - Would it not be better to reference the Water Resources Management Plan which covers the time period specified, and should be consistent with the Asset Management plan?</p>	<p>Change made.</p> <p>Change made.</p> <p>Change made.</p> <p>Change made.</p>

INFRASTRUCTURE PLAN				
Representor/ Representation Reference	Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>Page 6 Current Findings (10th bullet) "Southern Water's Draft Water Resources Management Plan 2020-2070"- As above, the latest document is the "Revised draft Water Resources Management Plan 2019, Addendum to Statement of Response", dated June 2018, and yet to be finalised.</p> <p>Page 7 Sewage Evidence Base - "Thames Water Draft Water Resources Management Plan 2020-2100 (subject to DEFRA approval)" - The latest document is the "Revised draft Water Resources Management Plan 2019", dated October 2018, but both documents concern supply rather than sewage, so are only indirectly relevant.</p>	<p>Change made.</p> <p>Noted. Change made.</p>
REP196/820	Environment Agency		<p><b>Infrastructure Plan For the Crawley Borough Local Plan 2020-2035</b></p> <p>Page 7, Sewage, Current Findings – <i>“Where capacity off-site is not available, developers should ensure that plans are in place for provision ahead of the development’s occupation”.</i></p> <p>The above statement could be improved by stating that all necessary permits should be applied for early in the development process and all permits granted and the required infrastructure and connections built prior to developments’ occupation.</p> <p>The Infrastructure Plan should be updated once the new Water Cycle Study has been completed as most of the evidence base used for the sewage section of the Infrastructure Plan is outdated.</p>	<p>Amendment made.</p> <p>Noted.</p>



EVIDENCE DOCUMENTS				
Representor/ Representation Reference	Organisation	Evidence Para/ Page No.	Comments	CBC Response
REP179/679	Savills on behalf of the Wilky Group	Employment Land Trajectory	<p><b>1.0 Introduction</b></p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area: a proposal known as Gatwick Green. It relates to the Local Plan Employment Land Trajectory forming part of the evidence base to the draft Crawley Borough Local Plan, 2019 (DCBLP).</p> <p>1.2 TWG owns about 63.3 ha (149 acres) of land east of Gatwick Airport and north and south of the M23 spur road between Junctions 9 and 9a. The plan at <b>Appendix 1</b> shows the extent of the opportunity in the Gatwick/Crawley/Horley area, including Gatwick Green (59 ha). Wilky and Aberdeen Standard Investments are discussing how they can work together in respect of Wilky's strategic landholding adjacent to Gatwick Airport to bring forward an integrated mixed use development and co-ordinated infrastructure solution. In the adopted Crawley Borough Local Plan 2015 (CBLP), the Wilky land south of the M23 spur road (about 47.3 ha / 117 acres) forms a small part of the land that is 'Safeguarded' for a second runway at Gatwick Airport: TWG's land is required for landside facilities. It also falls within an Area of Search for a Strategic Employment Location (SEL) under adopted Policy EC1 (Sustainable Economic Growth). TWG's landholdings within the Area of Search make it a major stakeholder in relation to the future of the local economy and its continued and sustainable economic growth.</p>	Noted.

EVIDENCE DOCUMENTS				
Representor/ Representation Reference	Organisation	Evidence Para/ Page No.	Comments	CBC Response
			<p>1.3 Gatwick Green represents a regionally and nationally significant opportunity for high quality mixed-use economic growth that will solve Crawley Borough's growing deficit of employment land as identified in its employment land evidence base.</p> <p>1.4 This representation will address the five issues identified in the consultation letter from CBC dated 24 July 2019:</p> <ul style="list-style-type: none"> <li>• Suitability of the site for employment development.</li> <li>• Availability or likely availability of the site for employment development.</li> <li>• The economic viability of delivering employment on the site.</li> <li>• The amount of employment development which can be delivered on the site.</li> <li>• The likely time-frame for any employment delivery projected for the site.</li> </ul> <p>1.5 Evidence is put forward to demonstrate that Gatwick Green can be allocated in the DCBLP for strategic employment insofar as it meets the requirements noted above. Consequently, Policy EC1 can be amended to include Gatwick Green as a SEL for high-quality employment and related uses.</p> <p><b>2.0 Policy tests</b></p> <p><b>Suitability</b></p> <p>2.1 Gatwick Green is a highly suitable site for strategic employment. In view of its close proximity and accessibility to Gatwick Airport, it is well suited to bringing forward an 'Airport City' concept to optimise the potential of this strategic location at the confluence of several national transport infrastructure networks –</p>	

EVIDENCE DOCUMENTS				
Representor/ Representation Reference	Organisation	Evidence Para/ Page No.	Comments	CBC Response
			<p>Gatwick Airport, London-Brighton Mainline Rail, the Gatwick Express service, the M23 motorway and the Crawley-Gatwick-Horley Fastway bus service. A Development Area Market Analysis<sup>1</sup> by Savills on behalf of the site promoter sets out the basis for the site's suitability in this regard. No other land near the Airport benefits from this level of accessibility, which in turn offers the potential for a significant levels of sustainable access and modal shift to more sustainable means of transport.</p> <p>2.2 The site is not affected by any significant environmental, physical or heritage constraints and could be developed within the current / future aircraft noise environment and aerodrome safeguarding requirements relating to the Airport. The site is also complementary to Gatwick Airport's growth plans in its Master Plan 2019, including the DCO for the use of the standby runway. In addition, there is a potential third option that allows the Airport to retain safeguarded land for a second runway, whilst still enabling critical economic development east of the Airport on TWG land which can be released from the safeguarded area (the third option is outlined in more detail in TWG's representation on policy GAT2).</p> <p>2.3 Overall, the site is considered to be highly suitable for strategic employment, supported by a detailed market analysis by Savills.</p> <p><b>Availability</b></p> <p>2.4 The plan at <b>Appendix 1</b> shows the extent of the Gatwick Green opportunity (59 ha). TWG controls most of the land and has undertaken significant engagement</p>	

EVIDENCE DOCUMENTS				
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			<p>with the remaining landowners from which understandings have been reached that in the event Gatwick Green is allocated, these remaining land areas would be brought forward for development in a timely and efficient manner such that the whole allocation could be developed in a comprehensive and phased way including enabling infrastructure. The benefits of TWG's substantial ownership should not be underestimated and will aid the delivery of Gatwick Green.</p> <p><b>Site capacity</b>            2.5 A high-level assessment of the land and floorspace potential of the wider 'Airport City' opportunity of 150 ha is contained in Savills' Development Area Market Analysis (Table 37). If the same 'demand based' plot ratios are applied to the Gatwick Green area (59ha), then the site could accommodate up to about 338,704 sqm (3.64M sq ft) of mixed employment floorspace in use classes B1, B2, B8 and C1, including ancillary uses within use classes A1 - A4 and D1.</p> <p>2.6 Whilst the site will be a focus for B class floorspace, it has the benefit given its highly accessible location, of being attractive to a mix of non-B class employment uses. This will help the site to come forward more quickly given its wider appeal to a number of different sectors and investors (delivery partners). It will also enable the site to deliver a greater variety of jobs to help transform and rebalance the economy and benefit the local community.</p> <p><b>Viability</b>            2.7 A high-level assessment of the site's viability based on a revised development concept has been</p>	

<b>EVIDENCE DOCUMENTS</b>				
<b>Representor/ Representation Reference</b>	<b>Organisation</b>	<b>Evidence Para/ Page No.</b>	<b>Comments</b>	<b>CBC Response</b>
			<p>undertaken. The assessment is based on a development capacity of up to 338,704 sqm (3.64M sq ft) of mixed employment floorspace and related uses in use classes B1, B2, B8 and C1, including ancillary uses within use classes A1 - A4 and D1. The assessment has also taken account of the likely floorspace absorption rate based on the Savills demand assessment and an estimate of costs related to providing sustainable transport infrastructure to serve the development.</p> <p>2.8 Based on these inputs, the likely Gross Development Value (GDV) of the proposal has been assessed. Taking account of the development costs (including the cost of acquiring the land), the Gatwick Green project would show a positive Net Present Value (NPV) and an Internal Rate of Return (IRR) that would be attractive to investors/developers. This positive viability profile will enable Gatwick Green, along with contributions from other major developments such as Gatwick Airport, to provide the necessary infrastructure to support the new development. This critical infrastructure will also benefit the wider area and could link up with other major development and infrastructure opportunities.</p> <p>2.9 The future success of Gatwick Green is supported by the success of the nearby Manor Royal employment area. It is the largest employment area in the region by some margin and provides a critical source of Grade A employment floorspace. Gatwick Green will share the same attributes, so making it attractive and deliverable to the market, arguably even more so given that it will clustered around the primary gateway into Gatwick</p>	

EVIDENCE DOCUMENTS				
Representor/ Representation Reference	Organisation	Evidence Para/ Page No.	Comments	CBC Response
			<p>Airport, and lies directly adjacent to the mainline train station and the M23.</p> <p><b>Delivery timeframe</b></p> <p>2.10 The Development Area Market Analysis by Savills contains a high level delivery strategy that demonstrates that Gatwick Green could be developed as a mixed-use proposal that achieves a higher density and a better site optimisation; an appropriate build out rate; parcelled up and phasing to de-risk delivery; benefit from agglomeration, and deliver wider economic benefits.</p> <p>2.11 Based on the build-out and absorption rates in the Market Analysis, it is considered that the market could support a build out over 10 years finishing around 2035.</p> <p><b>3.0 Revised ELR entry</b></p> <p>3.1 Based on the evidence in this representation, a revised entry to the Employment Land Trajectory (ELT) has been prepared, as set out below <i>*see original rep*</i>.</p>	

## Crawley Local Plan 2035 Community Forum Workshop – 5th September 2019

### 1. Wellbeing & Communities

#### 1.1. Is there anything in your local area which you feel affects the health of yourself or the groups that you represent and what would you advise as a solution?

##### Table 1

Being psychologically at ease. Rich heritage in Ifield doesn't suffer much in crime. Some well cited articles in news last year. A visible and active lawful presence is required to make people feel more secure.  
Looking at Gatwick airport expansion, Noise pollution around Manor Royal more congestion on road.  
It is the balance of how we do things not just for now but future all interlinked housing, environment, wellbeing.  
Have to stick to room sizes for apartments (Space standards).  
You want to sit outside in your garden without noise and pollution.  
Any small piece land taken. This all affects communities, retailers have a lot of issues with too much Permitted Development.  
Cost of converting elderly houses is high.  
Does all the above educate people, in schools debates about health these conversations are needed in primary schools, include in education?  
Seen in Tilgate schools families with kids on bikes. Good living standard.  
Planning can be implemented at school policy. Need to have kids at primary and secondary involved in the planning system.  
Dementia - people at home. Secures that independent living. Accountability and old community – cost of converting.  
GP under pressure. Buildings inadequate shortage of GP etc.

##### Table 2

This is very difficult as it is a national issue.  
Awful noise from the M23. Tilgate Park. The so called Peace Garden is not peaceful and the A23 goes right through the centre of it also.  
Road noise is also a big issue with traffic calming which uses speed humps.  
We need to introduce new quieter cars only to reduce the noise and use noise bunds also.  
And speed limits, which could keep noise lower, are not enforced.

