

# Crawley

Local Plan

**Draft Crawley Borough Local Plan 2021 – 2037  
January 2021**

**For  
Submission Publication Consultation: January – February 2021**





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## Foreword

Planning affects us all. The homes we live in, the places we work, the open spaces where we relax and the roads we travel on are all a result of planning decisions that have been made. Crawley Borough Council is revising the Local Plan in order to help to guide development in Crawley over the Plan period from 2021 – 2037.

To meet the needs of its growing population and its key economic role at the heart of the Gatwick Diamond, by 2037 Crawley would need to provide 12,000 more homes, generating approximately 20,500 new jobs. In the past, Crawley's growth has mainly been through the creation of entire new neighbourhoods, and commercial development at Manor Royal. However, Forge Wood is the last full neighbourhood which can be built within the borough boundary as there is simply no space left. Most of the large sites have been built out on Manor Royal, with many having been redeveloped.

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

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

This document is the draft new Local Plan which the council considers to be legally compliant and 'sound', and is available for full final public consultation ahead of its submission to central government for its independent examination.

I encourage you to respond.

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



## Crawley's Local Plan

- 1.1 The draft Crawley Local Plan Review seeks to revise the current adopted Crawley 2030 Local Plan in order to update it in accordance with national policies and local changes. This will ensure Crawley maintains an up-to-date Local Plan to support and direct the growth of the borough. The Local Plan is an important document which sets the way forward for planning the future of Crawley – where we live, work and visit – for the next 15 years. The Crawley Borough Local Plan Review has involved engagement with residents, businesses and other stakeholders throughout its production. The Local Plan provides a clear indication of the council's approach to the development of the town, including helping to support the delivery of key priorities: wellbeing and communities, economic growth and social mobility, housing delivery and environmental sustainability.
- 1.2 This document forms the Submission draft Crawley Borough Local Plan and is published for public consultation. It contains the emerging draft strategic and non-strategic planning policies and principles to help shape the future of the town. Some of the Policies are proposed to be retained from the existing Local Plan, others have been changed, and some new policies are being proposed. All elements of the draft Local Plan are publicised for scrutiny and comment.
- 1.3 Once adopted, this Local Plan will replace the Crawley Borough Local Plan (2015 – 2030) to provide the basis for future planning decisions in the borough. It sets out the strategic priorities for Crawley and the planning policies to deliver:
- Homes and jobs;
  - Provision of retail, leisure and other commercial development;
  - Provision of infrastructure for transport, telecommunications, water supply, wastewater, flood risk management, and energy;
  - Provision of community, social and cultural infrastructure and other local facilities;
  - Climate change mitigation and adaptation;
  - Conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure<sup>1</sup>; and
  - Control of Gatwick Airport.

### Current Stage of Consultation & Local Plan Timetable

- 1.4 This six-week period of public consultation forms a second "Publication" stage of the preparation of Crawley's Local Plan<sup>2</sup>. This forms the Local Plan the council considers to be its legally compliant and 'Sound'<sup>3</sup> Plan for Submission to central government for its Independent Examination. The Submission Draft Local Plan sets the planning policies associated with the future development and potential growth of Crawley over the next 15 years.
- 1.5 The consultation runs from **6 January 2021 until 5pm 17 February 2021**.

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

<sup>2</sup> This relates to Regulation 19 of the Town and Country (Local Planning) (England) Regulations 2012

<sup>3</sup> This means the Plan is positively prepared, justified, effective and consistent with national planning policy (National Planning Policy Framework, para. 35, 2019, MHCLG)

- 1.6 Responses must be provided in writing and using the council's Response Form. This can either be in electronic format (via email to [strategic.planning@ Crawley.gov.uk](mailto:strategic.planning@ Crawley.gov.uk) or by post to:  
Strategic Planning  
Crawley Borough Council  
Town Hall  
The Boulevard  
RH10 1UZ
- 1.7 The council's response form, which must be completed to make formal representations to the Local Plan, will be available for completion, or download, through the council's website: [www.crawley.gov.uk/localplan](http://www.crawley.gov.uk/localplan). Electronic copies are available to view at the Town Hall. You are invited to respond on the document as a whole, a specific topic area, a policy or a paragraph.
- 1.8 This document is considered to be a draft Local Plan Review. It follows a review of the existing adopted Local Plan, and does not seek to start from a blank page. In many cases, the principles and policies of the Crawley Borough Local Plan 2015 remain up-to-date and 'sound'. Therefore, for some topic areas, progress is well advanced and there may be little change proposed to the current approach. For other areas, the review has provided the opportunity for proposing a change or a new approach to be considered.
- 1.9 Following the close of consultation, all responses received will be collated and submitted to the Planning Inspectorate as part of the Submission of the Plan for its independent examination.
- 1.10 The following timetable sets out details of the consultations and critical stages for the Local Plan's preparation.

Stage	Date
Early Engagement consultation	15 July 2019 – 16 September 2019
Publication (Submission) consultation	20 January – 2 March 2020
Additional Publication (Submission) consultation	6 January – 17 February 2021
Submission	March 2021
Examination in Public	May – September 2021
Adoption	March 2022

**Consultation Statement:**

- 1.11 The previous stage of Publication (Submission) Consultation, took place between January and March 2020. This stage is now being repeated due to updated evidence, changes in national policy and guidance from the Planning Inspectorate. The first Publication Consultation followed a formal decision taken at Full Council in December 2019. In total, 69 representors made formal representations on wide ranging matters. The responses received during the initial Publication consultation

have been collated and published as part of the draft Local Plan Consultation Strategy. Where considered appropriate, matters raised have sought to be addressed through amendments to the Plan. These amendments are currently subject to further scrutiny as part of this formal public consultation. All comments received as part of both Regulation 19 consultations (January – March 2020 and the current, January – February 2021) will be submitted to the Planning Inspector.

- 1.12 “Early Engagement” consultation, took place between July and September 2019. This was a wide ranging consultation, using a variety of media and medium in order to generate debates regarding the future growth of Crawley and the emerging draft planning policies. Staffed exhibitions were held at different venues and at different times to engage residents, visitors and employees in Crawley, and forums were held with specific invitees from developers and businesses, and community groups. Officers attended meetings to promote the Plan and the consultation and receive feedback. In total, 210 representatives provided comments, including 76 from the online and paper survey, 50 businesses, organisations, authorities and agencies, and local residents by email and attending the exhibitions. Full details of the consultation and all representations received, along with the council’s response detailing how the comments have been taken into account in preparing this Submission Version of the Plan are set out in the draft Local Plan Consultation Statement.
- 1.13 In addition, the draft Local Plan Consultation Statement sets out the full details of this current Submission consultation.

### Preparation of Evidence Base

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

#### Evidence Base

- 1.15 It is essential that, to meet the requirements set by national guidance, the Local Plan is underpinned by an adequate, up-to-date and relevant evidence base<sup>4</sup> about the economic, social and environmental characteristics, needs and prospects of the area. In light of this, new and updated studies have been carried out to ensure Crawley’s Local Plan will reflect the locally distinctive issues, challenges, and opportunities, unique to the town. These include the following:
- **Deliverability of the Local Plan:** draft Sustainability Appraisal Report; a draft Infrastructure Plan; and an updated Viability Study.
  - **Housing Needs:** Strategic Housing Market Assessment (SHMA); Strategic Housing Land Availability Assessment (SHLAA); Housing Trajectory; and Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment Review.
  - **Employment Land Requirements:** Economic Growth Assessment (EGA) and update; Employment Land Availability Assessment; Employment Land Trajectory (ELT); and a Retail and Leisure Assessment and Town Centre Neighbourhood Needs Study.
  - **Constraints and Assets:** Habitat Regulations Assessment; Strategic Flood Risk Assessment (SFRA); Baseline Character Assessment; Densification Study; ASEQs and Locally Listed Buildings Heritage Assessment; Noise; Built-Up Area Boundary; Landscape Character Assessment; Historic Parks & Gardens Review; Green Infrastructure Plan; Transport Modelling; Eco-Serv Report; Playing Pitch Assessment, Indoor Sports Study and Open Space Study; updated Water Cycle Study; and Heritage Assets Review.

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<sup>4</sup> National Planning Policy Framework, paragraph 31 (2019) MHCLG

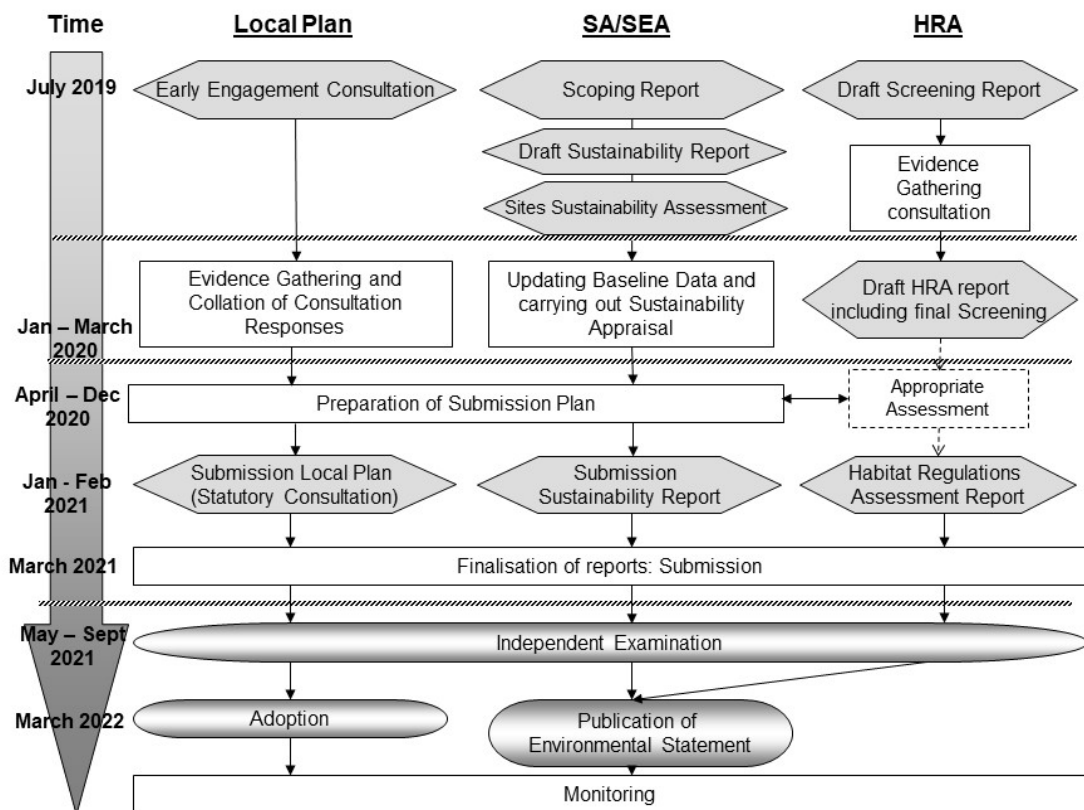
1.16 More detail regarding the technical studies is included within the topic chapters, where appropriate, supporting the context and justification for the policies and a full list can be found at the end of this document. Additional evidence will continue to be gathered as required. The completed evidence base studies are available alongside the Local Plan to support this consultation.

**Sustainability Appraisal**

1.17 All Local Development Documents must be prepared with a view to contributing to the achievement of sustainable development<sup>5</sup>. The requirement for a Strategic Environmental Assessment (SEA) is originally set out in European legislation<sup>6</sup> which was adopted into UK law as the “Environmental Assessment of Plans and Programmes Regulations 2004”. An SEA ensures that the environmental effects of certain plans and programmes, including land-use plans, are taken into account.

1.18 The aim of the Sustainability Appraisal (SA) is to ensure that the Local Plan is as sustainable as possible. The process involves examining the likely effects of the Plan and considers how they contribute to environmental, social and economic wellbeing.

1.19 As the SA and SEA processes are so similar they will be undertaken together and for ease of reference, both processes are referred to as the Sustainability Appraisal. The SA/SEA processes consider the impacts of proposed development options on people’s health and covers the criteria of a Health Impact Assessment (HIA). The SA/SEA also considers the potential effects of the Plan on people in respect of disability, gender and racial equality impacts, in accordance with the requirements of the Equalities Act 2010 for an Equalities Impact Assessment (EIA).



1.20 A draft Sustainability Appraisal Report to support the Local Plan Review has been produced. The Scoping Report was published and subject to formal consultation as

<sup>5</sup> Section 39 of the Planning and Compulsory Purchase Act 2004

<sup>6</sup> European Directive 2001/42/EC



part of the Early Engagement consultation alongside the Local Plan. The draft Sustainability Objectives are set out in Appendix A of this document along with the summary table of outcomes of the Local Plan Policy Sustainability Appraisal assessments.

### Infrastructure Plan

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

### Local Plan Map

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

### Duty to Cooperate

- 1.24 The Duty to Cooperate<sup>7</sup> establishes a need to plan for cross-boundary strategic issues, and places a requirement on planning authorities to work together on such issues.
- 1.25 The Duty applies to all local planning authorities, national park authorities and county councils in England, and to a number of other public bodies. The Duty:
- relates to development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council;
  - requires that councils set out planning policies to address such issues;
  - requires that councils and public bodies ‘engage constructively, actively and on an ongoing basis’ to develop strategic policies;
  - requires councils to consider joint approaches to plan making.
- 1.26 The NPPF provides further guidance on meeting the Duty to Co-operate in plan-making. Effective and on-going joint working should be demonstrated through the preparation and maintenance of Statements of Common Ground, documenting the cross-boundary matters being addressed and progress in cooperating to address them. These should be made publicly available throughout the plan-making process to provide transparency<sup>8</sup>.
- 1.27 The strategic issues relating to the future development of Crawley over the Local Plan period have been identified as including:
- Meeting housing needs
  - Economic growth
  - Gatwick Airport

<sup>7</sup> Section 110 of the Localism Act provides the legislative basis for the Duty by transposing it into a new Section 33a of the Planning & Compulsory Purchase Act 2004.

<sup>8</sup> National Planning Policy Framework, paragraph 27 (2019) MHCLG

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

### Monitoring & Review

- 1.31 The draft Local Plan period will cover 15 years between the anticipated adoption year of 2022 and 2037. It will be prepared in order to be flexible and appropriate for ensuring delivery of sustainable development and economic growth throughout a range of economic and social cycles.
- 1.32 However, the Local Plan will be subject to continual monitoring to ensure the policies remain relevant and effective, and a review will be undertaken in 2027, at the latest, to ensure the Local Plan remains up-to-date, in accordance with the requirements of the NPPF. Should it be considered, at that stage, that a partial or full update of the Plan is required, this will be reported in the Authority's Monitoring Report and the

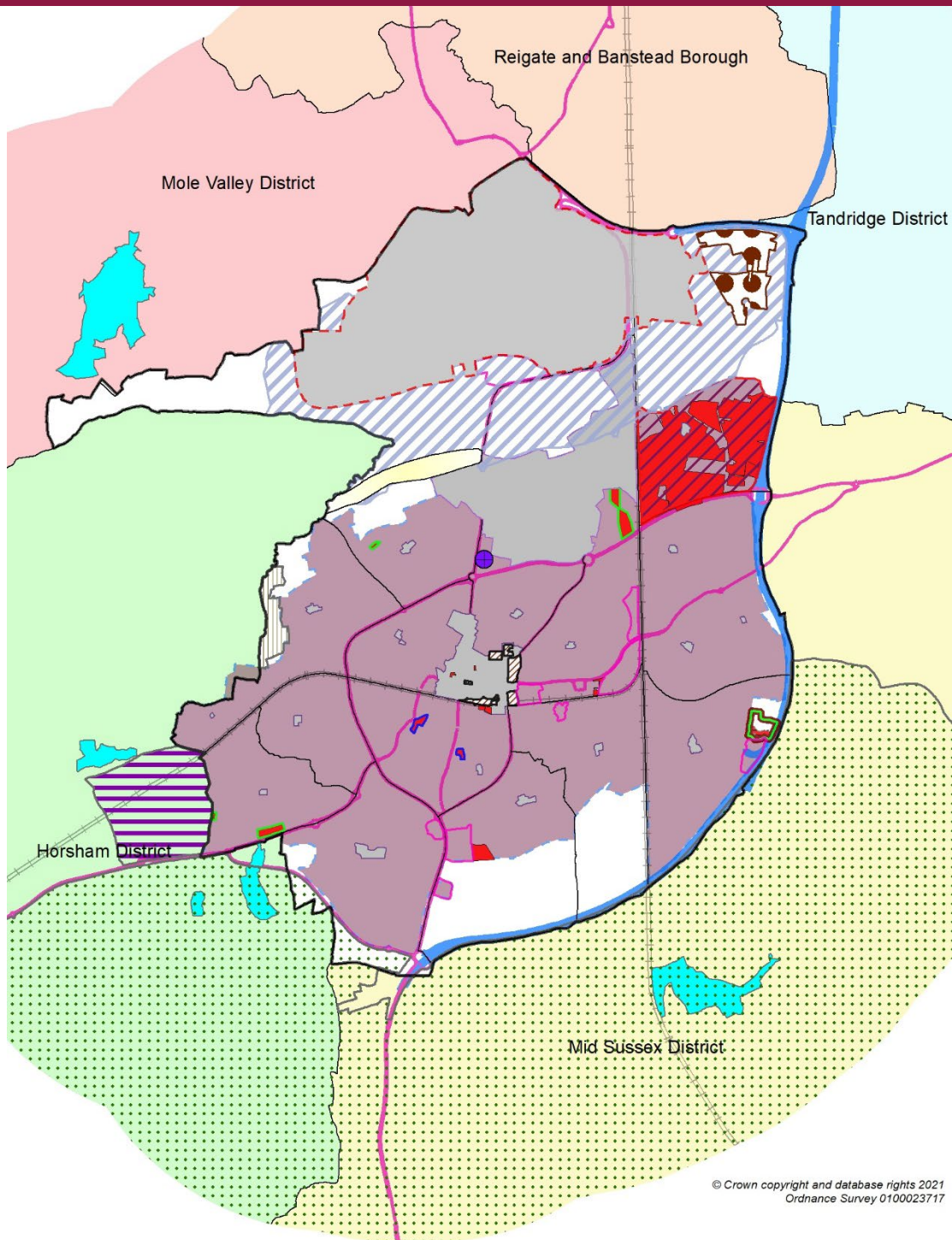
timetable for this process will be established by the council's adopted Local Development Scheme.

- 1.33 In particular, should changes to national aviation policy allow for the removal of the safeguarding of all the land for Gatwick Airport expansion, the opportunities and constraints of this land will be considered comprehensively through a review of the Local Plan, rather than as piecemeal development.

### Supporting Guidance Documents

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

## Key Diagram



- |   |  |  |
|---|--|--|
| <ul style="list-style-type: none"> <li>— Crawley Borough Boundary</li> <li>■ Built-Up Area Boundary (Policy CL8)</li> <li>■ Strategic Employment Location (Policy EC1 &amp; EC4)</li> <li>■ Indicative Search Corridor for a Western Link Road (Policy ST4)</li> <li>■ Gatwick Airport Boundary (Policy EC1, EC2, GAT1, GAT3, GAT4)</li> <li>■ Gatwick Airport Safeguarded Land (Policy GAT2)</li> <li>■ Main Employment Area (Policy EC1 &amp; EC2)</li> <li>■ Manor Royal (Policy EC1, EC2, EC3)</li> <li>■ Neighbourhood Parades (Policy EC11)</li> <li>■ Town Centre Boundary (Policy EC2, TC1-TC5, H2, H3c)</li> </ul> | <ul style="list-style-type: none"> <li>■ Forge Wood Neighbourhood (Policy H2)</li> <li>■ Key Housing Sites (Policy H2)</li> <li>■ Indicative Key Housing Site (Policy H2)</li> <li>■ Biodiversity and Heritage Enhancements (Policy H2)</li> <li>■ Housing and Community Facilities (Policy H2)</li> <li>■ Housing and Open Space (Policy H2)</li> <li>■ Housing for Older People and those with Disabilities (Policy H2)</li> <li>■ Town Centre Key Opportunity Site (Policy TC3 and H2)</li> <li>● Broad Housing Locations (Policy H2)</li> <li>■ Kinwood Vale (Joint Area Action Plan)</li> </ul> | <ul style="list-style-type: none"> <li>■ Sites of Special Scientific Interest (Policy G12)</li> <li>■ Local Green Space (Policy G14)</li> <li>■ High Weald Area of Outstanding Natural Beauty (Policy CL9)</li> <li>— A Road</li> <li>— Motorway</li> <li>— Railway</li> </ul> |
|---|--|--|



## Crawley: A Vision

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

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

*By 2037, Crawley will be a place that people want to visit, to have fun and spend their leisure time. As a town within a countryside setting that is very much valued by local people, it will be safe and well cared for. The rich heritage which has shaped what the town is today will be respected, protected and enhanced.*

*Local communities will be directly involved in planning how the town grows and develops in order to achieve the best outcome for all concerned; particularly where difficult choices have to be made. Neighbourhoods will continue to offer local facilities and amenities that can be easily accessed along with informal green spaces for all to enjoy. The spirit and pride of individual communities will continue to be harnessed to make neighbourhoods the focus of local celebration. People will be encouraged to stay physically and mentally fit and active, high standards of health care will be delivered locally and people will be able to age with confidence as they grow older. Crawley's parklands and open spaces, its sporting and leisure facilities, along with its cultural offer, will be enhanced for the benefit of local people and visitors.*

### Creating Stronger Communities: Diversity and Community

*Neighbourhoods will continue to feature in the development of the town, recognising the important role they play in helping shape and develop communities. Growth will be sustainable and supported by an infrastructure plan that complements development enabling people to live a long and happy life. All people who live here will be proud, confident and self-reliant, working together and with others for the good of the town. Crawley will continue to improve the quality of life for its residents throughout every stage in their life. Excellent early years' provision will support children's development, which will be further assisted by the provision of good primary, secondary, further and higher education. Education, for both young and old, should unlock potential, giving people a real choice about what they do in their working life.*

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

*As a progressive town, Crawley will strive to be the premier town between London and the South Coast providing jobs, learning and development opportunities and a leisure and cultural offer that is attractive to residents and visitors. Crawley will continue to be an economic leader, with a diverse, resilient and productive economy that meets the needs of the borough and supporting the overall prosperity of the region. An environment that supports and encourages new and established businesses to grow and flourish will be developed, and supporting necessary infrastructure, including telecommunications, will be enhanced. Crawley will be the first choice of business location for a variety of sectors and both domestic and international markets. Innovation, entrepreneurship and advanced technologies will thrive, and our community will benefit from access to high value, sustainable economic growth. Additional jobs will have been created for people living in and around the Crawley area across a diverse range of sectors, including creative industries. Access to jobs will be supported by learning and development opportunities giving people a real choice about the work they can and want to do.*

*Redeveloping and revitalising the Town Centre and further regeneration of the Manor Royal Business District, and identifying land for a new industrial-led Strategic Employment Location will reinforce the status of Crawley as the place to do business in the South East. Manor Royal will be seen as a premier business park, attracting sustained business investment that will deliver high value employment and higher levels of productivity and economic growth. Sustainable growth of Gatwick Airport will help to support the economic growth of the town, whilst opportunities for new employment land will be explored.*

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

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

*By 2037, 5,300 new homes will have been built to support the needs of the growing population. A mix of new homes will be designed for residents in all stages of life. These will be built in locations which respect the town's unique development and design principles and preserve the most valued of the town's environmental features.*

### Protecting the Environment: Sustainability

*By 2037, in response to the Climate Emergency, significant progress will have been made towards Crawley becoming a carbon neutral town. Crawley will be seen as a place where green growth is the driver of the economy and where green technology and businesses can thrive. Active travel and public transport will be significantly improved and supported by a road network that prioritises sustainable transport modes. Electric Vehicles will be promoted along with, and through, e-car clubs. A sustainable road network will be complemented by a good public transport system, giving people choice about how they travel. As a modern town, the technological and communication infrastructure will be in place to ensure residents and businesses have the support needed to develop and grow.*

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

# Crawley Borough Local Plan

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

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

## Spatial Context

- 2.2 Crawley is situated in the north eastern part of the county of West Sussex. Horsham district abuts the town on the western side, Mid Sussex district is to the south and east whilst the county of Surrey lies to the north of the borough beyond Gatwick Airport.
- 2.3 Crawley borough covers 4,497 hectares. Its administrative boundaries are drawn tightly around the town itself, with very little land falling outside of the built up area. This is particularly the case to the west of the urban area, although this location offers some of Crawley's greatest connections, visual and physical, with the open countryside beyond. The M23 motorway forms the borough boundary to the east/south east. To the south, beyond the M23 and the A264 dual carriageway, lies an Area of Outstanding Natural Beauty. Gatwick Airport is located within the borough to the north of the town – the land between the town and the airport is heavily constrained by noise and may potentially be required for the future development of the airport.
- 2.4 Migration patterns for Crawley show the strongest relationships with neighbouring areas of Mid Sussex and Horsham, followed by Reigate and Banstead, as well as having notable inflows from Croydon<sup>9</sup>. The Crawley Travel to Work Area extends to include Horley, Redhill, Leatherhead and Dorking (essentially extending north to the M25) as well as the main settlements in both Horsham and Mid Sussex<sup>10</sup>. These commuting patterns indicate the role Crawley plays across this wider area in providing employment for significant numbers of people.

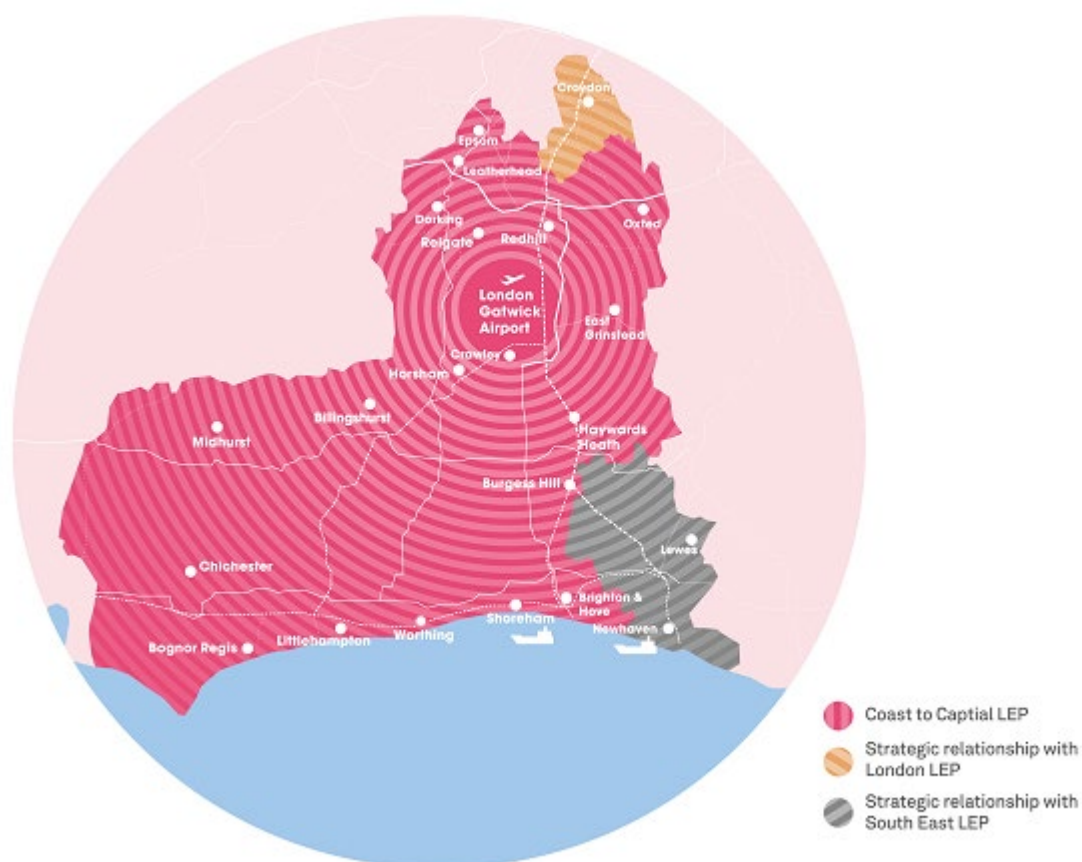
### **Gatwick Diamond & Greater Brighton**

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

<sup>9</sup> ONS (2014) based on 2011 Census data.

<sup>10</sup> 2011 Census/ONS analysis (2014)

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



**Fig 1: Crawley in the Context of the Coast to Capital Local Enterprise Partnership Area<sup>11</sup>**

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

**A New Town in a countryside setting**

- 2.9 Crawley was designated a New Town in 1947 and incorporated the settlements of Crawley, Ifield and Three Bridges. As a planned New Town, it was organised and

<sup>11</sup> Strategic Economic Plan, Gatwick 360° (2018) Coast to Capital Local Enterprise Partnership

designed around a neighbourhood structure. Laid out according to twentieth century quality of life and sustainable development principles, Crawley has subsequently grown beyond the original masterplan and many elements of the original New Town now form an important part of the town's history.