#### 1.2. Are there any community facilities missing or needing improvement in Crawley?

##### Table 1

You can make them more accessible, parents asked to work from home more.  
Issue finding a venue to plan and do things, encourage people flexibility and transport issues. Greater scope for people to operate.  
Also issue with abandoning shops, these shops are valuable to the community (neighbourhood parades).  
Social hubs need to be more prominent. Need to improve facilities.  
Venue/park pressure on local shops and rent.

##### Table 2

Noise vehicular noise is a big issue.  
Broadfield centre is thriving – 8am – 10pm, 17 different groups.  
Maidenbower centre is not thriving.  
Community centre attached to a church lots of ready volunteers.  
It's an ecumenical church at Broadfield – but often/most centres are just buildings for hire – with no sense of community. Just a function for booking.  
Broadfield is different.

**1.3. What should be the key infrastructure priorities for supporting the growth which is planned in Crawley for the period 2020-2035?**

Table 1

How are you going to equip places to have more doctors with increased population? When will council say to 'metro bus' when will all your vehicles become electric? Where are cycle ways that link to green spaces?  
Transport – good bus service. Electric busses? Smaller to get into neighbourhoods.  
Cycleway and pathways lacking connectivity.  
Replace boilers in council houses from years.  
Mental health through creative industries.

Table 2

Quality and continuity of bike lanes are very poor.  
Bike lanes are often very broke – so we all use cars.  
Greenways through Crawley – they are often used too much for fly tipping and dumping.

**1.4. What is your view on a western relief road from the A264 to the A23?**

Table 2

Noise encircling the borough – one continual ring road.  
Can good design and tunnelling even be used to deal with this?  
From Horsham, maybe toll car access – half joke.  
Covered in wishful thinking language is the carbon ambition of the council – the rest of the plan is very detailed and specific in comparison to this overarching issue.  
I have faith in future technology.  
Simple basics like very good insulation on buildings – no more poor construction standards.

**1.5. What type of low- and zero-carbon energy sources are most appropriate in Crawley? Would you like to see these introduced?**

Table 1

Solar Panels – wind power reduce energy consumption.  
Electric charging points.  
New innovation solar tiles, in long time cost will be less.  
Create living walls.

**2. Character & Development**

**2.1. What do you think is valuable about areas in Crawley? What don't you like about parts of Crawley?**

Table 1

Broadfield lots of drugs, broken windows.  
Lots of facilitates in Crawley town are still fragmented if we want a Crawley character create a distinct Crawley identity.  
Why hasn't council repaired Broadfield? It's being neglected, there is a distinction between it and Furnace Green. If developing new town there needs to be a solution to the peeled paint and broken windows.  
Not just adding the police.  
It's down to landlords and their development.  
Key in ingenuity and amount of imagination that goes into design. The key is in designing and building with enough individuality.  
Moving onto green walls can we do more? Innovation at the beginning isn't impossible. Spend more time on design, look at the basics, and build with environmental influences at the beginning. Use plants to suck up energy and solar panels.



Town centre needs less, there still will be shops why not focus on other types of uses.

**2.2. Are there any places you think would be improved by change and new development?**

Table 1

Broadfield doesn't feel safe. Broken windows trouble with drugs and high overdoses. Houses in poor state, windows are broken above shops. Need to connect social areas.  
Needed for decades. Well-resourced/high employment/lots of facilities in town is very fragmented.  
Preconception of neighbours Crawley character – distinctive identity rather than disassociated communities.  
More police needed in Broadfield, make the look and environment of Broadfield better and improve private landlords.  
Issues of policing. Nice design is needed – variety and under developing.  
Uniform – need to move away from uniform design.  
Strict guidelines. Don't leave open.  
Modular base – likely to be the future. Fit in well with environment. Tiles over solar panels.  
TC needs rethink – layout not going to survive.

Table 2

Garage's – there's lots of them that could be redeveloped. Broadfield could really be improved.  
Open up the area physically. We need better connectivity.  
The importance of trees. – There are reasons to extend this in part.  
I work as part of the Ifield conservation area (committee?). Trees and open space are such an important part of the conservation character of Ifield.  
Obviously bits - the fire station is a disgrace – please redevelop it.  
Ifield – the squares around the green – some potential there.  
We like the 1950's new town curves.  
(Permitted Development)– Hard to see change. Some schemes look ok in pictures and drawings – but would they look ok in reality?  
And apartment building without wardens, or doorkeepers. Nobody to go to, no real management.

**2.3. What makes higher density areas attractive? Where in Crawley should higher densities be allowed? Are there areas in Crawley which should be protected from higher densities?**

**2.4. What does heritage mean to you?**

Table 2

Heritage - it means, so much to different people.

**2.5. What soft landscape features do you value in Crawley?**

**3. Housing**

**3.1. What type of housing (in terms of tenure and mix) should be prioritised given Crawley's limited housing land supply?**

Table 1

Aspirational housing – skill shortage. Those with higher salary move out of Crawley and take skills with them.  
What is aspirational? 4+ bedroom.  
Few and far between price high.  
Might not want to be next to affordable housing.  
Largest development is around Pease Pottage.  
Homeless – hidden homelessness – sofa surfers. Street homeless different

for each group. Single male very different compared to family separations to rehouse move out of Crawley so also top and tail.  
Get help into housing – assistance with services to get into jobs.  
Go up ladder.  
So still need both co-operational housing and affordable housing. Need 4 bed and housing.  
All developments 1 + 2 beds.  
Transport issues if out of town.  
Empty houses – private landlord level.  
Design bespoke.  
Interact.  
People getting older – skills/leisure/tenure – remain in house.  
Developer low level unteachable.  
Conditions are needed. No bungalows anymore?  
Move people on to open up for family housing. Care homes? Not many want to move into that. Used to be ¾ bedrooms and bungalows gave up ¾ bedroom houses for another family. People want to sleep in their own house, community being part and parcel of housing know who in their local community has to be looked after.  
People on different stages of homeless hidden sofa surfing. Individual situation e.g. young male, carer with 3 kids.  
It's the middle group who are being serviced.  
Homeless have aspirations as well, anyone can be homeless at any point.  
They have skills that had not been challenged. What about empty houses?  
Council need to be putting pressure on landlords and need a code of conduct.  
You need to rethink how you build a house private developers.

Table 2

How do we get to these big numbers needed?  
Affordability for young people. Impossible.  
Even rent is an issue in Crawley for people on a moderate income. Very very difficult for people on housing benefit and needing support.  
Another demographic – the in commute of managers etc., can more not live in the town? Would a wider mix of housing keep the professional classes in the town?  
The poor quality of the town character – it's a self-perpetuating cycle keeping the management demographic away.  
Town is beginning to go a bit more vertical.  
The airport keeps causing population to increase.  
Converting the old buildings – ok. But can town centre have a culture too?  
What does a dense place look like? It's hard to visualise. Need maps to illustrate graphically what the density option looks like.  
The big roundabout at Broadfield just takes up so much wasted space.  
We should use the open unbuilt 'new' spaces to go up really high.

**3.2. Do the following typologies provide a good summary of where Crawley's housing supply is likely to come from during 2020-2035? Are there any others which should be included? What special considerations should we give to support the delivery on housing on each of these?**

***Estate Regeneration/Densification, Infill Opportunities and Small Sites/Surplus Open Spaces/Town Centre Sites/Upward Extensions/Conversions from Commercial/Non-residential Uses/Urban Extensions***

#### 4. Town Centre

##### 4.1. How best can the Local Plan help to ensure Crawley stays a healthy and vibrant town centre?

###### Table 1

The fountain is nice.  
Keep it clean and well maintained.  
Contributions/transport into Town Centre. Walk back to principle – why have Town Centre.

###### Table 2

The fountains work really well but the towns big square was ruined by the big building (The one with the Gym and Iceland).  
Love the coffee shops and fountains outside them.  
There really is a physical disconnection from the retail parks to the historical town centre/High Street.  
And the buses could take you out on the Broadway – as in kill you. It's a speed track. Really need to link those places either side together – Queens Square to the High Street.  
And then connect up to the Retail Park - All agree.  
Those Broadway buses. Very confusing pedestrian crossing – it's a speedway. All agree again.  
Get the buses out of the town centre and calm down the town centre. Make it safe and connect to Retail Park.

##### 4.2. What type of facilities and services are needed to support the town centre residential population?

###### Table 1

Pop ups art galleries for kids and colleges encouraging local artists to come forward, hub for young people, elderly and others to come forward.  
Social community centres?  
Coffee shops?  
Buffering carbon trees? Both could be purchased online.

###### Table 2

We need an inside market building – an all-weather space – all weather.  
Maybe use Morrison's.  
We would love and do love that there are more people in the town centre.  
It would be great I'd say to live in the town centre - to be able to walk to the cinema, the theatre, a late shop – a Tesco Metro late in the evening. If you needed anything you could just pop out.  
Yes agreed.

##### 4.3. What would you like to change about the Town Centre?

###### Table 1

Young people today will be older in 2035 what is their view of shopping?  
Is there scope for building a night time economy? Uses part time ratio? Is it 24 hours?  
Recreation and interaction.  
Encourage independence. Rents pop-ups – art gallery. Hub for colleges.  
Displaying local shops. Hawth theatre should be moved into Town Centre!  
Isolated. Public transport not great.  
Meal and theatre. Night economy Crawley dead for nightlife – not just clubs.  
Need media/outlet/music/film/documentaries. Like Brighton/London.  
Creative/art galleries K2 airside. What should matter and stalls of Town Centre – as much about redevelopment and leisure as it was shopping in past.

Recreational activity and development Town Centre maturing economy not drive in eat and go home. Inappropriate and safe maturing economy. Shops of future? Considerate keep character of areas – High St Residential? Clusters? Balance? Need to use space wisely. Fountain is a good idea. Impressive. Need to maintain it. Chemistry sum, life problems.

Table 2

Culture is needed not cars. We can easily remove all cars from the High Street.

For example and show of better the historic elements.

Out of town centre's like Country Oak's kills the town centre.

**5. Skills**

**5.1. What is your view on the job market and opportunities in Crawley?**

Table 1

Senior management and high paid jobs are limited. Need to be talking to Gatwick, Virgin, Easy Jet here to stay. There are warehouses, Tesco, workers paid minimum wage. Not sustainable.

People doing voluntary work not being acknowledged.

Lots of low skilled people. Companies high skilled – limited Brighton/London.

Too close salaries earn skills more they could earn it Crawley with travel.

Table 2

Isn't improved skills/higher qualifications an issue in Crawley because they can all get jobs? Why bother to upskill? There is a huge supply of jobs, low pay maybe but jobs! So where is the aspiration to try harder?

How to motivate existing community to upskill – afford to upskill with less.

Who could fund this?

**5.2. How best can the planning system better enable people to access local jobs?**

Table 1

Homeless want to get involved in work but the first hurdle is postal address etc.

Got to find a way to present offers to businesses.