- 2.10 The masterplan phased the development of the town through the addition of complete neighbourhoods, each with good access to its own centre offering a mix of uses to serve local needs. The relatively small size of each neighbourhood was intended to help build up the new communities, achieve closer integration and provide greater accessibility to the neighbourhood centres. In 2037, the principle of the neighbourhoods will remain a characteristic of the town, and neighbourhood centres will continue to play an important role as a focal point for community facilities and local shopping.
- 2.11 Crawley's urban and landscape structure consists of a number of distinct character components, such as:
- The Economic Centres (Crawley Town Centre, Manor Royal and Gatwick Airport);
  - The Historic Town of Crawley (the pre-'New Town' Crawley: including Medieval, Late Victorian, Edwardian. Forming the area stretching from, and including, Goffs Park/Ifield Road/St. Peters, east to, and including, the historic High Street area and Alms Houses and south to include Brighton Road and Malthouse Road);
  - The Historic Villages (Ifield, Worth, Three Bridges);
  - The 1950s-70s 'New Town' Neighbourhoods;
  - The sylvan or wooded suburbs;
  - The places connected to open countryside (visually and physically) (wider Ifield along Rusper Road, beside Tilgate Park, Worth Village);
  - Areas of Open Parkland, Countryside and Meadows (Tilgate, Ifield Meadows, north of Manor Royal, Langley Green and Pound Hill/Forge Wood, Pease Pottage and the High Weald Area of Outstanding Natural Beauty).
- 2.12 The management of change is necessary so as not to unduly restrict growth whilst retaining the valued features of the town. This will be achieved through the assessment of the character of the borough, the protection and enhancement of important and positive assets, improvements to areas with significant negative features and the delivery of high quality development that takes full account of its context.
- 2.13 The Local Plan Review continues to ensure the protection of other valued features of the natural and built environment, both within and around the town. New development will provide high quality environments and will be of a high standard of design and sustainable construction. The character of the countryside surrounding the town will be protected through the Local Plan by policies which set out the considerations for the land beyond the built-up area boundary.

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

- 2.14 Crawley is the largest economic centre in the Northern West Sussex Functional Economic Market Area<sup>12</sup>, and also the largest economic area of the Gatwick Diamond representing a significant proportion of its total commercial floorspace and employment. While Crawley boasts average salaries that are among the highest of the Gatwick Diamond, many residents are employed in low skilled industries, and it is recognised that on average people who travel into Crawley for work earn more than local people. Crawley's resident workforce has a lower than average level of Qualifications at NVQ4 and above (36.9%) when compared to the South East region (42.2%) and Great Britain (39.3%) as a whole and many firms are concerned about

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<sup>12</sup> i.e. that covering Crawley Borough, Horsham and Mid Sussex Districts



skill shortages. Unemployment in Crawley has been historically low and, prior to the Covid-19 pandemic, the Local Universal Credit claimant count was at 2.8% in March 2020. This has risen sharply to 7.5% in August 2020, given the significant impact the pandemic has had on Crawley's aviation-related employment sectors, making Crawley the worst affected in the Coast to Capital LEP area. Through the Crawley Employment and Skills Programme 2019-2024, positive steps are being made to address the skills gap and help Crawley residents to better access employment.

- 2.15 Reflecting the critical economic role of Crawley, within the borough and for the wider economy beyond, the Local Plan seeks to ensure sustainable economic growth is achieved through the consolidation and enhancement of the existing main employment areas, identification of new employment land, helping residents that need support in accessing the job market, and supporting greater diversification and flexibility to help Crawley's economy adapt to future change.

## **The Economic Centres**

### Manor Royal

- 2.16 Manor Royal is one of the largest business parks in the south east covering a total of 240 hectares and is home to more than 600 businesses and over 32,000 jobs – which accounts for 40% of Crawley's total employment. It provides 77% of Crawley's employment land; 19% of employment land in West Sussex; and 22% of employment land in the Gatwick Diamond. Since its official naming in 1950, Manor Royal has evolved and diversified its employment offer from its traditional manufacturing base of 60 years ago, and its notable size, scale and varied business base represent key strengths. The redevelopment and intensification of existing sites, and identification of appropriate extensions to extend Manor Royal, will help add to its available land supply pipeline, whilst focus on high quality design and the provision of supporting facilities for employees and visitors will reinforce its status as a premier business destination.

### Crawley Town Centre

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

### Gatwick Airport

- 2.18 The economy of Crawley, and the wider Gatwick Diamond area, is buoyed by the presence of Gatwick Airport. 75% of Crawley's jobs (by employment numbers) is in distribution, hotels, transport, communications, banking and finance of which Gatwick Airport accounts for approximately 25,000 jobs directly. Crawley is the main place of residence for airport employees with 26.9% of the workforce living in Crawley. The economic situation arising from the Covid-19 pandemic had a major impact on the aviation sector, which in turn has significantly affected Crawley's economy given the important role of aviation and its related sectors.

### New Strategic Employment Location

- 2.19 There remains significant remaining need for a minimum of 24.1ha new industrial-led employment land in Crawley, principally within the logistics and warehouse sectors. Therefore, a Strategic Employment Location is allocated at land East of Balcombe Road at Gatwick Green.

### **Meeting housing needs**

- 2.20 Crawley's development as a New Town, in addition to the influence of Gatwick Airport, has significant implications for the future of the town in terms of population growth; and the need to accommodate development remains a key challenge for Crawley. By 2037, to meet the needs of its growing population, the town would need a further 12,000<sup>13</sup> new homes. Accommodating even some of this need involves difficult decisions and invariably places pressure on some of the key features that define Crawley's character.
- 2.21 Crawley's population profile is very different to most neighbouring areas and this places its own special demands upon the local economy and local services. The population reached 106,600 in 2011 (an increase of about 22% since 1991) and stands at 113,500 residents currently<sup>14</sup>. Crawley has a greater proportion of younger people (between the ages of 25 and 34) and a lower percentage of elderly, compared with the rest of the South East; with about two-thirds of Crawley's population less than 45 years of age. However, future demographic change particularly as the younger population have families will intensify demands upon the need for housing, along with social, community, leisure, educational and retail facilities. This is in clear contrast with the demographic challenges faced by many neighbouring districts. Furthermore, the ageing population is increasing at a disproportionately faster rate than other age groups, with growth of 65 years and over population accounting for 35% of the total projected change.
- 2.22 In line with national guidance, sufficient market and affordable housing should be provided to meet the needs of existing and future households across the housing market area as well as to provide an appropriate amount to sustain the local economy. However, this must be reconciled with the other priorities in the draft Local Plan, particularly those with regards to protection and enhancement of the built and natural environment, and meeting the objectives for future economic growth. The confined boundaries of the borough and the scarcity of land without physical and policy constraints makes the need to balance and plan for any growth particularly challenging.

### Identification of Housing Sites in Crawley

- 2.23 Crawley's identified land supply allows for almost 50% of its housing needs to be met through new housing developments within the borough boundaries. Much of this is to be delivered through the completion of the Forge Wood neighbourhood in the north east of the borough, and through residential development in the town centre<sup>15</sup>, with the remainder coming forward on a number of smaller sites within existing neighbourhoods.
- 2.24 Within the borough, the identification of housing sites has required consideration of all competing land use needs including open space and employment to ensure an appropriate balance has been struck in delivering sustainable development.
- 2.25 All sites, small/medium up to entire new neighbourhoods, contribute towards meeting housing requirements in Crawley, particularly as the land supply available within the administrative and urban boundaries of the town is becoming increasingly constrained. Nevertheless, as a New Town with a large stock of modern and generally well-designed and laid out housing, precedence for maintaining this

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<sup>13</sup> For the period from 2021 to 2037: 750 dwellings per annum x 16 years, based on the Standard Methodology Figure 2014-based Household Projections, calculated January 2021.

<sup>14</sup> ONS Population Projections (2020) based on 2018 data:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

<sup>15</sup> A total of 3,264 dwellings to come forward within Forge Wood and the Town Centre combined (1,038 in Forge Wood + 2,226 in the town centre) out of the total net supply of 6,056 dwellings over 2020 – 2037 = 54%

standard has been set. All new housing and surroundings should be suitable in terms of size, design and facilities for the requirements of its occupants and should not lead to environmental and amenity problems.

### Crawley's Unmet Housing Needs

- 2.26 The scale of unmet need of approximately 6,680 dwellings over the Plan period is fully acknowledged and is being discussed with neighbouring authorities in a constructive and effective manner, including across the Gatwick Diamond and West Sussex and Greater Brighton.
- 2.27 Crawley's housing market functions within a wider geographic area – identified as the Northern West Sussex Housing Market Area, which is predominantly within the local authority administrative areas of Crawley Borough, Horsham and Mid Sussex Districts; extending northwards into the administrative area of Reigate and Banstead Borough to a lesser degree. Taken as a whole, the towns within the Northern West Sussex Housing Market Area provide a complementary role, offering housing opportunities for the local population and workforce for each stage and socio-economic position within lifecycles, and providing housing for employees working at Gatwick Airport and Manor Royal. This highlights a critical inter-dependence and reliance between areas with regard to housing and economic growth.
- 2.28 In the preparation of the adopted Crawley Borough Local Plan 2015, it was recognised by the authorities across the Northern West Sussex Housing Market Area that Crawley had sought to fully maximise its capacity for housing development within the borough boundaries in order to meet its own housing needs<sup>16</sup>. Similarly, each authority within the area considers it is doing the maximum reasonable to meet the objectively assessed housing needs of the area as a whole, taking into account local constraints, local aspirations and the need for sustainable development<sup>17</sup>. Further acknowledgement is provided within the adopted Development Plans for Horsham, Mid Sussex and Reigate and Banstead: with recognition that their housing provision figures will contribute to meeting the wider needs of the Northern West Sussex Housing Market Area and supporting the delivery of economic growth within the Gatwick Diamond<sup>18</sup>.
- 2.29 However, the increase in projected annual household growth through the Standard Method (which includes 40% uplift for addressing affordability), and the additional seven years beyond the adopted Plan period (2030 – 2037) has increased the amount of unmet need to be addressed by the Local Plan Review. This is acknowledged to be increasingly challenging for the Housing Market Area, as the need figures for Mid Sussex and Horsham districts using the Standard Method are also significantly increasing (see table below).

	Crawley	Horsham	Mid Sussex	NWS HMA total
Existing Local Plan Objectively Assessed Housing Needs	675dpa	650dpa	876dpa	2,201dpa
Existing Local Plan Requirements	340dpa	800dpa	964dpa	2,104dpa
Standard Method Requirement <sup>19</sup>	750dpa	965dpa	1,102dpa	2,817dpa

<sup>16</sup> Northern West Sussex Authorities Position Statement, paragraph 6.13 (September 2013), Crawley Borough Council, Horsham District Council and Mid Sussex District Council

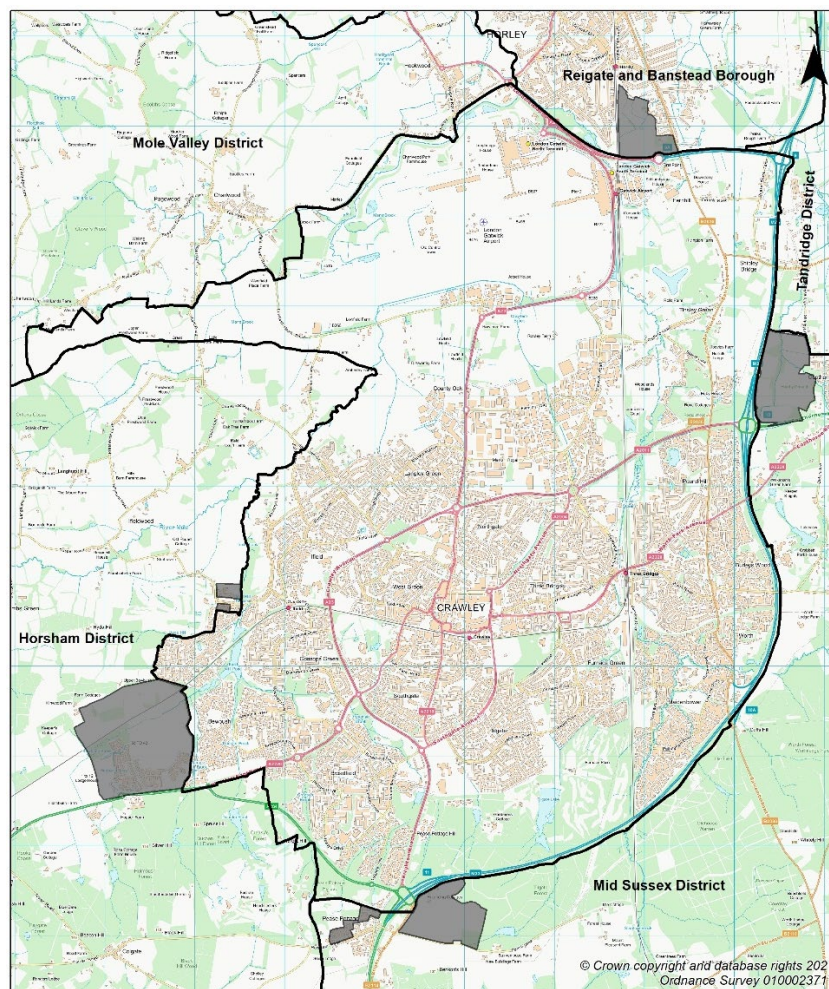
<sup>17</sup> Northern West Sussex Authorities Position Statement, paragraph 6.21 (February 2015), Crawley Borough Council, Horsham District Council and Mid Sussex District Council

<sup>18</sup> Reigate and Banstead Core Strategy, paragraph 7.4.1 – 7.4.4 (2013) Reigate and Banstead Borough Council; Horsham District Planning Framework, paragraph 6.3 (November 2015) Horsham District Council; Mid Sussex District Plan 2014 – 2031, Policy DP4: Housing, second paragraph, page 30, and Policy DP5: Planning to Meet Future Housing Need, pages 33-34 (March 2018) Mid Sussex District Council

<sup>19</sup> 2014-based Household Projections; affordability ratio ONS 2020

### Development adjacent to Crawley

- 2.30 Delivery of homes in new neighbourhoods in close proximity to Crawley is an appropriate way to meet the needs of the emerging households from within the existing population, and joint working has been long established in recognition of this. This has included the Joint Area Action Plan prepared and adopted by Crawley Borough and Horsham District Councils in 2009 for West of Bewbush which is seeing the current delivery of the new Kilnwood Vale neighbourhood, immediately adjacent to Crawley's boundary whilst being located wholly within Horsham District. The identification of a Strategic Development Location to the West and North West of Crawley for 2,500 homes was set out in the West Sussex Structure Plan. Kilnwood Vale was subsequently determined as the most appropriate location to take forward following detailed assessments of the opportunities and constraints for providing a new neighbourhood and development potential around all of Crawley's boundaries<sup>20</sup>.
- 2.31 In addition to Kilnwood Vale, the new neighbourhood within Crawley's administrative boundaries (Forge Wood) and the new neighbourhood level extensions to Horley (within Reigate and Banstead administrative boundaries) are being progressed. Further significant level of development is permitted, and taking place, to the east of Crawley's administrative boundaries at land west of Copthorne, to the west along Rusper Road and to the south, in the Area of Outstanding Natural Beauty, at Pease Pottage. The development coming forward adjacent to the borough's administrative boundary, is shown on the plan below.



**Fig 2: Planned Development Adjacent to Crawley**

<sup>20</sup> At Crawley Study (2009) GL Hearn

- 2.32 Other potential urban extensions to Crawley may include extensions to the east and/or west of the borough boundary. All opportunities are being explored to understand whether these would constitute the most sustainable housing development locations in the context of the wider housing market area and travel to work area and whether the existing infrastructure, and environmental constraints can be resolved.
- 2.33 This plan should not be considered as an indicator of the extent of acceptable development adjacent to Crawley. Many physical, environmental and policy designations apply to these areas, including Green Belt, Area of Outstanding Natural Beauty, Ancient Woodland and Sites of Special Scientific Interest. The planning policies of the neighbouring authorities will apply in cases of development outside of Crawley's administrative boundaries. However, it illustrates the locations of current developments taking place close to Crawley which will have implications for, and impacts on, Crawley's infrastructure and setting.

### ***Environmental sustainability***

- 2.34 Crawley borough has some unique characteristics and opportunities that enable the delivery of a clear approach to mitigation against, and adapting for a changing climate, whilst positively embracing the town's ambitious target of being carbon neutral by 2050. This uniqueness arises from the density of the urban area, the level of anticipated development and the clearly identifiable opportunity areas such as the Manor Royal business district, the town centre redevelopment areas and Gatwick Airport.
- 2.35 Furthermore, the borough is identified as an area of high radiant energy and subject to serious water stress. 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.
- 2.36 The borough's Green Infrastructure Network is critical to provide connective ecological network opportunities through the urban area, for biodiversity and human mental and physical health benefits. This connects beyond the borough's boundaries to the wider countryside located mainly within the neighbouring authority areas. Ongoing partnership working<sup>21</sup> will continue to maximise opportunities to conserve and enhance the green infrastructure network across boundaries.
- 2.37 As a result of this, there are several areas where the planning system can build upon nationally described standards to ensure that the borough's potential to adapt and mitigate against the effects of climate change is maximised. These are fundamental to the priority objectives for Crawley to 2037 and to the most significant elements of the town's locally distinctive context.
- 2.38 The priority areas are:
1. Ensuring new buildings are low carbon
  2. Bringing forward district energy networks
  3. Combating serious water stress
  4. Promoting public transport and active travel
  5. Protecting and enhancing the Green Infrastructure Network in terms of connectivity, accessibility and net gain in biodiversity, including water quality.

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<sup>21</sup> Including as part of the Sussex authorities in partnership with the Sussex Biodiversity Record Centre; the Gatwick Diamond Authorities; Gatwick Greenspace Partnership; and through individual cross-boundary discussions on site-specific matters.



### **Accessible transportation links**

- 2.39 Crawley has excellent communications, lying adjacent to the M23, close to the M25 and is on the main railway line linking London to the south coast. Gatwick Airport is located within the borough. The town itself is served by a rapid guided bus service: Fastway, and a network of green corridors, providing attractive pedestrian and cycle routes through the neighbourhoods and into the town centre and out into the countryside. The National Cycle Route 21, from Greenwich to Eastbourne and forming part of the “Avenue Verte” Greenway, linking London to Paris, also runs through the borough.
- 2.40 Attractive and effective public transport is essential in order to facilitate and encourage a shift to sustainable modes of transport. In order to make effective use of land, the identification and delivery of improved public transport needs to be focused on optimal routes and connecting the higher density neighbourhoods to Crawley’s three primary economic centres and its two regional transport nodes: Three Bridges station and Gatwick Airport and its station. This will help to provide a viable, dependable and sustainable transport alternative. Together with promoting active travel, cycling and walking, this will lead to reduced carbon emissions, improved air quality, and a reduction in traffic volumes and the borough’s over-dependence and reliance on private vehicles for getting around.
- 2.41 All new development will be planned to maximise links in the transport network and opportunities for all forms of sustainable transport. A key priority area for the Plan period will be to build upon and improve the dependability, frequency, capacity and speed of the Fastway service in key areas of the borough, in order to encourage a viable and attractive alternative to car use, both for commuters, residents and visitors.

## **Planning Policy Context**

### **National Planning Policy Framework**

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

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

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

### **Crawley Borough Council Corporate Priorities**

- 2.45 The corporate priorities (2018 to 2022) set out the council’s strategic direction over the medium-term. The priorities consist of six key headline priority objectives which are underpinned by 24 objectives, projects and initiatives. The six priorities are:

- Delivering value for money and modernising the way we work;
- Delivering affordable homes for Crawley and reducing homelessness;
- Improving job opportunities and developing the local Economy;
- Creating stronger communities;
- Providing high quality leisure and culture facilities and supporting health and wellbeing services;
- Protecting the environment.

2.46 Planning within Crawley can affect and influence a number of these priorities. To reflect this, the Crawley Local Plan Review follows the Corporate Priorities:

1. Wellbeing & Communities
  - Corporate Priorities: Creating stronger communities & Providing high quality leisure and culture facilities and supporting health and wellbeing services.
  - Local Plan Chapters: Character, Landscape and Development Form, Design & Development Requirements; Heritage; Open Space, Sport & Recreation; and Infrastructure Provision
2. Economic Growth & Social Mobility
  - Corporate Priority: Improving job opportunities and developing the local Economy
  - Local Plan Chapters: Economic Growth; Gatwick Airport; and Crawley Town Centre
3. Housing
  - Corporate Priorities: Delivering affordable homes for Crawley and reducing homelessness
  - Local Plan Chapters: Housing Delivery; and Meeting Housing Needs
4. Environmental Sustainability
  - Corporate Priorities: Protecting the environment
  - Local Plan Chapters: Green Infrastructure & Biodiversity; Sustainable Design & Construction; Environmental Protection; and Sustainable Transport.

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

2.47 Located at the heart of the Gatwick Diamond, Crawley is the major economic driver for the region. Through its Economic and Regeneration Programmes, the ambition is to create a dynamic business growth hub with a bold and vibrant community heart for Crawley and the Gatwick Diamond, driving a diverse retail and leisure offer, excellent public realm, sustainable transport infrastructure, high quality town centre living and a thriving evening economy.

2.48 Through the Crawley Growth Programme, an investment package of £31.412 million has been secured, funded by the Coast to Capital Local Enterprise Partnership (LEP), West Sussex County Council and Crawley Borough Council. This delivering a range of infrastructure improvements and physical regeneration in the town centre, Manor Royal and Gatwick, designed to support significant increases in new homes, business investment and employment growth. The whole programme will deliver 7,000 new jobs, 135,000 square metres of refurbished commercial floor space and 1,000 new homes. Forming part of this work, the Town Centre Regeneration Programme has secured £18 million investment from the Coast to Capital LEP and has already delivered significant improvements to Queens Square and Queensway, with further investment to come through regeneration at Station Gateway and Eastern Gateway. Significant work is also being undertaken through the Crawley Employment and Skills Programme (2019-2024), focused on bridging the local skills gaps by working with partners to create the right conditions for career opportunities within the borough.

### **Zero Carbon Neutral Commitment**

- 2.49 Crawley Borough Council declared a Climate Emergency by a unanimous vote at Full Council on 17 July 2019. This pledged to reduce carbon emissions generated by Crawley Borough Council activities by at least 45% by 2030 and to zero by 2050 as recommended by the Inter-governmental Panel on Climate Change (IPPC).
- 2.50 This improves the Crawley Carbon and Waste Reduction Strategy (adopted 2012) which aims to make Crawley carbon neutral and zero waste by 2050, by focusing on the council:
- being a role model for sustainability within its own buildings and in its service delivery; and
  - working in partnership to help residents and other organisations to limit their own carbon emissions and waste.
- 2.51 The key strategic objectives and aims which are related to the planning system and the priorities and policies in the Local Plan are as follows:
- Low carbon, decentralised energy network for the town:
    - work in partnership with energy service companies, property owners and other partners with the aim of delivering combined heat and power schemes where possible.
  - Promote sustainable housing and transport within Crawley:
    - Investigate opportunities, in partnership with West Sussex County Council;
    - Set an example with the council's own social housing stock;
    - Significantly increase the number of residents walking, cycling and using public transport for more every-day journeys.

### **Crawley Transport Strategy**

- 2.52 The emerging Crawley Transport Strategy seeks to identify opportunities for Crawley for developing a more attractive and practical transport infrastructure that works for everyone, whether or not they drive and whether or not they are able-bodied, and will look at developing access to work, education, shopping and leisure that is easier, more affordable and healthier.
- 2.53 The Crawley Transport Strategy is set within the context of the West Sussex Local Transport Plan which establishes the following objectives for the county:
1. Promoting economic growth
  2. Tackling climate change
  3. Providing access to services, employment and housing
  4. Improving safety, security and health.
- 2.54 The government's Cycle and Walking Investment Strategy was published in 2017, with the aim to double the numbers of cycling trips and significantly increase walking by 2025. Reflecting this, a draft Crawley Local Cycle and Walking Infrastructure Plan (LCWIP) has been prepared and has been subject to public consultation.

### **Neighbourhood Plans**

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



## Sustainable Development

### Presumption in Favour of Sustainable Development

- 3.1 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development<sup>22</sup>, and sets out the planning system's role in supporting the three dimensions of sustainable development:
- **An economic objective:** to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
  - **A social objective:** to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
  - **An environmental objective:** to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

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

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

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

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

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

<sup>22</sup> National Planning Policy Framework, paragraph 7 (2019) MHCLG

### **Reasoned Justification:**

- 3.2 *Taken as a whole, the principles and policies set out in this Local Plan for Crawley will deliver the sustainable development of the town and will guide development proposals to meet the long-term vision as well as maximising short-term benefits. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that guide how the presumption should be applied locally.*
- 3.3 *This must be achieved having regard to the limited availability of developable land in Crawley, which is a result of the borough's tight administrative borough boundary and constraints including flooding and aircraft noise. This means that the Local Plan must strike a considered balance between conflicting demands to meet Crawley's significant housing, employment, and open space needs in a sustainable manner. To ensure this is the case, Policy SD1 provides the overarching principles on meeting the presumption in favour of sustainable development.*
- 3.4 *In accordance with the NPPF, the presumption in favour of sustainable development applies unless specific policies indicate development should be restricted. Those sites with strongest weight against development<sup>23</sup> will include land designated as Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets (including Listed Buildings, Conservation Areas, Scheduled Ancient Monuments and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to scheduled monuments), locations at risk of flooding and irreplaceable habitats, such as areas of Ancient Woodland and ancient and aged trees<sup>24</sup>. Other constraints which have been locally assessed within Crawley include areas subject to unacceptable levels of noise, particularly from aircraft; historic parks and gardens; Local Wildlife Sites; structural landscaping; and open space which has not been identified as surplus to open space requirements. Development within these locations will be considered carefully against the reasons for their designation and will only be approved if mitigation measures can adequately reduce the negative impacts of development.*
- 3.5 *To ensure development is truly sustainable and supports the needs of economic growth within such a constrained and tightly drawn urban borough, it is essential for Crawley to be considered in its wider geographical context, including its housing market and travel to work areas, rather than restricted to its administrative boundaries, and for continued cooperative working to ensure the most appropriate balance is struck.*

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

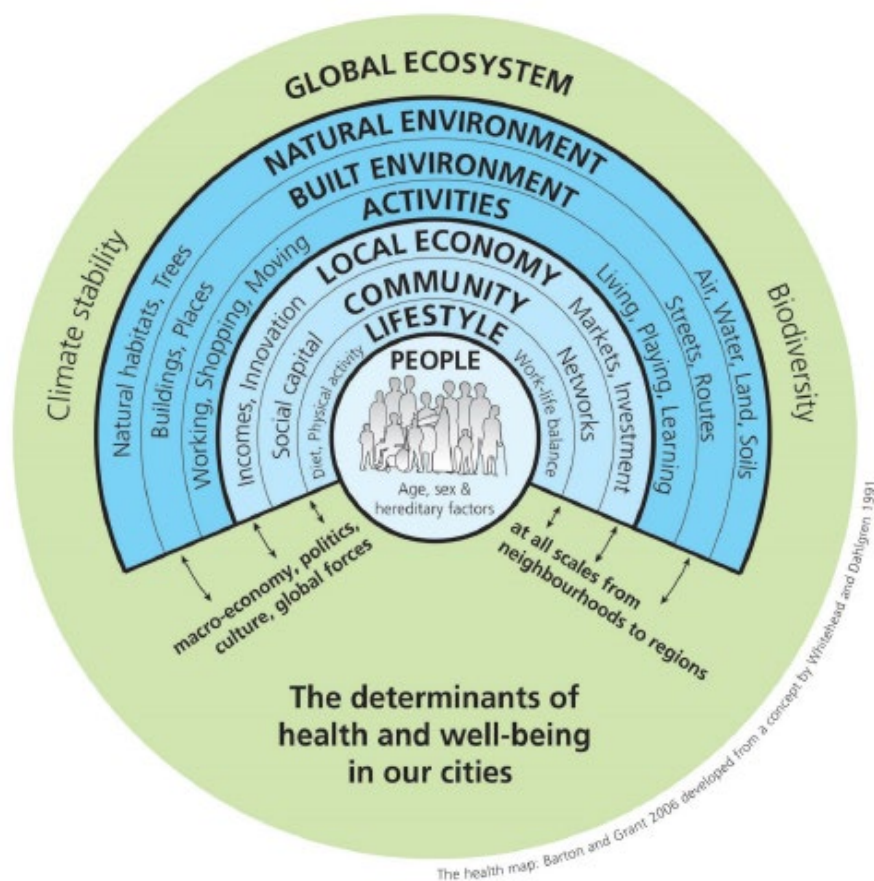
- 3.6 There is now a strong evidence base that our health is impacted by the environments and places within which we live. Government planning policy is explicit that 'planning for health', achieving healthy and safe places is a material consideration to enable and support healthy lifestyles to address identified local health and wellbeing needs. Creating and enabling healthy places and improving the wider determinants of health can help to promote good health, better lifestyles, prevent poor health and have a positive impact on reducing health inequalities.
- 3.7 The Covid-19 pandemic has brought health inequalities into clear focus, highlighting these issues and demonstrating the critical importance of people's living environment, availability of private and public open space and access to local facilities in supporting healthy lifestyles.