Ask Gatwick what is to be done about higher skilled jobs for residents. Ask them to guide smart companies in Manor Royal. Including in the less high skilled market. Warehouses – distinctive. Min wage. How to attract.

It matters getting back into work. Help from schools for those in unemployment (and homeless) need addresses – clothes washing etc.

consider more open houses. Talking to big businesses about plans and where in Crawley they plan to be – what's attractive. PR and media needed to promote. Seminars for low level/skilled workers. People in high paid jobs can help in already established businesses. Help learn skills while young.

**Crawley Local Plan 2035 Developer Forum – 5th September 2019**

**1. Vision**

**1.1. What do you think are Crawley's strengths and weaknesses as a sustainable place?**

Table 1

It was noted that Crawley has the 2nd highest job density nationally outside of Central London.  
Highlighted the poor quality of Crawley Railway Station and environments.  
Gatwick Diamond context; Crawley functions/is in reality the city centre of the diamond.  
It is the key economic driver for the Diamond.  
The aspiration should be to maximise this role.  
Bus network is very good.  
Are we always bold enough?  
Tilgate Park is one of Crawley's big strengths.  
Balcombe road is one a weakness. (Assuming in regard to vehicular movement).  
Motorway junctions/interchange a major issue.  
Geography, Crawley's size and how it can grow and expand is an obvious constraint.

Table 2

Towards transport system of a non-car type that is owner powered. Involves health and wellbeing.  
In TC a lot around station and upper realm to residential. Well connected set up for people to get to work. Change in infrastructure. Footpaths 1.5m wide, need to accommodate electric foot pedal as well as walkways.  
Need to be realistic. Not easy to replace. Can't look at this in isolation where do all the employees come from.  
Slow transition 30,000 people coming in to Crawley, Inter-connectivity between boroughs.  
Do we need to help subsets population in neighbourhoods, there is employment opportunities in sub areas of Crawley however, and involving neighbourhood business opportunities along with digital transformations makes more jobs.  
Need a better sustainability picture.  
Why do we need 40/50 hectares for growth? There is limited land and infrastructure do we need unlimited growth?  
Trying to develop intense business growth.  
Acknowledge time to move High Street to other uses from betting shops and takeaways. State of the art offices, might be radical but might be required.  
No buses go north to south. Brighton to Crawley.  
Neighbourhood principle, transport, lack of land supply.

Table 3

Crawley's strengths as a place include good transport connections and a wide range of jobs.  
At same time Crawley is very car focused – more should be done to promote cycling and walking. This should include dedicated cycling routes.

Table 4

Strengths: very good public access – trains etc.  
Weaknesses: strong focus on car borne travel: New Town legacy – still relates to old rather than modern needs of transport. Certain zones and areas rather than mixed use communities.

Location strength – good for car clubs starting up, likely to be in demand with Manor Royal.

Weakness is the lack of car clubs etc.

Low car parking now should encourage people to get on public transport – bus service is good.

Better cycling – Crawley is a flat area, but the roads are awful for cycling.

Strength – Gatwick and the land around that. International connections are unique to the area. Gatwick is both a strength and a threat – as Gatwick is a strong developer which has forced out other developments that would have come forward. Low level employment, and other higher quality employment would have been attracted to the area.

Natwest – employ a large number of Crawley residents: 50% of staff are from Crawley; 50% commuting in from Kent, South London, Brighton etc.

Parking – need electric charging points and overflow.

Cycling – last 3 miles cycling into Crawley town centre is “hairy”: not cycle lanes. Agreed across table.

Crawley competes with London for staff. Want to be more attractive.

Major strength Crawley has is it is central for Sussex and SE England and as a town has a clear purpose.

## **1.2. What should be the key priorities for making Crawley a more sustainable place?**

Table 1

Protect green spaces.

Agree, protect green spaces.

But also make better use of existing buildings, etc. Prioritise using the stock we have before building more. Referenced the PD project opposite the leisure Plex (Stoner house – contractor went bust).

Do more of those homes above the shops. It can bring in a more vibrant mix. There is a perceived spatial disconnect between the town centre and Manor Royal. That old chestnut, where the two parts of the diamond ‘city centre’ are physically dislocated from one another.

It’s key that the college remains in Crawley. But CCG need the buildings on site to make this happen.

Make use of what we have – Stephenson Way and Spindle Way. These could be very good mixed use opportunities. And a lot of the current functions could be relocated to outside of the centre. Prime mixed use potential.

We don’t take advantage of the airport Crawley more generally – Pursuing higher value businesses in particular. The current mix not right – too many businesses that could be anywhere – how do you attract higher end uses to Crawley. How can planning police play into this?

Table 4

Land use planning can go a long way to join up residential communities with employment areas. Fastway goes some way but still need more cycle ways. Environmental sustainability – policies requiring high quality sustainable schemes. Encourage in policy as much as possible.

Lower skills in area – aspirational homes – limited land. Encourage larger dwellings.

Massive amount of in-commuting. Need to provide more housing. Town centre developments have generally been small schemes – small units/PD – need more Kilnwood Vale style major extensions.

More flexible working – 2 days per week/hours/timings. Employment encouraging. Office developments – allowing for several occupants.

### 1.3. What do you think the health and wellbeing priorities for Crawley should be?

Table 1

All existing provision is great. However facilities are now fully used and need to grow with the town.  
Better and well-lit paths and cycle routes, better links in general for the feeling that it's a safe and secure place.  
GPs are just not available. Need to understand quantum of extra growth needed to get the jump up on doctors and facilities.  
Balance is needed between achieving better place making and delivering increased housing numbers.  
A really high quality environment versus the delivery of affordable housing – balancing viability is key.  
Need to intensify land use so that travel distances/commutes can be reduced as far as possible.

Table 3

At same time Crawley is very car focused – more should be done to promote cycling and walking. This should include dedicated cycling routes.  
Also in terms of health/wellbeing one potential area of improvement is better natural surveillance in parks.  
Housing delivery is threatened by planning delays and risks.  
Employment and housing are interrelated.  
The Vision is quite inward looking, whereas the answers to many of Crawley's problems are outside the borough boundary.  
Early engagement with neighbouring authorities is important (particularly in absence of effective regional planning apparatus) – with likes of Horsham and Reigate and Banstead; also with Wealden on account of their concerns regarding impact of development on Ashdown Forest.

Table 4

Air Quality – critical. Gatwick on doorstep. High level of carbon emissions and greenhouse gases.  
Climate emergency? What is being done to address that?  
If putting housing in, need to put in infrastructure on that to suit.  
Leisure – well served.

## 2. Economic Growth

### 2.1. How best can we plan to meet Crawley's employment floor space needs?

Table 1

Town centre stock, can we not offer upstairs space for employment use?  
How to best make use of space we have? Move the warehousing out into the wider Surrey/Sussex hinterland?  
Road access is all that's needed for warehouses –they can go anywhere.  
Future warehousing will have even greater lack of workers - just robots.  
The arbitrary line drawn around Crawley damages economic growth.  
Is their scope for better conversion of existing stock of warehousing and old grade offices?  
It all comes down to viability. This is because of the quality of stock being looked for.  
How can policy and council itself attract this investment? Better use of article 4 maybe and council to prepare plans, proposals and ideas in advance so to allow Crawley plan for the future needs and growth. As opposed to just letting it happen.

Should protection of the safeguarding land be kept? It effects economic growth no? Or is Gatwick not the golden goose for Crawley and so be careful that we don't kill it.

Table 4

Gatwick safeguarded land covers large amount of land. Gatwick have had the second runway declined. Most of the land is used for car parking only. Allocating more land is one way of meeting Crawley's employment floorspace needs.

Also Manor Royal – flexibility of uses: B1, B1c and B8 – so can use for all, meeting faster turnover of tenant businesses. Employment office buildings can be redeveloped for warehouses. Current approach is generally considered to be flexible enough. Policy EC1 – it is encouraging, this allows for some decrease in floorspace but more efficient and productive use of land. Need to look beyond Crawley – Gatwick Diamond, particularly immediate neighbours – North Horsham commercial; Burgess Hill.

Town Centre – going up: higher density on town hall site.

Offices – commercial ground floors, residential above. Such as on the nightclub site.

Empty basement space – could use as employment shared space.

Need for flexibility – improving quality of vacant offices.

Customer base – packaging/businesses struggling for storage space and not enough parking for demand.

Sheds – temporary so they can be used and taken down quickly in safeguarded land?

South East is short of storage space – products travel up from the ports on the south east coast up to the Midlands to be stored and then are transported back down for delivery. The message from businesses is clear that there is not enough storage.

Parking standards in Crawley is limiting what is able to go on sites – examples in London of higher density would be welcomed.

## **2.2. How can the Local Plan help to better enable local residents to access local jobs?**

Table 1

Get big existing companies to speak to Crawley College.

Problem is the infrastructure. Crawley College's aim is to develop the site and get the stuff (facilities) in place. But we need the right facilities.

Student numbers up in Crawley.

Should section 106's make contributions to skills training?

Great idea.

Balance – ok but ramp it up too and much stuff won't come forward.

Yes get developers to contribute. I know this happened successfully in places like the Wirral.

What we need is an R & D centre linked to local business – as a university is not likely anytime soon. Good example is Bognor Regis outshoot of university of Chichester.

Table 2

How can local skills be supported. Help from developers.

Developments ½ bed flats. Who are these suitable for?

There are opportunities for high skilled people.

No aspirational homes, do people want to live in Crawley. Lack of housing suitable for different types?



Table 4

Policy – skills. Reasonable for construction opportunities to be linked to requirements for local residents. However, this should be a condition rather than being required up front. Brighton policy is linked to S106 or conditions. Apprenticeships – graduates, work experiences, all ad hoc. There isn't a Crawley billboard for 16/18 year olds advertising centrally. Supporting local residents so they are skilled and able to access higher skilled/paid jobs. Crawley College – residents and employers: the college to know what training employers need. It is difficult to know what the Local Plan can do though. Chichester University? Strengthening connections, as a lot of investment has gone in to Chichester and Bognor Campuses, and interest in Crawley due to business opportunities. Linking directly with schools and so better for having a central way. Not Local Plan? Lot of low skilled jobs in Crawley and so link with residents is already good. Need new communities for higher skilled jobs. Residents love Crawley – view of people outside often have a more derogatory opinion. This was considered to perhaps be a New Town issue – but essentially it is a great place to live.

### 3. Gatwick Airport

#### 3.1. Should the Local Plan continue to safeguard land for a future wide-spaced runway at Gatwick Airport?

Table 1

Isn't this a DFT national/policy decision – out of our hands?  
Should it occur that Heathrow does not get expansion, surely we should instead?  
The potential prize of Gatwick getting Heathrow expansion capacity. Surely this is a huge prize for the district?  
Maybe a more nuanced version/creative thinking approach is needed for the safeguarded lands - (referenced the Nestle site, which is to be demolished when/if second runway proceeds.)  
Can safeguarding land be used for temp commercial use?  
There should be a discussion around the potential of the Wilki site.  
Just leaving decision for GOV then it's likely that the land will just be safeguarded – as a default position.  
Maybe approach this only at a more senior national level! The safeguarded land is just going to sit there and wait on the off chance that in 30 years' time something 'may' happen.