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<sup>23</sup> National Planning Policy Framework, paragraph 11 and footnote 6 (2019) MHCLG

<sup>24</sup> National Planning Policy Framework, glossary definition "Irreplaceable habitat", page 67-68 (2019) MHCLG

- 3.8 To aid understanding of the built and natural environment and health, researchers<sup>25</sup> have devised the Health Map (Figure 3). The map is focused on the role of neighbourhood and planning, and emphasises the importance of the built and natural environment's contribution to health and wellbeing outcomes, in line with the socio-ecological approach to health (Orme et al., 2010).



**Fig 3: Barton and Grant Health Map**

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

<sup>25</sup> Barton and Grant (2006), drawing upon the work of Dahlgren and Whitehead (1991)

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

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

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

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

- Meet the principles of good urban design and support Crawley's status as a Dementia-Friendly Town, through ensuring legibility of layout, materials and design (Policies CL2 and DD1);
- Meet the needs of all through the use of the highest standards of accessible and inclusive design (Policy DD2);
- Provide opportunities for high quality open space, play and recreation (Policies OS1 – OS2);
- Prioritise the use of accessible and reliable sustainable transport and active travel through providing greater levels of safe and attractive opportunities for active travel (Policies OS3, ST1 – ST2);
- Be supported by, and not result in a loss of, necessary infrastructure provision (Policies IN1 – IN2);
- Ensure proposals are safe for future site users and do not result in unacceptable harmful impacts (Policies EP1 – EP6); and
- Ensure proposals incorporate biodiversity and green infrastructure which enable climate change resilience (Policies GI1 and GI3).

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

### **Reasoned Justification**

- 3.12 *National planning policy confirms that planning policies and decisions should aim to achieve healthy, inclusive and safe places which: promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy and safe pedestrian and cycle connections within and between neighbourhoods, and active street frontages<sup>26</sup>.*
- 3.13 *To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*
- *Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments<sup>27</sup>;*
  - *Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*
  - *Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to day needs.*
- 3.14 *The Health and Social Care Act (2012) sets out local authorities' new duties and responsibilities for health improvement and health protection. The Act requires every local authority to use the levers at its disposal to improve health and wellbeing. Through the Sustainability Appraisal, the health impacts of the Local Plan are assessed against the identified issues. The benefits and outcomes of the implementation of the Plan will be monitored annually against these indicators through the Authority's Monitoring Report.*
- 3.15 *Planning for health involves thinking about the interrelated factors that affect health, including social and psychological elements, such as wellbeing and fulfilment. The wider determinants of health are conditions in which people are born, grow, work, live and age, and the wider set of forces and systems shaping the conditions of daily life. A healthy place is one that can contribute to the prevention of ill health and provide the environmental conditions to support positive health and wellbeing.*
- 3.16 *The West Sussex Joint Strategic Needs Assessment (JSNA) "People and Places" for Crawley (2019)<sup>28</sup>, highlighted the following characteristics to consider:*
- *There has been a 10% increase in residents since 2007, due both to more births than deaths and inward migration;*
  - *133,425 people were registered with Crawley CCG GP practices in 2017/18 (more than the 111,700 total residents within the borough);*
  - *The resident population has a younger profile compared with England with 22% aged 0-15 years and only 13% aged 65+ years, although the numbers of the elderly population are increasing;*
  - *28% of the local population were from black and minority ethnic (BAME) groups at the time of the last census (2011), higher than England;*
  - *83.3% of the adult population are economically active (2017-2018) and the borough has a very high ratio of private sector jobs to public sector jobs;*

<sup>26</sup> National Planning Policy Framework p27, paragraph 91a) (2019) MHCLG

<sup>27</sup> National Planning Policy Framework p27, paragraph 92 a), b), c) (2019) MHCLG

<sup>28</sup> <https://jsna.westsussex.gov.uk/updates/west-sussex-jsna-summary-2018/>



- Deaths (under 75 years) from cardiovascular disease have fallen over the last 10 years, although the rate of decline has slowed in recent years.
- 3.17 *The West Sussex Joint Strategic Needs Assessment (JSNA) highlighted the following health challenges for Crawley:*
- There are 14,900 people aged 65+, a number which is increasing more quickly;
  - The rate of violent crime in Crawley has increased in the last 5 years;
  - Life expectancy has increased but considerable inequalities persist, with a notable gap between the richest and poorest particularly in relation to men. Life expectancy is lower for people with mental health problems and for people with learning disabilities;
  - Approximately 18% of Year 6 pupils (10/11 year olds) are obese;
  - In 2016/17 62% of adults were estimated to be physically active (doing 150 minutes of moderate intensive exercise per week) and 24% physically inactive (<30 minutes of moderate intensive activity).
- 3.18 *Proposals should consider and reflect the expectations of the West Sussex Joint Health and Wellbeing Strategy and the Sustainability Transformation Plans published by Crawley’s local NHS/CCG partnership. Reference should be made to the Sport England and Public Health England’s Active Design guidance<sup>29</sup>, which sets out established guidance on how the design and layout of new developments can be planned to make communities more active and healthier. This includes “Ten Principles of Active Design”:*
- |  |  |
|--|--|
| <ol style="list-style-type: none"> <li>1. Activity for all;</li> <li>2. Walkable communities;</li> <li>3. Connected walking and cycling routes;</li> <li>4. Co-location of community facilities;</li> <li>5. Network of multifunctional open space;</li> </ol> | <ol style="list-style-type: none"> <li>6. High quality streets and spaces;</li> <li>7. Appropriate infrastructure;</li> <li>8. Active buildings;</li> <li>9. Management, maintenance, monitoring and evaluation;</li> <li>10. Activity promotion and local champions.</li> </ol> |
|--|--|
- The Essex Design Guide<sup>30</sup> should be considered against Crawley-specific circumstances and taken as a baseline for implementing the Ten Principles of Active Design into specific design guidance to help to activate spaces, including in relation to the specific advice in relation to planning and designing new developments with regards to the needs of the aging population and establishing health and wellbeing in order to help people achieve and experience better quality lifestyles.*
- 3.19 *Health Impact Assessments (HIA) and screening should be undertaken for all major applications and developments likely to give rise to significant health impacts. This should draw together the health benefits of the other application submission documents, including the design and access statement, design code, transport assessment and travel plan. This will allow schemes to be refined to maximise positive effects on health and wellbeing. Proposals should draw on good examples of best practice elsewhere, including, for example, healthy new towns, garden villages and communities, obesity trailblazers, London superzones, local delivery pilots, in order to design schemes within Crawley to meet the identified needs of the borough. When considering the health impact of individual developments, it is important that its surroundings are taken into account as well as its intended purpose. This includes uses involving vulnerable communities and sensitive uses, such as residential care homes, supported housing, schools, hospitals and health centres.*

<sup>29</sup> <http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>

<sup>30</sup> <https://www.essexdesignguide.co.uk>

## Wellbeing & Communities

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

*By 2037, Crawley will be a place that people want to visit, to have fun and spend their leisure time. As a town within a countryside setting that is very much valued by local people, it will be safe and well cared for. The rich heritage which has shaped what the town is today will be respected, protected and enhanced.*

*Local communities will be directly involved in planning how the town grows and develops in order to achieve the best outcome for all concerned; particularly where difficult choices have to be made. Neighbourhoods will continue to offer local facilities and amenities that can be easily accessed along with informal green spaces for all to enjoy. The spirit and pride of individual communities will continue to be harnessed to make neighbourhoods the focus of local celebration. People will be encouraged to stay physically and mentally fit and active, high standards of health care will be delivered locally and people will be able to age with confidence as they grow older. Crawley's parklands and open spaces, its sporting and leisure facilities, along with its cultural offer, will be enhanced for the benefit of local people and visitors.*

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

*Neighbourhoods will continue to feature in the development of the town, recognising the important role they play in helping shape and develop communities. Growth will be sustainable and supported by an infrastructure plan that complements development enabling people to live a long and happy life. All people who live here will be proud, confident and self-reliant, working together and with others for the good of the town. Crawley will continue to improve the quality of life for its residents throughout every stage in their life. Excellent early years' provision will support children's development, which will be further assisted by the provision of good primary, secondary, further and higher education. Education, for both young and old, should unlock potential, giving people a real choice about what they do in their working life.*



## Character, Landscape & Development Form

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

### Chapter Content

- 4.5 This chapter sets out policies to guide the overarching design and form of all new development, the relationship between development proposals and key elements of Crawley's character, including urban and rural context, and the general planning policy considerations for development outside the Built-Up Area Boundary. More detailed design policies are set out in the subsequent chapter: 'Design & Development Requirements'.

### The Key Issues

#### Neighbourhoods

- 4.6 The neighbourhoods are a key feature of the planning and development of Crawley and represent a sustainable form of development. The principles contained in the original Crawley masterplan which underpinned the layout of each successive neighbourhood continue to reflect government guidance, particularly with regard to meeting local needs by focusing shops, schools and other community services and facilities in locations accessible by sustainable transport in the heart of each neighbourhood.
- 4.7 As a New Town, much of Crawley's built environment has been constructed over the last 60 years. However, there is increasing recognition of the value of some of the "New Town" buildings and spaces that have been built since 1947. Many of these assets are locally distinctive and it is of importance to have a clear approach for enhancing and protecting them. This may include their group value, as well as the spaces between the built form, the setback from the highway, and the existing soft landscaping, which all contribute to the valued sense of place and local distinctive character of Crawley. These will be recognised in considering new development proposals which come forward.





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**Fig 4: Crawley Neighbourhoods**

**Character**

- 4.8 In January 2020, the Ministry of Housing, Communities & Local Government (MHCLG) published “Living with Beauty”, the final report of the Building Better, Building Beautiful Commission (BBBCC), setting out its recommendations to the government and raising some concerns about the quality of post-war development.
- 4.9 This concern is particularly relevant and timely when considering the NPPF’s requirements and emphasis in regard to the efficient use of land and increasing densities, and the importance of how new development should maintain and be grounded in an understanding and evaluation of each area’s defining local character and history. The NPPF<sup>31</sup> states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. The identification and understanding of local character is the essential first design and planning step to altering and reversing these disillusioning development outcomes.
- 4.10 In October 2019, the government published a new National Design Guide (NDG) entitled “Planning practice guidance for beautiful, enduring and successful places”. This states:

<sup>31</sup> National Planning Policy Framework (NPPF), Chapter 12, paragraph 130 (2019) MHCLG

*“A place is more complex and multi-faceted than a building:*

- it is a setting for a diverse range of uses and activities, and is experienced by many people in many different ways;*
- it is made up of buildings, and also landscape and infrastructure, which are likely to endure longer than the buildings themselves;*
- most places evolve over a long period of time once they have been established, with many incremental changes that can affect their quality;*
- the quality of ‘delight’ includes a richness of experience gained from all of our senses, not only the visual; and*
- beauty in a place may range from a long view down to the detail of a building or landscape”<sup>32</sup>.*

- 4.11 The NDG addresses the question of how we recognise well-designed places in the form of ten characteristics<sup>33</sup>, covering themes of character, community and climate. These ten characteristics work together to create the physical character of a place and are addressed in this Local Plan. This Chapter introduces a number of key policies, which address the NDG’s characteristics and the concerns raised by the BBBBC including key foundational steps to guide and direct the form of new development from the outset. This is particularly important as Crawley is a growing town with constraints on development set within a tight administrative boundary. This presents challenges, not least in terms of finding appropriate sites for the new development and infrastructure that is needed to support the town in the future. With significant development needed over the next 15 years, it is essential that the locally distinctive features that contribute positively to the town’s sense of place are recognised, protected and, where possible, enhanced.

#### Effective Use of Land

- 4.12 The effective use of land is an important objective in making development more sustainable. As such, it is embedded in government policy. Compact development not only uses less land, but it also has the potential to create efficiencies in the use of other resources, including energy supply, services and transportation and to allow better provision of open space. It is important that land is used effectively, particularly given the limited land supply in the borough.
- 4.13 The NPPF is clear that in setting new policies, plans must contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This should include the use of minimum density ranges with higher densities expected particularly in Crawley Town Centre and other locations which are well served by high frequency, reliable public transport (see Policy CL3). In such locations, major new development should seek a significant uplift in the average residential densities (as outlined in Policy CL4), unless it can be shown that there are strong reasons why this would be inappropriate.
- 4.14 Today Crawley’s residential neighbourhoods are characterised predominately by two-storey, family-sized homes; all built meeting established internal and external space standards. In seeking higher densities for the borough, compromising the town’s character, reducing quality of life for residents and creating town cramming, will still not be accepted.
- 4.15 Building at higher densities can make more efficient use of land and also deliver high quality development. However, higher densities can produce a poor quality environment and generate negative public perceptions. Higher residential densities can be successfully achieved in lower rise developments which use innovative ways of providing outdoor amenity space. Many of England’s best urban areas are widely

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<sup>32</sup> National Design Guide (NDG), Chapter 5, page 3 (2019) MHCLG

<sup>33</sup> NDG, Part 2 (2019) MHCLG

seen as attractive places in which to live, yet have a compact form and relatively high density.

- 4.16 Good examples of compact forms of development within Crawley include its Conservation Areas, such as St Peter's, Brighton Road and Ifield Village, as well as more recent developments, such as the Commonwealth Drive scheme at Three Bridges. In terms of layout, design and residential amenity, compact development requires more thought, expertise and craft than is usually applied to low density development. A far greater quality of architectural design, attention to detailing, materials and consideration of the needs of future occupants is needed. Crucially, compact development form needs to be carefully stitched and moulded into its surroundings, guided by the existing character of an area. The NPPF states that: *"In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings"*<sup>34</sup>.

#### Landscape Character

- 4.17 Trees and areas of landscaping form a central part of Crawley's New Town heritage. As development pressures increase and development land within the urban area becomes scarce, it is critical that this land is protected and improved and used to secure multiple benefits. Consideration should be given to the key role of structural landscaping and strategic views in order to maintain or improve the character of Crawley.
- 4.18 Crawley's countryside is an extremely valuable leisure, amenity and environmental asset for the community, which should be conserved and enhanced in a positive way. This must be integrated with the need to achieve the Plan's wider vision and objectives to support sustainable development within the countryside.

### Local Plan Policies

#### Neighbourhood Principle

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

#### Strategic Policy CL1: Neighbourhood Principle

The neighbourhood principle will be protected and enhanced by:

- a) maintaining the neighbourhood structure of the town with a clear pattern of land uses and arrangement of open spaces and landscape features. Development within the neighbourhoods should mainly be residential, in-keeping with the existing neighbourhood. Mixed use and higher density development may be compatible with the existing structure of the neighbourhood, particularly if it is situated in sustainable locations such as their neighbourhood centres;
- b) ensuring the neighbourhood centres remain the focal point for the local community, providing facilities that meet their day-to-day needs within walking distance; and

<sup>34</sup> National Planning Policy Framework, Chapter 12, 'Achieving well-designed places' (2019) MHCLG

- 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.

### **Reasoned Justification**

- 4.20 *The NPPF places a particular onus on the promotion of healthy and inclusive communities. Attention is drawn to the role that planning can play in bringing people together, promoting sustainable development, and taking an integrated approach to the location of housing, economic uses, and community services and facilities. The neighbourhood principle continues to represent the most sustainable approach to meeting these objectives.*
- 4.21 *Therefore, the role of the neighbourhood centres will be protected and enhanced. Uses which meet the day-to-day needs of residents and generate local trips, including shops, community uses, small employment premises and schools, will continue to be focused in locations which are most accessible by foot, cycling and/or public transport. The proximity and mix of uses and the ease of accessibility also contributes to the character of the centres by creating a focus of activity.*

### **The Form of New Development: Urban Design Principles**

- 4.22 Successful, sustainable places share a number of characteristics based upon key urban design principles. Crawley Borough Council will apply these principles to all development proposals. New development can influence whether successful places are created, retained or enhanced, whether the schemes are strategic, creating new streets and spaces, or smaller but affecting an existing place, for example by providing natural surveillance over an unsupervised path.

#### Existing Local Character

- 4.23 Many definitions are used to define what people perceive as the character of an area, such as sylvan, rural, suburban, Victorian, high street, leafy and terraced. However, these definitions are not enough on their own to define the character of a place. Behind these labels there is a less obvious physical skeleton, or rural/urban structure, underpinning every area. This structure consists of tangible physical elements (e.g. paths, landmarks, roads, an edge of woodland, views and vistas), which together give a place its distinct form. In order to guide the form of new development, these key components need to be defined accurately. Their identification clarifies how and why people experience, appreciate and enjoy a place.

#### The Form of New Development

- 4.24 Form refers to how places have arisen, are arranged and designed. This applies to both landscape and built form both in an urban and rural context. Form identifies and defines the relationships, shape and size of buildings; landscape patterns and features; structures, routes/paths, typology and spaces; and how places are arranged. The NPPF sets out that achieving high quality places and buildings is fundamental to the planning and development process and that it also leads to improvements in the quality of existing environments.
- 4.25 Buildings are an important component of places. However, their good design involves careful attention to other important components of places, including those beyond the development site boundary, in effect understanding the wider context. A well-designed place is unlikely to be achieved by focusing only on the appearance, materials and detailing of buildings; instead it comes about through making the right choices at all levels.

## Strategic Policy CL2: Making Successful Places – Principles of Good Urban Design

To assist in the creation, retention and/or enhancement of successful places, applications must demonstrate that the form of new development proposals has addressed the following principles:

### 1. Existing Character

All new development must identify, respond to and be based upon a thorough understanding of the significance and distinctiveness of both the site and the wider area's existing character. All proposals should demonstrate they have considered the council's relevant character and heritage assessments as a starting point for the design assessment.

For major applications, proposals must demonstrate and document how the components of existing rural/urban structure, movement patterns, individual landscape/built assets and topography have guided and directed the form of new development. Proposals must be dictated to and directed by these various elements, setting out a clear design vision which builds upon, protects, reinforces and enhances the existing character, while not preventing or discouraging appropriate innovation or change (such as increased densities).

### 2. Effective Use of Land

All new development must identify, test, determine and (where appropriate) embrace opportunities for increased density.

### 3. Built Form, Layout and Movement

In considering the layout, scale and arrangement of buildings or streets, all new development must:

- i. demonstrate how all the components and characteristics of place have been considered to create a well-designed proposal;
- ii. demonstrate how places are experienced and make connected places that are permeable for people and wildlife; and
- iii. optimise orientation, solar gain and aspect.

Major applications must:

- a) ensure the proposed urban structure results in movement paths and corridors which are determined by where people want to go within and beyond the development, taking advantage of direct desire lines as much as possible;
- b) provide recognisable spaces and routes that are attractive, safe, uncluttered and which work effectively for all in society, including disabled and elderly people. Intersections and landmarks should be used and designed to help people find their way around and create places that are legible and easy to read;
- c) create continuous frontages onto streets and spaces enclosed by development which clearly define private and public areas and ensure streets, footpaths and open spaces are overlooked by buildings; and
- d) ensure movement corridors and the placing of new development take account of long distant vistas, landmarks, views into and out of adjoining areas, gateways to and between particular areas, and focal points.

Illustrative tools, such as accurate 3D views modelling, should be used to show major proposals in relation to the existing setting/context, particularly from a street level perspective.

### **Reasoned Justification**

- 4.26 *An unprecedented number of densification, intensification and infill development projects as well as new planned urban extensions are occurring across big cities and*

towns throughout the UK, and Crawley is no exception. New urban characters are being introduced near, alongside and within established neighbourhoods, at a fast pace. Policy CL2 aims to ensure the positive characteristics and qualities of a place are articulated, defined and understood.

- 4.27 *The impact of development on the existing character of an area is complex and it needs to be considered through varied lenses. Existing character assessment is required in order to produce a vital evidence baseline and study. Character Assessments should bring together as many aspects of a place as possible in order to appreciate and understand it better. They will provide an understanding of the local context and an analysis of local character and identity to guide and dictate the form of new development. The extent, content, analysis and conclusions reached will vary and overlap across differing areas.*
- 4.28 *In 2009, the council completed a baseline character assessment of the town to help define its sense of place and this should be considered to inform the design of development proposals<sup>35</sup>. While the council is bringing forward full area wide character assessments, this existing evidence will help provide an initial understanding of local context and identity. However, should the relevant full, detailed assessment not be completed where a development is proposed, developers will be expected to support us in their delivery. The 2009 assessment identified broad character areas and positive features that should be protected and enhanced, including the green setting of the town and the quality of particular buildings and views. The assessment used key urban design principles to assess the quality of areas drawn from the DETR publication “By Design – Urban Design and the Planning System”. This was supported by a Heritage Assessment of some of the key heritage and character areas within the borough, carried out in 2010<sup>36</sup> (reviewed in 2020). Some of the places identified are now designated as Conservation Areas and Areas of Special Local Character (ASLC’s). These areas are identified in this Local Plan Chapter 6: Heritage.*

#### Well-Designed Places:

- 4.29 *“Well-designed places and buildings come about when there is a clearly expressed ‘story’ for the design concept and how it has evolved into a design proposal. This explains how the concept influences the layout, form, appearance and details of the proposed development. It may draw its inspiration from the site, its surroundings or a wider context. It may also introduce new approaches to contrast with, or complement, its context. This ‘story’ will inform and address all ten characteristics. It is set out in a Design and Access Statement that accompanies a planning application”<sup>37</sup>. Taking account of Government guidance<sup>38</sup>, the council considers good design utilises the following key urban design characteristics:*

##### *1. Context*

*Good design should enhance its surroundings through a character-directed design process. This prompts an area specific, bespoke design approach to each site. This is fundamental to all decisions made in relation to the form of new development. However, this does not mean that appearance, scale, density, height, massing and form of new developments need to be the same as the surrounding area.*

*The identification of individual components that contribute positively to existing character is dependent on an accurate evidence base, including heritage assessments, landscape and visual constraint analysis, identification of the existing*

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<sup>35</sup> Crawley Baseline Character Assessment (2009) EDAW/AECOM

<sup>36</sup> Crawley ASEQs and Locally Listed Buildings Heritage Assessment (2010) Alan Baxter

<sup>37</sup> National Design Guide, page 16 (1 October 2019) MHCLG

<sup>38</sup> National Design Guide (2019) MHCLG

rural and urban structure, areas of special environmental quality, key views, and pedestrian rights of ways and desire lines.

*It is possible to identify and chart the physical elements, as well as the more elusive perceptions and experiences, of a place, which all work together to form an area's character. Analysing and understanding existing form is the key to defining character. The identification of the rural/urban structure will help to accurately detect the significance and distinctiveness of any given site and the wider spirit of a place. To successfully achieve this, it is necessary to pinpoint the position, function and extent of various character components; identify how any existing site and local area is experienced, perceived and enjoyed; and establish a key set of diagrams of fixed parameters which direct and guide the form of new development.*

## **2. Identity**

*Good design should be attractive and distinctive. It should be based on an understanding of the identity of the place within which it is located, including:*

- *The relationship between the natural environment, landscape and built development: underlying landform, patterns of built form, the street pattern, their proportions and landscape features; environmental and heritage assets and their settings; the proportions of buildings framing spaces and streets.*
- *The identity of a place including locally distinctive patterns, the local vernacular, and other landscape and architectural features that contribute to local character.*
- *How places are experienced and perceived by both residents and visitors.*

*Baseline Character Area Appraisals should identify context and identity.*

## **3. Built Form**

*New development should provide and maintain a coherent pattern of development, through clear consideration given to its Layout (Urban/Rural Structure; Urban Grain, Density and Mix); Scale (Height and Massing of buildings and spaces; Building Type, Density, Façade and Interface); and Appearance (Details and Materials; Façade and Interface and Building Type).*

*This should build on the following components of structure: movement routes; linear boundaries; character areas; strategic points; and landmarks.*

## **4. Movement**

*New development should be accessible, clear and easy to move around within as well as to and from. In particular attention should be provided to Movement Patterns (Streetscape and Landscape; Separation aspects, such as Connectivity, Permeability and Legibility).*

*Movement is one of the most significant elements of form. People observe the countryside or urban environment while moving through it, along streets, lanes, public rights of way or across open space. It is along, and from, these paths that the other four structural components (Layout, Scale, Appearance and Public Realm) are arranged, viewed and relate to one another. Different modes of transport and speed dictate the layout, scale, appearance and environmental quality of new development adjoining movement corridors. For example: the setting and form of development adjacent to a 40mph vehicular path is impacted very differently to that situated alongside a pedestrian-only path or a vehicular 20mph traffic street.*

## **5. Nature**

*Opportunities for nature to be enhanced and optimised through new development should be taken in line with the principles and requirements of the NPPF requirement to enhance biodiversity, and the Local Plan requirements on Green Infrastructure connectivity and Biodiversity Net Gain (Policies GI1 and GI3).*



## 6. Public Spaces

*Public spaces should be safe, social and inclusive. In addition to its location, shape and scale, detailed design elements of the Public Realm must be carefully considered (Streetscape and Landscape; Details and Materials; Façade and Interface).*

*The quality of the spaces between buildings is as important as the buildings themselves. Public spaces are streets, squares and other spaces that are open to all and they are the setting for most movement. The design of a public space encompasses its siting and integration into the wider network of routes as well as its various elements. These include areas allocated to different users – cars, cyclists and pedestrians<sup>39</sup>. Successful spaces and streets contribute to the quality and character of a place, not just how it functions.*

## 7. Uses

*Uses should be mixed and integrated, where these are complementary and can be designed to mitigate against any potential significant conflict (Policies DD1 and EC11. Active and engaging frontages should be sought in appropriate locations (Policy TC4).*

### Illustrative Tools:

- 4.30 *In order to assess and communicate the quality and impact of large new development form, accurate views from key points are essential. Chosen views must be from a realistic street level position (i.e. average adult eye height). Accurate photo-montaged images which include adjoining/retained context should also be included to aid visual communication.*

## **Compact Development, Layout and Sustainable Movement**

- 4.31 Good urban design is sustainable design. Urban form and structure have a major influence on climate change. There is a crucial relationship between form and space, buildings, energy, movement patterns, land take and location. As the National Design Guide states:  
*“Compact forms of development bring people together to support local public transport, facilities and local services. They make destinations easily accessible by walking or cycling wherever this is practical. This helps to reduce dependency upon the private car”<sup>40</sup>.*  
*“Patterns of movement for people are integral to well-designed places. They include walking and cycling, access to facilities, employment and servicing, parking and the convenience of public transport”.*
- 4.32 Sustainable urban design is not just about changing the way places look but about making places work better. Good design should be based on an understanding of movement patterns around which appropriate uses can be located and then suitable densities determined (see Policy CL4). Choices made in relation to the layout and scale of new development strongly influence everyday human activity, particularly in relation to movement which dictates how people move within, through and around a place. As a result it has a major influence on climate change. Government policy makes it clear that higher residential densities, public transport and sustainability are all interconnected and that they rely upon one another in order to achieve an increase in the supply of residential units.
- 4.33 Higher levels of sustainable residential density depend on a one key infrastructural foundation in particular: fast, reliable, frequent and high capacity public transport.

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<sup>39</sup> National Design Guide, page 30 ‘Public Spaces’ (1 October 2019) MHCLG

<sup>40</sup> National Design Guide, page 19, 63, ‘Compact form of development’ (1 October 2019) MHCLG

Crawley already has some of this transport infrastructure in place with key bus and rail routes and interchanges.

### Policy CL3: Movement Patterns, Layout and Sustainable Urban Design

All development should seek to:

1. Use land more efficiently and sustainably, integrate land uses and transport networks. It should build upon, connect to, enhance and extend sustainable movement, in turn maximising opportunities for compact development and sustainable travel and increased levels of sustainable transport modal share.
2. Put people before traffic and encourage walking and cycling through establishing a layout of pathways which:
  - i. Understand and respond to the wider borough pattern of movement, demonstrating how walking and cycling connections will enhance and integrate schemes with Crawley Town Centre, local centres, transportation hubs, schools and employment areas.
  - ii. Connect new development to areas of rural open space and/or large urban areas of green open space and ensure new route alignments follow direct desire lines as much as possible allowing for through routes to be straight and direct, providing clear, legible and obvious linkages to adjoining areas.
  - iii. Ensure that buildings are orientated to overlook movement corridors in order to provide passive supervision and safety.

In addition to the above, larger schemes will be required to establish a development form based on sustainable compact layout and scale. These must:

- a. Be planned and located adjacent to stations, stops or interchanges along existing segregated, high capacity, high frequent public transport corridors; and
- b. Be designed and laid out to ensure future residents and users are within eight minute walking distance of such rail stations or bus stops.