Table 2

Safeguard land is it CBC's decision?  
Jury out on Heathrow's third runway.  
Between now and 2035 can anyone say Gatwick won't happen anyway?  
Not if wanting to create additional time.  
Needing to safeguard for the future.

Table 3

There is scope to market Crawley as an employment destination along the lines of Croydon on basis of excellent transport connections.  
Crawley has too much low-quality under-occupied office stock, particularly in the Town Centre. Ideally this should be redeveloped in the form of more attractive premises.  
There should be more planning flexibility in Manor Royal, e.g. through an Area Action Plan? (Or Local Development Orders?) setting out that

development is acceptable subject to certain criteria.

Maybe potential for regeneration on basis of spatial initiatives which fall outside of planning – business rate relief, bidding for High Street support funds (e.g. of this being done successfully in Portsmouth).

Part of the issue re the town centre is that it's not 'bad enough' to warrant more drastic remedial action.

Make the Gatwick expansion safeguarding policy more flexible or take it away altogether, so as to make more productive use of the land.

Don't copy the Croydon approach to seeking to boost skills/employment through S106. This needs to be done in a flexible way. For example, how do requirements regarding construction jobs/apprenticeships work in cases where there is a modular build? Also, some styles of build, materials etc involve more specialist skills/techniques than others. In addition policies requiring quotas of jobs to be reserved for particular groups are discriminatory. Better to pursue this through developing relationships with employers – not clear that the planning system is a good way to do it.

Table 4

Question – what can be used on the land? Policy does allow for some things, but not allowed high value so no contribution towards infrastructure is secured.

Opinion of one member of the table was it should be released.

Alternative view was it shouldn't undermine the future of Gatwick. Don't want to prejudice government national policy so suggested safeguarding until it is not needed and it is clear. Until then allow temporary uses which wouldn't prejudice future runway.

Businesses are flexible and so would be happy to have something for three years.

Gatwick's interest is to make sure they are able to get the land as cheaply as possible. Both financial and process?

Crawley is constrained. There is Horsham and Mid Sussex land but the community and business rates go to Horsham/Mid Sussex with the associated benefits and infrastructure. This land is the only bit left in Crawley. Should be safeguarded by flexible temporary opportunities allowed.

Masterplan Safeguarded area: can't see the point of safeguarding land for unnecessary uses. Car parking. Reconfiguring to make second runway south. Reasonable alternatives? Take the view that if reasonable to assume the second runway could be accommodated on the land currently safeguarding then the council are justified in taking that approach.

Environmentally – climate change problems; still not being met in this country. A second runway would "fly in the face of that".

From a business point of view it would drive wealth in the area. It was considered preferable to get closer to the figures associated with the use of the standby runway, and make use of the land for other needs.

### **3.2. What are the local economic impacts of the growth of the airport, and how can the Local Plan help maximise benefits from them for Crawley?**

Table 1

Better transport connectivity – restraints from connections for jobs and transport connection to homes and to airport.

Improved M23 and new railway station at Gatwick.

One big problem is that Crawley Town Centre is not on the Brighton main line.

Gatwick turns away from Crawley. You would never know Crawley is part of Gatwick. How can we maximise the connectivity.

Does the fastway lane need to be full time in operation? Why not just use it in rush hour as fastway to improve flow?

Gatwick sees its hinterland as the entire South East and South of London in particular.

GAL itself is not a massive employer.

Surely with better construction standards and sealed windows, we can build housing closer to the airport?

Better place making. Make Crawley more attractive for Gatwick workers and they will want to live nearby. No real need for a car then.

There is something about the housing stock divide across the town.

The higher earners are just driving in and out - away from Crawley. As people earn more they move out of Crawley.

The old rumour that all the pilots live in Charlwood!

We need to look at electric infrastructure for the future development. Huge deficit in terms of supply and infrastructure is likely.

Higher density mixed use versus the ambition to get more affluent housing – this is not an easy problem to square. One can negate the other. Especially as Crawley is using limited land.

#### Table 2

What do airports need in the future – they have automatized everything and reduced staff numbers. The fabric of airport is changing. What is needed for the future?

Improving Compatibility with TC, maximise people visiting TC. New hotels.

Drive for expansion so industry can help pay the bills.

Night time economy needs to be a reason for leaving Gatwick airport.

Freight side of GAL traffic/congestion. Business Values. Balance is key between airport and town.

#### Table 3

Make the Gatwick expansion safeguarding policy more flexible or take it away altogether, so as to make more productive use of the land.

There is a lot of under-used employment floorspace at the airport itself which could be made available to a wider range of occupiers.

Expansion of the airport as proposed in the Development Consent Order will create a lot of additional demand for employment and housing land within the vicinity of the airport.

The onus should be on the airport to provide evidence to support their position on safeguarding – otherwise the land should be released for more productive purposes.

Providing more decked parking at the airport will help reduce the land-take required by airport parking.

The restriction of airport parking to the airport is only really sustainable where the car parks are close to the terminals. Otherwise you still have the issue of people needing to be bused around, whether it's on-airport or off-airport, so the restriction doesn't make a lot of sense. Buses could be hydrogen powered hence more sustainable.

The lack of a larger-than-local planning framework in respect of the airport is a problem. One option may be to pursue joint local plans (not necessarily within a combined authority framework), as has been pursued in the South West.

#### Table 4

Maximise floorspace for B1 and B8 uses.

If it can't go here, then may go elsewhere in the region or even internationally – such as Poland?

Employment in the areas creating wealth in the area – Gatwick takes the wealth out of the country – not necessarily a potential growth for area.

## Town Centre

### 3.3. How best can the Local Plan help to ensure Crawley stays a healthy and vibrant town centre?

#### Table 1

It's a chicken and egg situation. Vagrants and street sleeping is an issue. No high end shops really exist. So the area will not improve until these things change.

Town Centre is not really a 'destination' place really is it – unlike Horsham.

#### Table 3

Improvements will happen incrementally to some degree due to relative economic success of the town centre and resulting attraction of investment.

Likely that a wider range of uses will need to be accommodated in future.

The town centre is not attractive in terms of shopping offer and concerns around security. Lack of overlooking in the Memorial Gardens mean that people don't see it as a safe place for much of the time. Town Centre is fragmented, with the High Street being relatively isolated. Various developments look away from it, forming their own communities, rather than relating to it.

Concern that increasing move to residential could have adverse impacts on town centre if not undertaken carefully.

Town Centre would benefit from a more masterplanned approach, looking at how it functions, what works well, and what interventions would improve it.

Some councils have set up their own housing/development companies.

Bournemouth a successful example – others in the South West, although often they don't invest in their own areas.

Lack of council control over the land and limited leeway with property owners is an issue. At the same time the town centre isn't 'bad enough' to warrant major interventions, Compulsory Purchase Order etc.

One approach which has been adopted elsewhere – especially in

Conservation Areas – is combining an Article 4 Direction (for change of use) with a Local Development Order – the idea being that you take the Permitted Development rights away with one hand and give them back with the other subject to certain conditions.

#### Table 4

Single person use in cars very heavy. Especially since 'back to school'.

Making better use of brownfield land. Is happening already – lot being built.

Consent for development around the town centre, but is it the right development coming forward?

Balance around parking – charging points and bus services otherwise people will drive in and park in the surrounding residential areas.

Permitted Development conversions have caused a lot of problems. Some really good schemes and some are shocking and ghettos. Government decision and RTP1 and CBC have written to government but the "horse has bolted". These are not providing open space, affordable housing, cycling or bin storage. Agreement across the table, that these are making other schemes appear more impressive – comparatively!

The Local Plan should set the standards rather than lower to allow development to happen.

Personal electric vehicles such as electric bikes/scooters – can't travel on roads or pavements. CBC should be the first authority to plan new development around such options. It did Fastway – an innovative guided bus

way at the time, so should be thinking about the next innovation.

Employees are not necessarily spending money in Crawley – a resident is more likely to spend money in the town centre. Suggestions of encouraging the evening economy, and encouraging vibrancy in the town centre. This is where the train as a non-car form of transport is important.

There is a lack of places to go to buy lunch and eat in Crawley.

It needs a market.

The new square is good – positive. Really helped.

Policies have to accept the move from retail to online shopping: spread of the town centre Queens Square and County Mall. There is a lot of retail floorspace. Need flexibility in the policy to make sure it doesn't decline.

Charity shop land/furniture – people don't go there.

Leisure offer instead – eating and drinking and night-time leisure: suggest the Broadway could become an extension from what the High Street has already established, and can spread towards the town centre.

There is potential for the council to set the vision and flexible spaces.

Creative workspaces – B Use Classes in town centre rather than just retail due to the move towards online shopping.

Not heard great things about Crawley's nightlife. Diversify the town centre.

Taxis.

Image – from the station, when arriving; how to get to the town centre; improving and creating welcoming town centre links. Acknowledged that these are being proposed.

A lot of towns are struggling with retail in town centres. Flexible occupation – no longer a retail centre, but an entertainment centre. Not to shop – comparison only.

#### **3.4. What type of facilitates and services are needed to support the town centre residential population?**

Table 1

Alternative uses in town centre are needed. All we have is a Prezzo on the old high street at night. Maybe Crawley should invest in better events as Horsham has achieved.

Better flexibility is needed in terms of what occurs in the town centre.

Between High Street to the leisure-plex site connectivity is missing. You don't naturally want to travel south from the retail park as the physical environment does not encourage pedestrians south to the historic high street.

Table 2

Which areas can you sacrifice? To redevelop something. Slicing up a table to make space for what you want to build.

It's the peripheral areas that you can build up.

Masterplan for regenerating around Queens Square.

We need a strong retail centre.

Sustainability of buildings most buildings/shapes of buildings from 1950s/1960s design.

Creative uses in Town Centre. Reduce Town Centre boundary, identify the periphery areas and be more flexible in usage. Stock is old, less sustainable.

What areas would we completely develop through comprehensive town centre masterplan? Out of town retail. Town Centre density. Business rates will be going down.

### 3.5. What would you like to change about the Town Centre?

Table 1

Alternative uses in town centre are needed. All we have is a Prezzo on the old high street at night. Maybe Crawley should invest in better events as Horsham have achieved.

Better flexibility is needed in terms of what occurs in the town centre.

A1 primary use frontage. Are we not holding onto this too rigidly?

Pop up shops – can we promote and help them?

Everyman cinema – better street market.

These are all long term improvement objectives. But can Crawley ever expect to become an ‘everyman cinema’ location?

Crawley’s old high street is disappointing. Horsham has done so much there with the Carfax district.

The Public realm in the high street is now really showing its age.

As is the cheaper housing stock. How can new residents be attracted into the area with this old stock?

Overall warning –the more cost loaded onto development, the more unlikely it is that it will come forward.

Branding the area. How do you make it aspirational to visit & live there?

On a recent visit to the High Street I didn’t feel safe – 8pm on a Sunday.

As soon as people get enough money they move out of the town centre/Crawley.

And yet the location is potentially great – in terms of its links and distance to London, Brighton etc.

Parking – why can council not use quiet roads at night for parking? For example one lane of Crawley Avenue and all the quiet streets surrounding town centre roads at night.

CCTV needs to be improved big time.

At Langley Green (I walk there during lunch sometimes). Here the new town structure really works. Can we not build up these successes and build upon these structures which already work well?

Can we focus on and use the successes of the new town structure to build upon?

How can we incentivise existing housing to be split up in to smaller units to facilitate 2 families and get a better flow of units from the existing housing stock?

Build your own housing ideas.

For new intensive housing, maybe have strict regulations on behaviour and conditions for use and treatment of gardens etc.

North Horsham a good precedent? – Legal and general housing specialist? – How to attract ‘older’ owners and move out of 4/5 bed house. Older residential owners to downsize.

## 4. Housing

### 4.1. What type of housing (in terms of tenure and mix) should be prioritised given Crawley’s limited housing land supply?

Table 1

We need to be careful that in the pursuit of new housing in the town centre we don’t simply move a bigger problem into the town centre – cannot be a dumping ground – especially for Permitted Development residential.

Maybe it’s about tenure – shared ownership for affordability. To address the ‘dumping’ danger there should be a housing mix. Not one type of housing – check and balance viability carefully to achieve best mix.

Build your own housing ideas.

Table 2

Dominance of 1 or 2 bed studies.  
What does the local family want?  
Question is the national housing stock fit for practice?  
Mini town centres neighbourhood hubs – a node which could be built upon.  
Found on neighbourhood centres.  
They (houses\_ are already built how can they be improved?  
CBC can redevelop own council stock.  
A lot can be unlocked in terms of unlocking awareness of proximity to neighbourhood hubs and transport connections.  
Reflect on bringing periphery into town centre which is not 100% safeguarded as residential.  
Has to be needs driven. Not necessarily the developers' interest. 1 bed not viable. Under supply of larger apartments. No supply of larger dwellings, but should there be? Need to give people the option. But a large supply. Owner occupied and rental. Affordable rented. Increasing housing so that it is denser especially at neighbourhood centres. Estate regeneration.

Table 3

One way to release housing for families is to design housing to appeal to downsizers.  
Council becoming too preoccupied with quality of housing. This is leading to sites getting stuck in the planning process, whereas the need is to increase overall delivery.  
Build to Rent – could play a role in Crawley but flexibility needed in some areas to make the investment work. The financing and viability issues are different to a built for sale scheme so there is less capacity to absorb a lot of up-front costs. Also there should be less rigidity in terms of private amenity space where there is communal space. They are not the same as 'co-living' but they are 'co-livingy'.  
Self-build – it's only going to be a minority pursuit and won't make a significant contribution to housing supply. Concerns around financial viability – you effectively 'have to allocate land for free'.  
Should consider co-location of housing and employment. It can work provided the employment uses are of an appropriate nature.  
Planning requirements are constraining developer interest in higher densities because taller buildings have significantly higher build costs, so the viability isn't there.  
Scope for different kinds of residential development catering to older age groups: assisted living, sheltered, age-restricted.  
Need to use discretionary social housing CIL relief to ensure you are not hitting the types of discounted market sale/starter homes.

Table 4

Site led. Need for larger housing for Greenfield sites outside the town centre. Within the town centre should be one and two bed and a person would be nervous for % of 3 bed in town centre. This position was challenged and questioned by another participant in terms of how it fits with 'ghettoization' if only one and two beds are coming forward?  
A housing mix policy for Greenfield sites may not be suitable in the town centre, where the majority of units are going to be small. However, it was agreed it was right to have a target but should be considered on a case-by-case basis. This should not be very prescriptive.  
Need development to have mixed size dwellings of high quality. Should be competing with the London market, as a commuter town to London. High density developments close to the station particularly, Three Bridges as this is

a major interchange. High value properties of standards better than able to achieve in London and better than Crawley currently has. This would bring money into the town centre. Examples offered included Woking and Basingstoke. Needs to be different kind of housing – housing for younger people – will also bring in retail and entertainment.  
Stevenage – adopted Plan, requires larger homes as a proportion of larger Greenfield sites, drawn from demographic needs.

**4.2. Do the following typologies provide a good summary of where Crawley’s housing supply is likely to come form during 2020-2035? *Estate Regeneration/Densification, infill Opportunities and Small Sites/Surplus Open Spaces/Town Centre Sites/Upward Extensions/Conversions from Commercial or Non Residential Uses/Urban Extensions.***

Table 1

For new intensive housing, maybe have strict regulations on behaviour and conditions for use and treatment of gardens etc.  
North Horsham a good precedent? – Legal and general housing specialist? – How to attract ‘older’ owners and move out of 4/5 bed house. Older resi owners to downsize.  
Finding these sites is interesting. But it’s an overall mix of all typologies that is needed. E.g. urban extensions, high/low density to get a balanced level of growth.  
Also to have a diverse offer or mix of typologies.  
How can we incentivise existing housing to be split up into smaller units to facilitate 2 families and get a better flow of units from the existing housing stock?

Table 4

Neighbourhoods – don’t know which one you’re in? Easy to get lost around. A character issues – New Town, car-led, with large swaths of verges and the backs of housing. Not an efficient use of land. Environment for the car. Need to accept redevelopment of areas. Agreed it would be difficult to accept redevelopment due to ownership of properties but there is nothing worthy of keeping.  
Ifield – Rusper: appeal site: considered to ‘work’. 3 and 4 bed shortage.  
Kilnwood Vale has a mix.  
Town centre pocket living – micro flats tied to residents working in the borough. London examples – “not great” accommodation but does work.  
However, it was acknowledged that when house hunting – people are looking for 3 and 4 bed family accommodation with gardens.  
Greenfield sites.  
Land around railway stations. Often have left over swaths of land. Could focus high quality, very accessible apartments and flats.  
Challenging housing need – no stone unturned. Town centre high density and high quality.  
Build to Rent – massive growth area.



## 5. Viability

### 5.1. The following requirements may have viability implications, and as such are being considered as part of the Viability Assessment: *Sustainable Construction/Affordable Housing/Space and Accessibility Standards/Skills Contribution/Brownfield Land/Biodiversity Net Gain/S105 and CIL. Are there any other things which should be included in the viability Assessment?*

Table 1

Renewals – A waste digestion plant? Understanding future IT requirements and future infrastructure for increased electrical power demands. But providing for these upfront as part of new development adds significant extra cost to new development.

Can viability also be about ensuring people can get a school place or a doctor.

Business viability, do developers have to take business into account? All these aspirations add to cost – so development may just not come forward. For example: the Biodiversity and net gain 10% will/could have a significant negative effect on viability due to associated costs.

There could be a lag in development coming forward – while cost of land is re-evaluated to reflect additional development costs/conditions. Current land cost would not take these factors into account and therefore be overvalued. It can take time for owners to lower their valuation expectations.

Value and aspiration of the vision versus viability and getting stuff to come forward. A more nuanced approach to viability is needed. CBC needs to have this discussion in advance of development negotiations. Being pragmatic in advance.

Green Corridor's? – Cycling and walking - surely we can do so so much more.

Has CBC any power over the landlords which own empty units?

Table 2

Impact would be difference between running programme and training programme.

Acknowledging need to invest in staff.

Ultimately down to money.

Ideally a tiered approach to contributions.

Would involve changing law. Under S106 & CIL what is under it?

About Morrison's if closed existing use value...viability. The ability for them to continue paying the rent.

Skills contribution: link up to college, regenerate collage. Not programme.

It takes money off developers it improves on value. Small sites not viable it's more sought. Cycle infrastructure contributions - Be flexible on what it is used for.

Table 3

Due to the new CIL Regulations enabling CIL and S106 to be used for the same projects, developers are exposed to a risk of being asked for S106 money for things which are already eligible for CIL, e.g. Education, who have had their funding cut on the basis that they can seek funds in the form of developer contributions. This means that existing viability evidence on impact of developer contributions is out of date. This should be factored into viability assessments and the local plan viability study.

Seeking affordable housing contributions on small sites down to 1 dwelling is problematic from a viability point of view. Will this be factored into the viability study for the local plan?

Replacement tree contributions are problematic in terms of viability and are

hurting provision of affordable housing on market-led schemes. Are there better ways of achieving biodiversity benefits/net gain, e.g. offsetting towards biodiversity schemes.  
Concerns as to how realistic it is to do the viability at the plan-making stage.

Table 4

Government Industrial Strategy reduction in Greenhouse Gases. Recognition to spend money to achieve reduction in greenhouse emissions. Travel to and from without increasing: EV/bus/public transport/cycle/walking. Contribute to a single requirement over and above policy expectations?  
Carbon neutral heating systems? Zero emission house. Consuming own smoke.  
Healthy communities – not in list, so should consider in more detail.  
Affordable housing – no affordable housing provision due to viability. Arora example, due to other costs? Land values? Change in national policy does help.  
What is affordable housing? It was explained by another participant that this is set nationally. It was also recognised that housing associations now often are more like house builders and build for the open market as well, so not really affordable.

**5.2. The viability Assessment will follow the requirements set out in the Planning Practice Guidance – is there anything bespoke to Crawley which should be considered as well?**

**6. Infrastructure**

**6.1. What should be the key infrastructure (general and social) priorities for supporting the growth which is planned in Crawley for the period 2020-2035?**

Table 1

Sustainable modes of transport – cycling, walking and public transport. The roads are too congested.  
Better bus priority routes.  
Improve the feel of the place - safety – increase CCTV lightly etc.  
Make the design of new places so much better than what was built in the past  
Yes – agreed. And no more new areas with ‘dark hidden corners’  
Well keep doing more of what you’re already doing CBC ... in relation to the improvements to the public realm ...more please...continue.  
Health infrastructure for residents.  
K2 will need to grow and expand with new provision also separately in the neighbourhoods.  
Cherry Lane and Furnace Green Centres – can they be used for more than just for kids activities? Can some of the K2 activities, club’s take place in these locations?

Table 2

Not envisioning in 2035, envisioning now and making tangible steps, lack of conversation at the start is a hindrance. Electric and pedal cycle ways.  
The infrastructure is there to facilitate car travel.  
A lot of demand for car travel trying to encourage a modal shift.

Table 3

Transport infrastructure is key concern.  
A lot of the key pinch-points transport-wise are outside Crawley – e.g. East Grinstead.  
There are various problems with district heating: lack of certainty/clarity over service standards, timings, costs. S106 obligations requiring people to

connect can be onerous in cases of speculative developments where developer/landowner is trying to attract occupiers at the same time. Some cycling paths improvements have not been implemented well. E.g. in Forge Wood the separation between cycle route and road is not clear. There is a lack of clarity for developers as to how the contributions they make are linked to infrastructure provision relevant to their development.

Table 4

Have a clear strategy. Crawley Fastway: private and public sector funding. Hydrogen buses/zero emission buses. No real transport plan for the area – just bit that WSCC have committed to upgrading. Also applies to other infrastructure. Need for coordination – no single infrastructure provider can do it. It has to be the council, as it's unlikely that the county council will have the resources to do it either. Mobility needs to be at the centre. Flexibility for new infrastructure and technology – must be open to whatever is happening. Manor Royal – High Street area, channel and put in mega fast cables and electric charge points. Will attract workers in. Speed of network to tap in and for businesses to adapt. Could seek contributions from businesses – council can't afford to do it but could coordinate. Manor Royal was raised as an example where businesses contribution towards a better vision.