#### **Reasoned Justification:**

4.34 *The commercial viability of frequent and reliable public transport depends on compact development and minimum densities (see Policy CL4). Compact neighbourhoods provide a more substantial and reliable customer base for public transport services. In turn, frequent and reliable services encourage a shift away from private car use, Research<sup>41</sup> suggests net densities of 60 dwellings per hectare are necessary to sustain a dependable, frequent and high capacity public transport service, such as currently exists in Crawley along sections of the Fastway bus network. The borough's existing key corridors, access points and interchanges include:*

1. *Crawley Town Centre rail and bus station hub.*
2. *Two high frequency, quality bus corridors, running north/south along Fastway bus Route 10, including Routes 20 and 100, as follows:*
  - a. *Where Route 20 aligns with 10, all stops between Gatwick Airport and the Gatwick Road North stop; and all stops between the Southgate Avenue south of station way top and to Broadfield Barton stop;*
  - b. *Where Fastway Routes 10 and 100 intersect; the Manor Royal Centre stop, and in the Town Centre, Crawley Bus Station and the Broadway.*
3. *Gatwick Airport and Three Bridges rail stations.*
4. *Gatwick Airport coach station.*

<sup>41</sup> Urban Design Compendium, page 47 (HCA 2013 and English Partnerships 2007)

- 4.35 *Too often permeability and connectivity is treated as an afterthought leaving new development isolated with minimal or disjointed linkages to the wider sustainable transport network and reliant only on the car. New development should be seen as an opportunity to integrate improvements to active travel and public transport corridors. Whether strategic or small in size, all new development needs to consider its place and impact within the wider context and should think beyond the site's red lines. This is particularly important, with regard to movement patterns, in establishing walkable neighbourhoods and ensuring new development can optimise and promote modal shift to sustainable alternatives. The smallest development proposals can contribute to improvements, such as enhancing a short link to a footpath, or including a window for natural surveillance over a route.*
- 4.36 *Thresholds for larger development, as referred to in Policy CL3, include new residential development in excess of 80 units, or other types of development as per the thresholds outlined in the Local Validation Checklist: for example, hotels, 100 beds or more, 50+ bed hospitals, B1 2500sqm, B2 4000sqm and B8 5000sqm (see Policy ST1).*
- 4.37 *Delivering relatively straight, through routes, particularly for pedestrians and cyclists, is very important. It requires looking both outward to the wider network as well as inward to the site being developed. When a district or movement corridor is well connected it will naturally encourage sustainable movement patterns and reduce the dependence and reliance on vehicular movement. It will also have high pedestrian footfall, which will improve local centre viability and attract local shops and services, closer to where people live and work.*

### **Layout and Scale: Density, Height and Massing**

- 4.38 The NPPF is clear that *"the creation of high quality buildings and places is fundamental to what the planning and development process should achieve"*<sup>42</sup>. Good design is key as it helps make development acceptable to communities. All areas have differing capacities for change and potential for intensification; there are, for example, limited opportunities for change in Conservation Areas and Areas of Special Local Character.
- 4.39 Density is just one aspect of built form. As referred to earlier, building height, block size and building typology all affect the character of an area and the perception of density. Density and mix is concerned with the amount of development, intensity of activity and the associated range of uses. Accessibility, street life, vitality and viability are all impacted differently depending on development scale or levels of density. Many schemes are perceived to be excessively dense, visually inappropriate and generally out of keeping with their adjoining context when they fail to take account of the need for density and form to be appropriate to its context. This does not mean that density, design or unit typology should be the same as the surrounding area, but new buildings need to respect their neighbours.
- 4.40 The creation of high quality buildings and places is fundamental in order to secure more sustainable, compact development across the borough. Compact development and the determination of density ranges must be directed first and foremost by the following two parameters:
1. The existing character of an area: Density and mix, height and massing and proposed urban structure must complement, build upon, retain and protect successful attributes of an area, as outlined in Strategic Policy CL2.
  2. Proximity to sustainable movement or the potential for achieving this (Policy CL3).

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<sup>42</sup> National Planning Policy Framework, paragraph 124 (2019) MHCLG

## Policy CL4: Compact Development – Layout, Scale and Appearance

### Residential Density

Across the borough, in general, a density of at least 45 dwellings per hectare will apply to all residential developments within the Built-Up Area Boundary unless the existing character justifies a lower figure.

In specific locations outlined below, for major applications, proposals must achieve minimum densities in line with the following categories, unless the existing character justifies a lower figure, in order to make the best use of land and encourage modal shift to take advantage of sustainable transport options:

- i. **High density:** A minimum of 200 dwellings per hectare.

Where: Brownfield development sites within eight minutes walking distance of Crawley rail and bus station, Town Centre Fastway stops at the Broadway and Leisure Park and Three Bridges rail station.

- ii. **Medium density:** Within a range of 60 - 200 dwellings per hectare.

Where: Areas of the town with good access to public transport and local facilities but where the established local character precludes the high density, including:

- Within the same distances as (i) above, pre-1947 areas of the borough including Victorian districts, and areas within or affecting the setting of the original New Town shopping precinct;
- Neighbourhood Centres; and
- Areas within eight minutes walking distance of stops along Fastway Route 10, or where a similar or enhanced public transport service is provided in the future.

### **Reasoned Justification**

4.41 *National planning policy emphasises the need to plan for the effective use of land in order to deliver a sufficient supply of homes, and states that strategic policies should make “as much use as possible of previously-developed or ‘brownfield land’<sup>43</sup>... and “promote and support the development of under-utilised land and buildings”<sup>44</sup>. Furthermore, the NPPF identifies that “small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly”<sup>45</sup>.*

4.42 *Density, which will be measured as the net dwelling density in dwellings per hectare<sup>46</sup>, has to be appropriate to context in the first instance. Policy CL1(a) confirms that mixed use and higher density development may be compatible with the existing structure of the neighbourhood, particularly if it is situated in sustainable locations such as their neighbourhood centres. Local Design Standards and area-wide design assessment will inform which options are most appropriate in terms of character and context for different parts of Crawley. Successful extensions of the character of the surrounding area can help create great settings for new development. Policy CL4 establishes a minimum density expectation for the borough of at least 45 dwellings per hectare. This has been reached through an assessment of the town’s existing density levels, considering good practice within the borough and through seeking to achieve a challenging but generally appropriate minimum*

<sup>43</sup> National Planning Policy Framework, paragraph 117 (2019) MHCLG

<sup>44</sup> National Planning Policy Framework, paragraph 118d (2019) MHCLG

<sup>45</sup> National Planning Policy Framework, paragraph 68a (2019) MHCLG

<sup>46</sup> Net dwelling density is calculated by including only those site areas which will be developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children’s play areas, where these are provided

level in order to maximise effective use of land without creating significant harm to amenity and character.

- 4.43 *In all areas (including within those locations specified in the policy to be appropriate for high and medium density levels) the presence of sensitive heritage assets and existing character could mean much lower densities would be required. For example, these may be areas within or affecting the setting of Listed Buildings, Conservation Areas and Areas of Special Local Character or locally listed asset. In such locations, significant adverse impact on sensitive assets would justify not meeting the minimum density levels required by this Policy and development which could potentially cause significant adverse impact on such locations must be carefully designed (in accordance with the Policies set out in the 'Heritage' chapter of this Local Plan).*
- 4.44 *Density is usually expressed in units per hectare. However, whilst density is a mechanism to measure schemes against, no specific design qualities or characteristics are implied. In ensuring reaching higher density levels in Crawley does not result in poor decisions and/or town cramming, it is essential that density is seen as a product of design, not a determinant of it. The council's Densification Study provides greater detail in relation to increasing densities in Crawley to support the implementation of this policy.*
- 4.45 *The way in which a place is designed is more important to its desirability than the measurement of its density. Measured density and perceived density are not necessarily aligned. On the same sized plot, different approaches to urban form and height can achieve the same density. The following three approaches to form are a good example of this:*  
*(1) two and three storey terraced housing; urban form: high site coverage pattern;*  
*(2) three and four storey buildings with varying height, block size and building depth; urban form: medium site coverage;*  
*(3) a high rise tower block; urban form: low site coverage.*
- 4.46 *As is typical of new towns, Crawley was conceived as a lower-mid density town with average densities of 21/28 dwellings per hectare. Many of England's best urban areas and many of Crawley's historic Conservation Areas have a compact form and considerably higher densities*
- 4.47 *In seeking to achieve higher densities, an over-provision of smaller studio and one bed units against the council's housing needs would not be considered acceptable. Policy H4 sets the expected housing mix for schemes within the borough and proposals will be measured against this starting point. Similarly, the council's policies relating to internal and external space standards and accessible and adaptable buildings (Policies DD2 and DD3) will also be required to be met in all new residential developments. The Housing Typology policies (H3 and H3a-H3f) provide some further policy consideration for housing development on a range of sites across the borough.*

### **Masterplanning, Design Codes and Design Review**

- 4.48 A suite of government guidance supports the NPPF objectives outlining and illustrating the government's priorities for well-designed places. Specific, detailed and measurable criteria for the good design of larger applications are most appropriately set out at the local level. This may take the form of further design guidance. In areas where higher density ranges may be appropriate, masterplans and bespoke design codes will be prepared by Crawley Borough Council over time or prepared with the support of applicants to accompany planning applications. A National Model Design Code is due to be published by MHCLG setting out detailed standards for key elements of successful design.

- 4.49 The NPPF highlights the valuable role of Design Review in ensuring high standards of design. Crawley Borough Council recognise how an independent design review of proposals could be advantageous for large or significant applications and this will be discussed with developers should demand arise. Applicants will be required to resource any design review agreed. As is the case with pre-application consultation, early constructive discussions with a peer review process will help the design development process and design quality and presentations, in particular need to outline the challenges of the project brief and the site and the concept approach to the issues outlined in Strategic Policy CL2. A panel would be an advisory body with no formal decision-making powers.

### Policy CL5: Development Briefs and Masterplanning

To support applications for significant developments or sites which could form part of wider development area, Development Briefs and/or Masterplans may be required to illustrate and describe how planning and design policies and principles will be implemented. Pre-application consultation should take place at the earliest opportunity.

At concept design stage, Masterplans should provide indicative and flexible vision for future development form, urban design concepts and options. These should be informed by preliminary technical appraisals and viability testing.

Masterplans must chart overall urban design guidance and intent, specifically:

- i. how a site or series of sites will be developed, implemented and phased;
- ii. setting out principles on matters of importance rather than prescribing design in detail.

### Reasoned Justification

- 4.50 *Various design tools<sup>47</sup> are available which should be used to assist in identifying key components of the context and character of an area or site. Used effectively, this output can in turn help identify and deliver an appropriate new high quality form, both of landscape and structures, private space and public realm. In certain cases, design codes may also need to be developed in order to provide new development with a template within which to design individual buildings.*

*“As with any project, you cannot hope to get what you want at the end of the process if you have not defined what you wanted at the outset and prepared a good brief. The implementation plan should be integral to the preparation of the spatial masterplan; one must inform the other”<sup>48</sup>.*

- 4.51 *If consistent with the Local Plan, and if work has been prepared in collaboration with the local planning authority in accordance with the Planning Regulations, including undertaking a period of appropriate public consultation and sustainability appraisal screening, this work may be adopted formally as a Supplementary Planning Document. Successful masterplans should set out how to create and sustain excellent places for living, work and play. Further detail on Masterplanning definitions, content and process are outlined in depth in CABE’s publication ‘Creating successful masterplans, a guide for clients’ 2008/09.*

<sup>47</sup> Related National Design Guide Definitions:

- A design guide: A document providing guidance on how development can be carried out in accordance with good design practice, often produced by a local authority.
- A design code: A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.
- Design concept: The basic design ideas on which a proposal will be based, often expressed in a combination of words and visual material.

<sup>48</sup> ‘Creating successful masterplans, a guide for clients’ Chapter 32, 2.2 (2008/09) CABE



- 4.52 *This Policy applies to significant developments, which may be smaller developments in highly sensitive locations, or those of a significant scale. It is of particular relevance where schemes may be made up from different sites and where comprehensive development is considered particularly critical. In order to establish whether a scheme would fall into this category at the earliest opportunity, the council expects developers to engage in discussions through the pre-application process for these sites in order to agree the potential need for masterplan.*
- 4.53 *Applications for appropriate schemes may be asked to present to a design review panel.*

### **Structural Landscaping**

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

#### **Policy CL6: Structural Landscaping**

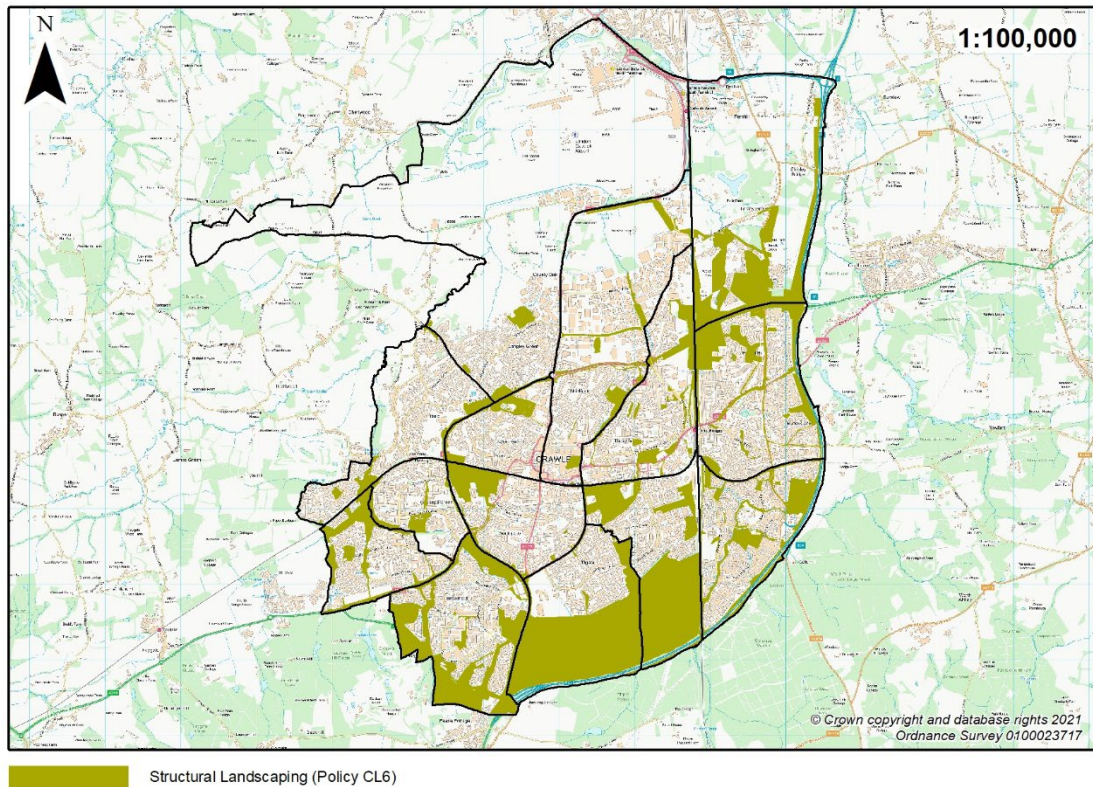
Areas of trees and soft landscape that make an important contribution to the development of the town and its distinct neighbourhoods, in terms of character and appearance, structure, screening or softening, have been identified on the Local Plan Map as Structural Landscaping. Developments are required to respect and plan for the conservation of the landscape character of the town, proposals that affect this role should demonstrate the visual impact of the proposals and should protect and/or enhance structural landscaping, where appropriate.