**6.2. What is your view on a western relief road from the A264 at Kilnwood Vale to the A23 at County Oak?**

Table 1

Really needed. With north Horsham coming forward. A new dual carriageway. What about the connection to this relief road from the M23. The connections to the M23 are currently backed up in the mornings? Modal Shift? Better bike route needed between Horsham and Crawley. It's a shame to destroy the tranquillity of West of Ifield with a new highway.

Table 2

Without 10,000 homes in West Ifield we do not need the relief road. Is there room to shift Gatwick safeguard boundary? It is needed if West of Ifield happens? Rat runs through Rusper are bad. Although countryside and ribbon development. Improve existing.

Table 3

Western relief road should be routed to connect to the airport perimeter road rather than linking to the A23. This would require less land.

Table 4

Instead of looking at transport as a problem, consider it as its ability as a service. Not just the capacity of roads – look at other ways of moving around. Cycling – Crawley is mostly flat and the climate is good, but virtually no protected cycle routes in Crawley. A link road is valid, but not fall into trap of old-fashioned bypass. Still need movement east/westwards. Can't make it viable on just the golf course development – needs the 10,000 Homes England/HDC decision. Western Relief Road – old fashioned planning. Change minds – rail service?

Create a place for the future not 20/30 planning years ago. Put bus lands on the Western Relief Road not just for single use cars.

**6.3. What types of low- and zero-carbon energy sources are most appropriate in Crawley? Would you like to see these introduced?**

Table 1

Maybe put a load of PV temporarily on the safeguarded land.  
Introduce battery storage provision for such sustainability generated power.  
Controversial but maybe a Waste to energy incinerator plant?  
Consider the next stage of electric: attempt to future proof.  
Battery capacity improvement will likely be the future.  
The guided bus lanes look a bit decrepit and only partially connect. Any scope to improve?

Table 2

Solar panels obvious choice for low carbon.  
Solar panels are an issue with Gatwick as they are an issue somewhat for pilots.  
Changing to electric cars. Extension of soft/hydrogen buses out of Crawley.  
Bus stops – real time info –buses are unlikely. Worth Way – monorail/light railway. Traffic clients. No traffic lights – reduced light pollution would be a positive. Manor Royal – how to encourage people not to drive e.g. through Park and Ride.

Table 4

District Heat Energy Networks in town centre already coming forward – promoting the way forward.  
Photovoltaics and solar water.  
Energy hierarchy – determine what is suitable for each site.  
Brighton University – Green Growth Programme. Pilot scheme – linking up with Brighton University might be an idea.  
Spotting innovative links with universities and academic institutions.

# Social Media Responses to Reg 18 Local Plan Review Crawley 2020 - 2035

Facebook

Tuesday 16 July 2019



**Crawley**

## Help plan the future of your town

CRAWLEY BOROUGH COUNCIL TUESDAY 16 JULY 2019 2 MINUTES

Planning affects us all. The homes we live in, the places where 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.

The way that the whole town develops in the future will be affected by planning. Crawley Borough Council has started work on a review of its local plan that will help to guide development in Crawley over 15 years from 2020-2035.

This draft local plan review follows a review of the existing adopted local plan; it doesn't start from a blank page. In many cases, the principles and policies in the local plan remain up-to-date and 'sound'.

However, there is a greater emphasis on a number of policy areas, including health and wellbeing, higher environmental standards for new houses and housing to meet a wider range of needs.

It is important that local people, groups and organisations are able to put across their views and participate in the way that we plan the future of the town.

From now until 16 September we are asking you to let us know what you feel are the most important issues for Crawley that will need to be planned for over the next 15 years.

The staffed consultation events take place at:

- County Mall on Saturday 27 July from 10.30am-4pm
- Town Hall on Monday 29 July from 10.30am-4pm
- K2 Crawley on Monday 5 August from 3-8pm
- Crawley Library on Tuesday 6 August from 5-6pm
- County Mall on Saturday 17 August from 10.30am-4pm
- Town Hall on Monday 19 August from 10.30am-4pm
- Crawley Library on Monday 9 September from 5-6.30pm.

Councillor Peter Smith Cabinet member for Planning and Economic Development, said:  
"Anyone interested in the future of Crawley should get involved in this consultation.

"The local plan review is all about finding out what you want to see the town look like. We'll be asking questions at events and online to get your feedback. Please take your chance to shape the future of your town."

For more information visit [crawley.gov.uk/crawley2035](http://crawley.gov.uk/crawley2035) or email [forward\\_plans@crawley.gov.uk](mailto:forward_plans@crawley.gov.uk)

Tuesday 13 August 2019

Crawley Borough Council

13 August · 6

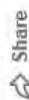
Do you want to have your say on what the town looks like over the next 15 years?

You can do just that by completing our online survey before Monday 16 September: <http://ow.ly/3RN950wC7V>



4

15 comments 9 shares



All comments ▾

██████████ Proud to live in my home town and have fed back on the consultation. Love the revamped Queens Square looks modern and do much nicer than before x

7w

██████████ imagine there will be some sort of tent city set up in queens square soon the way it's going.

7w

██████████ I suppose it will be another shade of grey like the town centre and even more depressing with no flower displays and more drunks and druggies living in the memorial gardens. Born and lived in Crawley all my life coming up to 50 years and ive never seen it look so bad with rough sleepers, beggars and drunks sitting in most doorways. The centre is grey, dull and depressing and looks dirty already. Such a shame as the town always looked pretty.

██████████ Lets face it the town centre looks like the set from Man from U.N.C.L.E. Dreary, depressing and old. Needs a total revamp.

7w · Edited

██████████ I left and won't be coming back

7w

██████████ It already reminds me of Croydon, so I don't think anything we say will stop it from being/looking like Croydon

8w

██████████ I would agree with that comment 🙄 Crawley looks like Croydon or worse. Typical Labour run STJ PJT!! I was born in Crawley & unfortunately still live here 🙄

7w

██████████ agreed, it is an awful town these days!

7w

██████████ Most of the changes have made it more like London ie the concrete block in queens square 🙄

7w

██████████ Lol let's get 2019 done first #Brexit

7w · Edited

██████████ Get rid of the druggies & pissheads 1st, place has gone a dump

7w

██████████ agree, dirty druggies are all over the town.

Spend some money on the homeless, we should pride ourselves on helping the homeless in our town.

Sad to say how downhill it's gone in last 10 years

7w

██████████ 30 yrs I been here, but lot local women/kids won't go broadfield shops as to many wasters? it's wrong.

7w

██████████ council ain't a clue & the police do nothing about drinkers/spice heads walking round. I just push em out way but different for women & kids

7w

Friday 16 August 2019



Help us with the future of Crawley by giving your views on our Draft Local Plan 2020-2035.

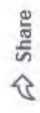
Tell us the most important issues that will need to be planned for over the next 15 years on our online survey before 16 September.  
<http://ow.ly/EIHV50wEUA>

**Economic growth and social mobility**  
Additional jobs will have been created for people living in and around Crawley 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. Sustainable growth of Gatwick Airport will continue to support the economic growth of the town.

- 95,000 jobs
- 3,400 new jobs in Crawley
- 30,000+ new jobs in the South East
- 240 new jobs in the health and care sector
- £49m in new investment
- 32.85% increase in growth
- 9.27.8% increase in growth

**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**

2 comments 4 shares



All comments

just expand Gatwick then everything will come with it

STOP building on the fields !! & STOP building flats !!!

Monday 19 August 2019



Help decide on Crawley's key priorities by completing our Local Plan survey by Monday 16 September: <https://www.snapsurveys.com/wh/s.asp?k=156318646847>

**Crawley 2035**

1 Like Comment Share

Thursday 22 August 2019



Over the next 15 years, we want to make Crawley more sustainable, economical and enjoyable, help us to do that by sharing your views on our Draft Local Plan 2035.

Fill in the survey before Monday 16 September.  
<https://www.snapsurveys.com/wh/s.asp?k=156318848847>

**Environmental Sustainability**

Air, noise and water pollution will be reduced. The borough will prepare for the increasing effects of climate change, through adoption measures including lower water usage standards and delivering a net gain in biodiversity, including through pollution and connectivity measures, to address and mitigate against losses.

**The facts and figures**

- 4,497 trees
- 111,700 10 per cent tree planting projects to be planted by 2035
- 83.3% of the population are environmentally friendly
- 58 per cent of our 115 per cent worth of trees are environmentally friendly
- £2.5 per cent of our income is spent on tree planting
- £4.4 million spent on tree planting in 2018
- £1.5 million spent on tree planting in 2019
- £1.5 million spent on tree planting in 2020
- £1.5 million spent on tree planting in 2021
- £1.5 million spent on tree planting in 2022
- £1.5 million spent on tree planting in 2023
- £1.5 million spent on tree planting in 2024
- £1.5 million spent on tree planting in 2025
- £1.5 million spent on tree planting in 2026
- £1.5 million spent on tree planting in 2027
- £1.5 million spent on tree planting in 2028
- £1.5 million spent on tree planting in 2029
- £1.5 million spent on tree planting in 2030

11 comments 4 shares

Like Comment Share

All comments

Brilliant - It is essential for Crawley to become more sustainable and in fact a few more trees; a clearly differentiated cycle network and a Crawley Residents Sustainability Forum would be great

Seriously... The post below this in my timeline is about destroying parkland and trees so a bus can save a hundred yards between Bewbush and kinwood vale. I have absolutely no confidence in the our council and their integrity.

It's all propaganda.

that new route will improve infrastructure and reduce traffic

I agree with comments above about over development.

One of the biggest actionable change would be to reduce nappies and wipes going to landfill and to instead promote and educate on the use of reusables. Making the switch can have a huge impact. Even if each household reduced 1 disposable nappy a day, that is still 365 a year. Lots of councils offer incentives, nappy libraries or starter kits. The days of Terry towelling are gone and have been modernised to simplify and be more versatile. Better for the environment, money saving and they can look super cute. I would be very happy to discuss further. If anyone reading this would like more info, please feel free to join a local group I have started Crawley Eco Bum mums (cloth nappies) we now have a local library too Horsham Cloth Nappy Library

New, better cycle lanes with plenty of safe space for all users using the roads

Planting more trees to clean the air and more insect friendly plants on unused grass verges

Uber to use tandems?

So why do you need to build stupid flats on the field near me. Children are playing on it all the time

why do they need to build at all... Morrisons will be empty too soon. Plenty of space for flats or will it just be left like so many other buildings do in our failing town.



Saturday 31 August 2019

Crawley Borough Council  
31 August

Tell us what type housing should be prioritised over the next 15 years in our Local Plan survey: <https://www.snapsurveys.com/wh/s.asp?k=156318848847>

**Housing delivery**

By 2035, about 4,800 new homes will have been built to support the needs of the growing population. Crawley's Local Plan sets out the principles and town's unique development and design principles and preserve the most valued of the town's environmental features.

**The facts and figures**

- Some 4,800 new homes will have been built to support the needs of the growing population.
- There is land for 4,800 new homes.
- Home to 10,770 people.
- Home to 11,200 jobs.
- Home to 3,000 businesses.
- Home to 214,831 people.
- Home to 55 primary schools.
- Home to 11,200 jobs.
- Home to 3,000 businesses.

**A mix of new homes will be designed for residents in all stages of life**

10 comments · 4 shares

Like Comment Share

All comments

... a few bungalows for elderly or maisonettes with stair lifts adaptable housing so they can still have garden to pttter around

... I love the idea of new one but I think everone that in old casual house need to have there re built or have there renew so like new room kitchens and everthink else like most of are street need new roads and pathments in bubush

... Tell me why I had an unsolicited call to a number that

... Forge Wood, Kilnwood Vale, next 600 homes on the former pease pottage carboot site and word of moka club being demolished for flats (none of the flats on affordable housing scheme). Surely we ticked our quota ages ago?!!

6W Edited

... Two of those are not in

Crawley

6W

Wednesday 28 August 2019

Crawley Borough Council  
28 August

We've created a Draft Local Plan for 2020-2035 and need your thoughts on it! Complete our online survey before Monday 16 September. <https://www.snapsurveys.com/wh/s.asp?k=156318848847>

**Wellbeing and communities**

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. All people who live here will be proud, confident and resilient, working together and with others for the good of the town.

**The facts and figures**

- 105 years of Crawley
- 33 public parks
- 92 bus routes
- 20-30 new jobs
- 95 primary schools
- 76 for children
- 11 leisure centres

**Crawley is a place that people want to visit, to have fun and spend their leisure time**

2 shares

1

in old casual house need to have there re built or have there renew so like new room kitchens and everthink else like most of are street need new roads and pathments in bubush 🙄

5w

Tell me why I had an unsolicited call to a number that is registered with the telephone preference service from a survey company acting on your behalf last week.

5w

Crawley Borough Council

5w

Crawley Borough Council Hi [redacted] we've asked the survey company and have received the following response.

The telephone numbers are sourced through a process known as 'Random Digit Dialling', a widely used technique in the market research industry to ensure all households with a landline have the same and equal chance of being selected for interview.

We start off with a 'seed' number and then generate all possible number permutations, remove known business numbers and then randomise the database. This ensures that all numbers have the same and equal chance of being selected for interview.

There is no legal requirement to screen against the TPS (Telephone Preference Service) database; market research is not classified as unsolicited sales and marketing.

This method intentionally allows us to reach TPS registered numbers and ex-directory households so that each of these sections of society are included in the consultation process. TPS registered numbers and ex-directory households each exhibit a different demographic profile compared to the rest of the population, and excluding them would potentially skew the survey results.

I hope this helps.

5w

Crawley Borough Council Thanks for the reply. It may well not be a legal requirement to filter TPS numbers out, but not doing so doesn't generate good will. There is a reason why people register with the TPS and that is generally a desire to not be disturbed by unwanted and unsolicited

4w

Larger flats 3 or 4 beds

5w

Himm I recognise them houses 🙄

5w

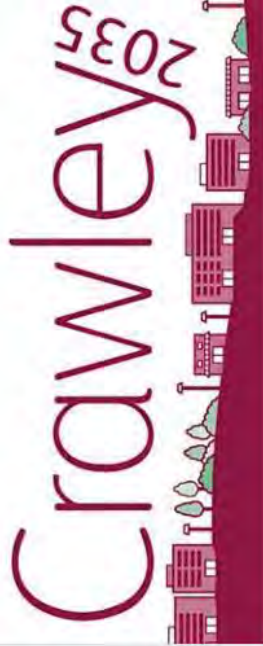
5w

Wednesday 4 September 2019

Crawley Borough Council

4 September

Give your views on sustainability, wellbeing, infrastructure, housing, culture and economic growth in Crawley by completing our Local Plan survey before 16 September: <https://www.snapsurveys.com/wh/s.asp?k=156318848847>



1

1 comment 2 shares

Like

Comment

Share

All comments

4w

Sunday 8 September 2019



**Crawley Borough Council**  
8 September at 08:30 · 🌐

We want to know Crawley's strengths and weaknesses so we can make changes for the better over the next 15 years.

Help us do that by completing our online survey before 5.30pm on Monday 16 September. <https://www.snapsurveys.com/wh/s.asp?k=156318848847>

### Economic growth and social mobility

Additional jobs will have been created for people living in and around Crawley 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. Sustainable growth of Gatwick Airport will continue to support the economic growth of the town.



Redeveloping and revitalising the town centre and further regeneration of the Manor Royal Business District will make to do business in the south east



5 comments 8 shares

👍 Like    💬 Comment    ➦ Share

All comments ▾

Positives for crawley over the years have been the additions of -

- Outdoor cinema events
- Wordfest
- Events at Tilgate - Goffspark

4w

Crawley Borough Council Thanks

I think the question that isn't asked is "why should Crawley council focus on growing bigger?" Crawley basically does everything so so. Its always focused on 'new development's or improving business opportunities. But in the process of doing so has given landlords the opportunity to raise rents for current business' and residents. Pricing shops out of town in favour of coffee shop number 13+ or Vape store. Where are the quirky fashion places or new start ups?? I spouse at least we finally got a comic book shop again.

Taxes have gone up, to cover new developments but have services been improved or have they basically been middling neither good or bad, but kinda okay-ish.

Crime has gone up in recent years. In town center alone shops are regularly being hit up by organised groups or individuals. But hey if its not over £500 the police won't even chase let alone prosecute a shoplifter 🙄 nice one.

All the while town center is full of empty offices and buildings. Sure its improved a little, but it's not like its a bustling hub of office workers or creative professionals. But hey we got a water feature thats cheaper to take your kids to on a sunny day than the local pool right 🤔

Almost no opportunities to grow arts in crawley and it shows. Bottom 33% in the country.


Crawley town, all buisness, no soul.  
4w Edited

Crawley Borough Council Thanks The council doesn't own any retail premises in the town centre so can't control rents. However, the vacancy rate in the town centre is lower than the national average and continues to fall. Town centres are changing and moving more towards leisure.  
4w

True is low at the moment but its going to change again seeing a morrison's may be closing too. (Hopefully not, but its already been announced)  
4w

Tuesday 10 September 2019

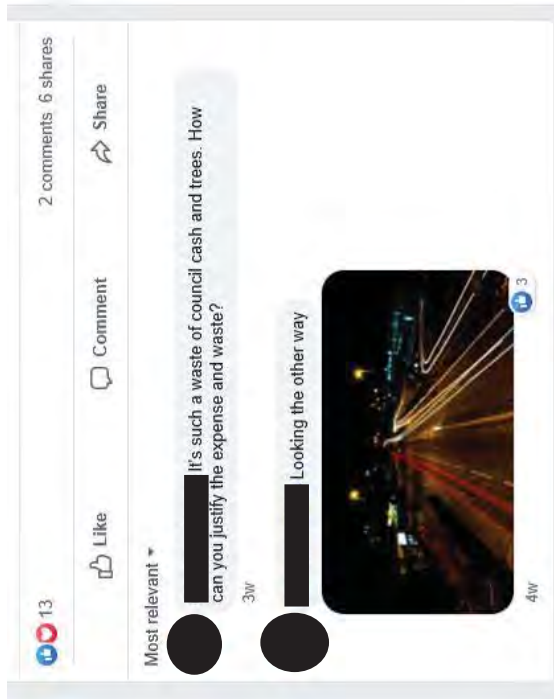
 Crawley Borough Council

10 September at 01:48 · 

The autumn issue of Crawley Live will be coming through your letterboxes this week.

You can read all about Crawley 2035 – the local plan review, Gatwick's plans for a second runway and opportunities for small businesses.

Plus find out what's on in the town to keep the family entertained during half term. There's also a chance to win a session at K2 Crawley's Atlantis inflatable assault course for a family of four!... See more



Friday 13 September 2019



Crawley needs you! We've created a Draft Local Plan for 2020-2035 and we need your views on it.

Fill out our online survey before 5.30pm on Monday 16 September to have your say on how town looks over the next 15 years:  
<https://www.snapsurveys.com/wh/s.asp?k=156318848847>

**Housing delivery**

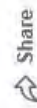
By 2035, about 4,800 new homes will have been built to support the needs of the growing population. These will be built in locations which respect the town's unique development and design principles and preserve the most valued of the town's environmental features.

**The facts and figures**

- Strong adoption of the Local Plan: 65 per cent of new homes built with Crawley Borough Council were affordable
- 55% of new homes will be affordable
- There is land for 4,800 new homes
- HOME SOLID: 10,750 new homes
- Crawley's growing population needs 11,200 new homes between 2020-2035
- Need for 632 new homes per year, of which 156 are affordable
- 214,831 people live in Crawley
- 3,000 new jobs created

A mix of new homes will be designed for residents in all stages of life

4



Monday 16 September 2019



Help us with Crawley's future by having your say on our Draft Local Plan 2035.

Tell us the most important issues that will need to be planned for over the next 15 years on our online survey before 5.30pm today:  
<https://www.snapsurveys.com/wh/s.asp?k=156318848847>

2


2 shares

Like Comment Share

Twitter Responses  
Tuesday 16 July 2019

**Crawley Council** @crawleycbc

Help shape the future of your town by taking part in our draft local plan review [crawley.gov.uk/pw/News\\_and\\_Ev...](http://crawley.gov.uk/pw/News_and_Ev...) #Crawley2035



5:36 am - 16 Jul 2019  
2 Retweets 1 Like

Friday 16 August 2019

**Crawley Council** @crawleycbc

Help us with the future of Crawley by giving your views on our Draft Local Plan 2020-2035.

Tell us the most important issues that will need to be planned for over the next 15 years on our online survey before 16 September: [ow.ly/tuKf50wvEUz](http://ow.ly/tuKf50wvEUz)



8:30 am - 16 Aug 2019  
3 Retweets 4 Likes

Tuesday 13 August 2019

**Crawley Council** @crawleycbc

Do you want to have your say on what the town looks like over the next 15 years?

You can do just that by completing our online survey before Monday 16 September: [ow.ly/H2UO50wvC7w](http://ow.ly/H2UO50wvC7w)



3:30 am - 13 Aug 2019  
4 Retweets

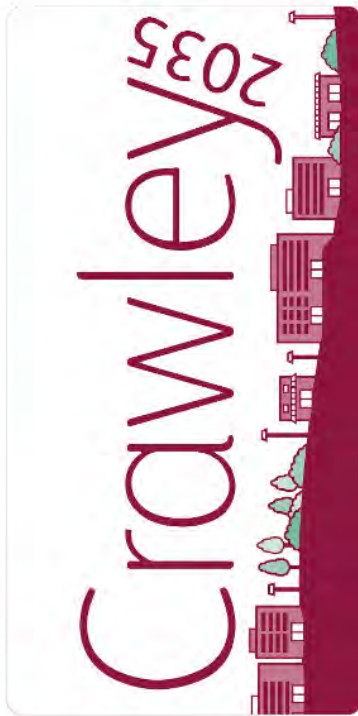
Monday 19 August 2019



Crawley Council @crawleybc

Follow

Help decide on Crawley's key priorities by completing our Local Plan survey by Monday 16 September: [snapsurveys.com/wh/s.asp](https://snapsurveys.com/wh/s.asp)? **k=156...**



2:30 am - 19 Aug 2019

1 Retweet



1



Wednesday 28 August 2019



Crawley Council @crawleybc

Follow

We've created a Draft Local Plan for 2020-2035 and need your thoughts on it!

Complete our online survey before Monday 16 September: [snapsurveys.com/wh/s.asp](https://snapsurveys.com/wh/s.asp)? **k=156...**

**Wellbeing and communities**

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. All people who live here will be proud, confident and self-reliant, working together and with others for the good of the town.

**The facts and figures**

- There are **105** wards in the town
- Some historic parts of Crawley have higher densities of **95** dwellings per hectare
- 33** public parks and green spaces
- 76** primary schools
- 92** primary schools
- 20** secondary schools
- 11** comprehensive schools
- Most have **20-30** primary schools

**Crawley is a place that people want to visit, to have fun and spend their leisure time**

3:30 am - 28 Aug 2019

1 Retweet

1 Like



1



1

Saturday 31 August 2019



Crawley Council @crawleybc

Follow

Tell us what type housing should be prioritised over the next 15 years in our Local Plan survey: [snapsurveys.com/wh/s.asp?k=156...](https://snapsurveys.com/wh/s.asp?k=156...)

**Housing delivery**

By 2035, about 4,800 new homes will have been built to support the needs of the growing population. 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.

**The facts and figures**

- 55 per cent of new homes built with green credentials (smaller houses, smart for young families)
- Need for 632 affordable quality homes over 65 years
- Lower centre residential population: 214,831
- 3,000 new homes needed to meet the needs of the growing population
- There is land for 4,800 new dwellings
- 10,000 HOME POINTS (10,000 new homes)
- House prices 9.1% higher than 10.7% average
- Crawley's growing population needs 11,200 more homes between 2016-2035

**A mix of new homes will be designed for residents in all stages of life**

5:30 am - 31 Aug 2019

1 Retweet 1 Like



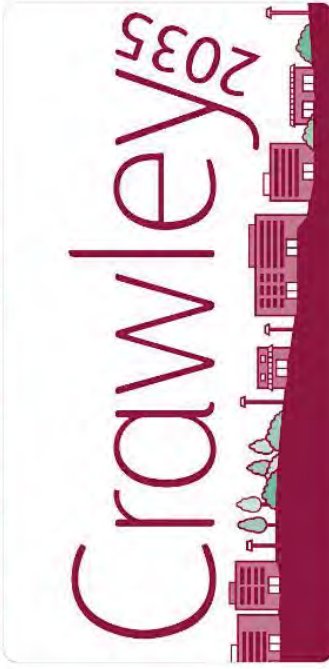
Wednesday 4 September 2019



Crawley Council @crawleybc

Follow

Give your views on sustainability, wellbeing, infrastructure, housing, culture and economic growth in Crawley by completing our Local Plan survey before 16 September: [snapsurveys.com/wh/s.asp?k=156...](https://snapsurveys.com/wh/s.asp?k=156...)



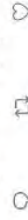
10:30 am - 4 Sep 2019

3 Retweets 1 Like



Replying to @crawleybc

i support the Venus project. it's the next stage in human social evolution.





Sunday 8 September 2019



Follow

We want to know Crawley's strengths and weaknesses so we can make changes for the better over the next 15 years.

Help us do that by completing our online survey before 5.30pm on Monday 16 September: [snapsurveys.com/wh/s.asp?k=156...](https://snapsurveys.com/wh/s.asp?k=156...)

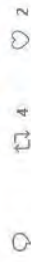
**Economic growth and social mobility**  
Additional jobs will have been created for people living in and around Crawley across a diverse range of sectors, including creative industries. Access to jobs will be supported by training and development opportunities giving people a real choice about the work they can and want to do. Sustainable growth of Gatwick Airport will continue to support the economic growth of the town.

**The town's vital figures**  
 95,000 jobs  
 3,400 active businesses  
 30,000+ Manor Royal people  
 240 jobs in the bottom 33 per cent of low earners in the town  
 £49m in new money for the town  
 32.85% of the town's population are in the top 10% of earners

**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**

8:30 am - 8 Sep 2019

4 Retweets 2 Likes



Tuesday 10 September 2019



Follow

Do you want to have your say on what the town looks like over the next 15 years?

You can do just that by completing our online survey before Monday 16 September: [ow.ly/H2UO50wvC7w](https://ow.ly/H2UO50wvC7w)

**Environmental sustainability**  
Air, noise and water pollution will be reduced. The borough will prepare for the increasing effects of climate change through adoption 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.

**The town's vital figures**  
 4,497 homes  
 111,700 jobs  
 83.3% of the town's population are in the top 10% of earners  
 24% of the town's population are in the bottom 33% of earners  
 10% of the town's population are in the bottom 10% of earners  
 60% of the town's population are in the bottom 50% of earners  
 22% of the town's population are in the bottom 20% of earners

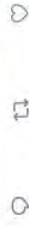
**Conserving natural resources to support future growth will be vital to the longevity of the town**

1:30 am - 10 Sep 2019

Sep 10

Replying to @crawleybc

it will look like a capitalist utopia.



Friday 13 September 2019

 **Crawley Council**  
@crawleybc

[Follow](#)

Crawley needs you! We've created a Draft Local Plan for 2020-2035 and we need your views on it.

Fill out our online survey before 5.30pm on Monday 16 September to have your say on how town looks over the next 15 years: [snapsurveys.com/wh/s.asp?k=156...](https://snapsurveys.com/wh/s.asp?k=156...)



**Housing delivery**

By 2035, about 4,800 new homes will have been built to support the needs of the growing population. 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.

**The facts and figures**

- 55 new homes built with green design that are affordable
- 214,831 new homes needed by 2035
- 3,000 new homes needed by 2025
- 4,800 new homes needed by 2035
- 11,200 new homes needed by 2035

**A mix of new homes will be designed for residents in all stages of life**

9:31 am - 13 Sep 2019

5 Retweets 2 Likes

[Retweet](#) [Like](#)

Monday 16 September 2019

 **Crawley Council**  
@crawleybc

[Follow](#)

Help us with Crawley's future by having your say on our Draft Local Plan 2035.

Tell us the most important issues that will need to be planned for over the next 15 years on our online survey before 5.30pm today: [snapsurveys.com/wh/s.asp?k=156...](https://snapsurveys.com/wh/s.asp?k=156...)



**Crawley 2035**

3:30 am - 16 Sep 2019

2 Retweets

[Retweet](#) [Like](#)

**More replies**

Replying to @crawleybc

when you cause someone harm, that affects everyone, including you, they then go might go on to cause others harm or diminish their potential to function in society or both, which then impacts society in general. no one wins, everyone loses. don't do it.

[Reply](#) [Retweet](#) [Like](#)

**Crawley Council** @crawleydc Follow

The autumn issue of Crawley Live is being distributed this week. Read all about Crawley 2035 – the local plan review, opportunities for small businesses and ideas to keep the family entertained during half term. [crawley.gov.uk/crawleylive](http://crawley.gov.uk/crawleylive)

1:53 am - 10 Sep 2019

2 Retweets 1 Like

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# Crawley 2035

### Wellbeing and communities

Some historic parts of Crawley have higher densities of **95** dwellings per hectare

There are **105** listed buildings

**20** allotments

**76** play spaces for children

**33** public parks and gardens

New town coverage densities of **20-30** dwellings per hectare

**92** outdoor sports spaces

**11** conservation areas

### Economic growth and social mobility

**MANOR ROYAL** **240** hectares

**3,400** active businesses within Crawley

**£49m** gross value added (GVA) lost through skills shortages

Town centre vacancy rates have fallen from: **9.2-7.8** per cent in January 2016 to April 2019

There is an unmet need of **32.85** hectares of business land

**Key growth sectors:** advanced professional services, manufacturing, food, communications, scientific and construction, health, retail

**Manor Royal 30,000+** people in 500 businesses

There is an unmet need of **32.85** hectares of business land

# Council Homepage

The screenshot shows the Crawley Council homepage with a navigation menu on the left containing links like 'HOME', 'About the Council', 'Business', 'Community and Neighbourhoods', 'Democracy', 'Council for and benefits', 'Health and Environment', 'Homes and Housing', 'Jobs and Careers', 'Learning', 'Leisure and Culture', 'News and Events', 'Planning and Development', 'Streets, Roads and Transport', and 'Waste and Recycling'. A search bar is located below the menu. The main content area features a large 'Crawley 2035' logo and a central message: 'We want to hear your views on Crawley 2035, the first stage in producing a new Local Plan that will guide development in the borough from 2020 to 2035.' Below this is a 'My Neighbourhood' section with a map and a list of areas: Breetchan, Broadfield, Forge Wood, Furnace Green, Oldscape Green, Park, and Langley Green. Other sections include 'What's On' with a list of events, 'Local Information', 'Most Popular' links, and 'Get Involved' with a sign-up form for email alerts.

## Help plan the future of your town

Planning affects us all. The homes we live in, the places where 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.

The way that the whole town develops in the future will be affected by planning. Crawley Borough Council has started work on a review of its local plan that will help to guide development in Crawley over 15 years from 2020-2035.

This draft local plan review follows a review of the existing adopted local plan; it doesn't start from a blank page. In many cases, the principles and policies in the local plan remain up-to-date and 'sound'.

However, there is a greater emphasis on a number of policy areas, including health and wellbeing, higher environmental standards for new houses and housing to meet a wider range of needs.

It is important that local people, groups and organisations are able to put across their views and participate in the way that we plan the future of the town.

Until 16 September we are asking you to let us know what you feel are the most important issues for Crawley that will need to be planned for over the next 15 years.

For more information visit [crawley.gov.uk/crawley2035](http://crawley.gov.uk/crawley2035) or email [forward-plans@crawley.gov.uk](mailto:forward-plans@crawley.gov.uk)

## Housing delivery

Since adoption of the local plan, 45 per cent of new homes built with planning permission were affordable

**55** per cent increase in population over 65 years



House prices: 9.1x median earnings; lower quartile 10.7x earnings

There is land for **4,800** new dwellings

Need for 652 affordable dwellings in Crawley per year, of which 535 should be rented at affordable levels

Town centre residential: 214 831 dwellings in 2016, 2019

3,000 minimum dwellings in 2015

Crawley's growing population needs 11,200 more homes between 2020-2035

## Environmental sustainability

During peak hours there are around 33,000 vehicle movements within Crawley

**24** per cent of adults were estimated to be physically active in 2016/17

The borough covers **4,497** hectares

**111,700** total residents

10 per cent increase in residents since 2007 due to inward migration

At an average pace, you can cycle across Crawley in 30 minutes

**83.3** per cent of the adult population are economically active

60 per cent of residents are under 45 years of age (22 per cent aged 0-15 years)

58 per cent of car trips are under five miles and 25 per cent are under two miles

Cycling saves a typical commuter £740 a year