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

#### **Reasoned Justification**

- 4.55 *This Policy seeks to ensure that development schemes identify and take account of existing structural landscape assets which are a positive element of the character of the town. The Policy also seeks to ensure that impacts on structural landscaping assets are not dealt with as an afterthought, but progressed as an integral part of the design of the scheme, including opportunities for improvements. Consideration should also be given to the key role of structural landscaping and strategic views in order to maintain or improve the character of Crawley. However, as an urban area, new tree planting may not always be the best use of land, and other forms of soft landscaping and habitats could be a beneficial alternative in some cases.*
- 4.56 *To maximise multiple benefits of Structural Landscaping, in line with and complementary to the character of the area, these can also be designed and managed as species-rich habitats. Wild flower meadows and flower-rich habitats, in particular, are crucial to supporting pollinators by providing good sources of nectar and pollen throughout the summer and also shelter and nest sites. The council is committed to securing such enhancements wherever possible.*





## Important Views

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

### Policy CL7: Important and Valued Views

The following types of Important Views identified on the Local Plan Map should be protected and/or enhanced and development proposals should not result in a direct adverse impact or lead to the erosion of these views:

- Linear Contained Views

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

The Boulevard view lies between its junction with the High Street and the Crawley College Tower. Any proposals in the area will be required to retain, or enhance, the vista or to replace it with public realm of equal, or greater, townscape value.

- Long Distance Views

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

### Valued Views

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

- i. Policies HA1-HA7 or other character or design policies relevant to the local area;
- ii. any national or local heritage-, design- or character-related designation in place for the area.

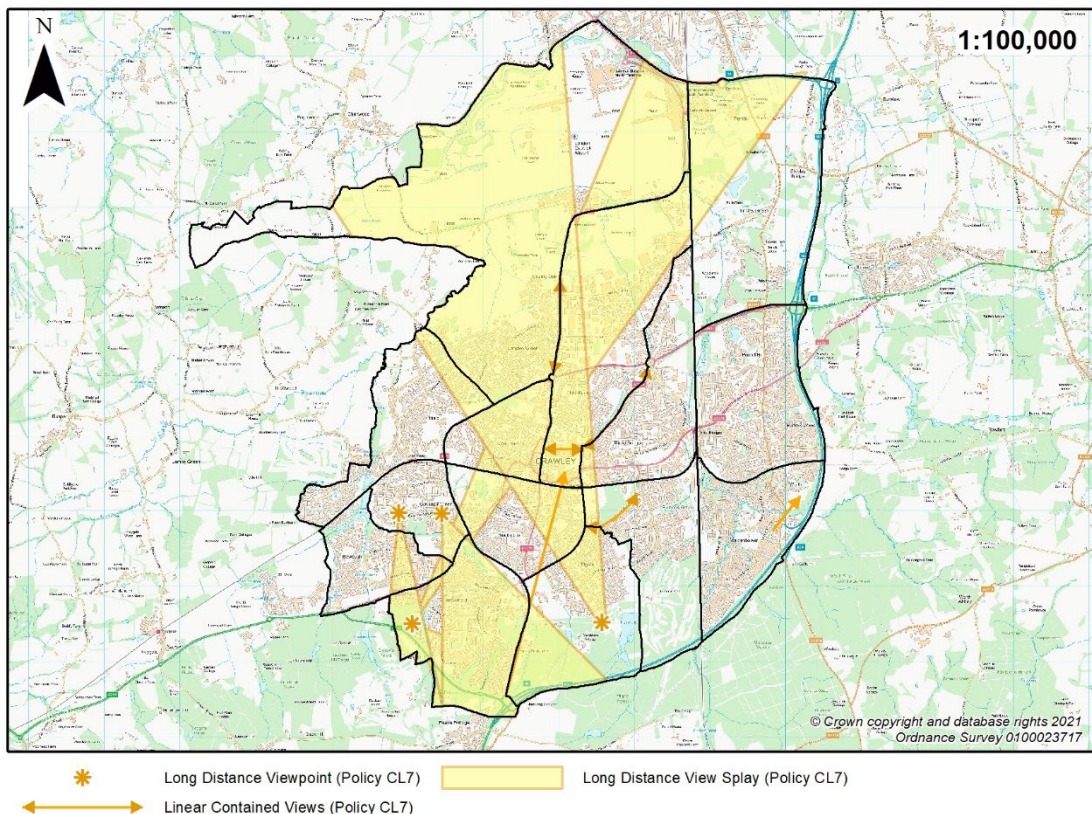
Area Character Assessments, when prepared, will further identify valued localised views. Where such work defines urban and landscape structure, the relationship between landscape, settlement and movement patterns, will be framed and founded upon both long distance and linear views. Views out of a site or place are as important as defining from where there are the most important views into a site.

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

### **Reasoned Justification**

4.58 *The council has identified a number of important views which can be enjoyed from a publicly accessible viewpoint. These enable the viewer to appreciate an attractive or interesting view of areas of the borough that may include landscape features or built landmarks.*

4.59 *The location of viewpoints and the general direction of the view are identified on the Local Plan Map.*





### Linear Contained Views

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

### Long Distance Views

- **Buckwood Drive:** Panoramic views, from vicinity of the northern junction with Kingscote Hill, to the south-east across trees associated with Broadfield Brook and adjacent open space to wooded areas east of Brighton Road and within Tilgate Park.
  - **Gossops Drive:** Long distance view southwards from Gossops Drive, between Cobnor Close and Eden Road, to the part of Target Hill that lies within the borough boundary.
  - **Target Hill:** Views from south-eastern side of the hill, from the vicinity of the junction of Hobbs Road and Edrich Road, to the north-east over the Broadfield Mosque, across the borough to distant hills, and to the south east over the wooded areas associated with Creasy's Brook, the Eddington Hill area and the portion of Pease Pottage Forest and the AONB that lie within the district.
  - **Tilgate Park:** Long distance views, northwards from the country park car park and the adjacent area of open space to the north, across Tilgate, Southgate and the town centre and beyond to Leith Hill, Box Hill and Colley Hill.
- 4.60 The designation would not duplicate protection afforded to Listed Buildings or Conservation Areas. Important but more localised valued views and landmarks, i.e. less than approximately 200m, will be identified, protected and enhanced through Conservation Area, Area of Special Local Character or Locally Listed Building assessments. A number of the important landmarks in the borough are Listed Buildings and some are located within Conservation Areas, including St. Margaret's Church, Ifield; St. Nicholas Church, Pound Hill; and the Church of St. John the Baptist near High Street, Northgate. These buildings are subject to national regulatory and policy controls which include requirements to protect their settings.
- 4.61 The views identified within Manor Royal will be protected and/or enhanced via development undertaken in accordance with guidance contained in the Manor Royal Design Guide SPD and through any works undertaken in accordance with the Manor Royal Public Realm Strategy.

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

- 4.62 It is important that a vibrant multifunctional landscape around Crawley is encouraged, maximising its contribution to people's quality of life, wellbeing, the natural environment and the economy. The Crawley Borough Council Landscape Character Assessment has been used to set the criteria based policies which encourage proposals that respect the character and role of different areas. Policy EC12 of the Local Plan supports appropriate small-scale economic development beyond the Built-Up Area Boundary, where this would not undermine the intrinsic character and

beauty of the countryside. There may also be limited opportunities for appropriate new residential development.

### **Policy CL8: Development Outside the Built-Up Area**

To ensure that Crawley's compact nature and attractive setting is maintained, development should:

- i. Be grouped where possible with existing buildings to minimise impact on visual amenity;
- ii. Identify existing character and key assets, heritage, landscape and built forms, and recognise the significant qualities of the area, including its grain, aspect, scale, natural resources, views, sense of space and tranquillity to guide any new development;
- iii. Identify the strategic context of such settings and environments of the town, and respond intelligently to the underlying landscape and environmental systems and form;
- iv. Maintain a loose-knit, low density rural character clearly differentiating it from development within the urban area;
- v. Be located to avoid the loss of important on-site views and off-site views towards important landscape and heritage features, understanding how they function and how they are experienced and perceived;
- vi. Reflect local character, heritage and distinctiveness in terms of form, height, scale, plot shape and size, elevations, roofline and pitch, overall colour, texture and boundary treatment (walls, hedges, fences and gates). Where screening and existing character allows, careful, unique modern new design could be considered;
- vii. Minimise the impact of lighting to avoid blurring the distinction between urban and rural areas and in areas which are intrinsically dark to avoid light pollution to the night sky;
- viii. Ensure buildings and any external hard surfacing, parking areas, access roads and outdoor storage are not visually prominent in the landscape;
- ix. Avoid generating an unacceptable level and/or frequency of noise in areas relatively undisturbed by noise and valued for their recreational or amenity value;
- x. Avoid generating traffic of a type or amount inappropriate to the rural roads;
- xi. Ensure access to the countryside is maintained and enhanced from Crawley's neighbourhoods, in accordance with Policy OS3 and demonstrate how such areas can be better experienced; and
- xii. Avoid introducing a use which by virtue of its operation is not compatible with the countryside.

In addition to the above, all proposals must recognise the individual character and distinctiveness, and the role of the landscape character area or edge in which it is proposed as shown on the Local Plan Map, established by the Crawley Borough Council Landscape Character Assessment, and set out below.

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

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

#### North East Crawley High Woodland Fringes

Proposals which do not create, or are able to adequately mitigate, visual/noise intrusion are generally supported. This area has an important role in maintaining the separation of the distinct identities of Gatwick Airport, Crawley and Horley.

#### Upper Mole Farmlands Rural Fringe

Proposals which do not create, or are able to adequately mitigate, visual/noise intrusion are generally supported. This area has an important role in maintaining the separation of the distinct identity of Gatwick Airport from Crawley and the valuable recreational links from the northern neighbourhoods of Crawley into the countryside.

#### West of Ifield Rural Fringe

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

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

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

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

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

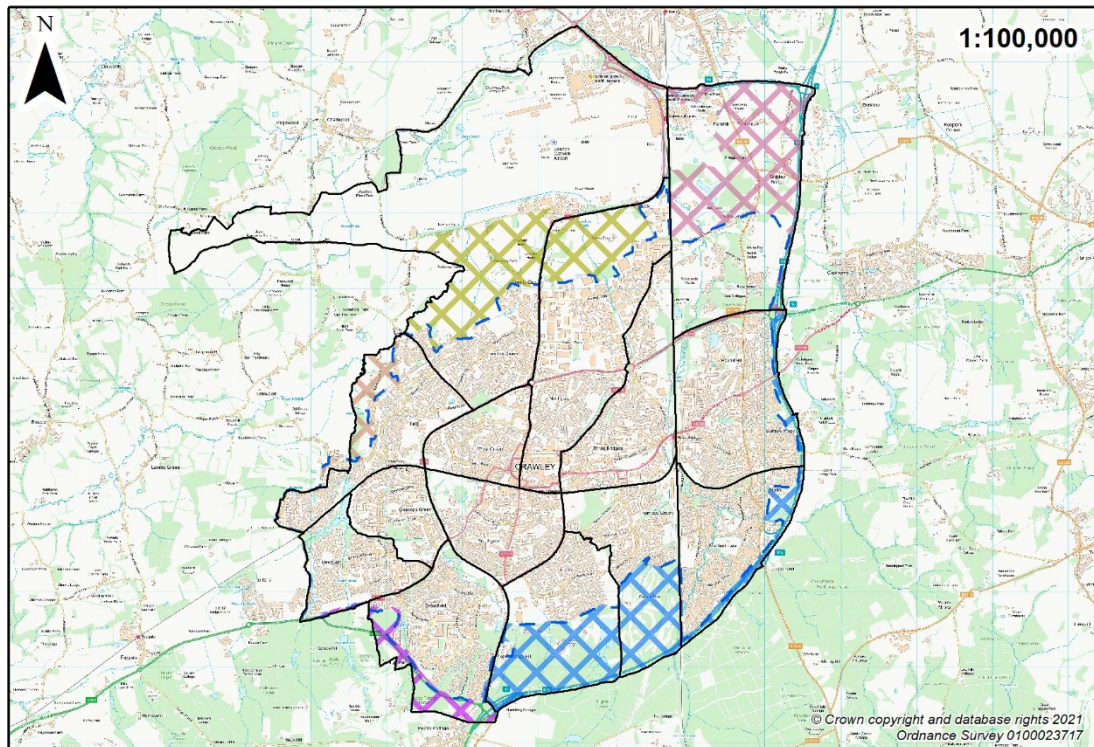
#### Tilgate/Worth Forest and Fringes

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

Where development is proposed close to, or within, the High Weald Area of Outstanding Natural Beauty, it should be planned and designed in accordance with Policy CL9.

### **Reasoned Justification**

- 4.63 *Beyond the Built-Up Area Boundary lays the urban/rural fringe which forms an important landscape setting for the town. The nature, extent and spatial significance offered by differing rural settings and features offer differing advantages to the overall form, landscape and urban structure of Crawley. Certain features will be understood in the context of the borough as a whole whilst others contribute to very local environments. Rural fringe areas require a policy approach which respects their unique character and role whilst also encouraging sustainable development which can enhance access and interaction with the area from Crawley's neighbourhoods. To achieve this, a well-designed approach to the urban/rural fringe is required, which relates development at the periphery to its rural setting, maintaining the character of Crawley as a compact town with good access to the countryside.*



-  Built-Up Area Boundary (Policy CL8 & EC13)
-  Bewbush Rural Fringe (Policy CL8)
-  North East Crawley Rural Fringe (Policy CL8)
-  South of Broadfield Rural Fringe (Policy CL8)
-  Tilgate/Worth Forest Rural Fringe (Policy CL8)
-  Upper Mole Farmlands Rural Fringe (Policy CL8)
-  West of Ifield Rural Fringe (Policy CL8)
-  Rural Fringe (Policy CL8)

4.64 *It is important to ensure the rural fringe does not become incrementally more suburban in nature which would conflict with the overarching principles on meeting the presumption in favour of sustainable development (Policy SD1: Presumption in Favour of Sustainable Development) and will be resisted. Urban extensions will be in the countryside outside Crawley’s boundary and need to be properly planned to ensure the important contribution of the rural landscape setting for Crawley’s neighbourhoods is not lost. The visual, spatial and environmental aspects of their landscape setting must be fully assessed and any development planned to protect and enhance important aspects.*

**High Weald Area of Outstanding Natural Beauty**

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

**Policy CL9: High Weald Area of Outstanding Natural Beauty**

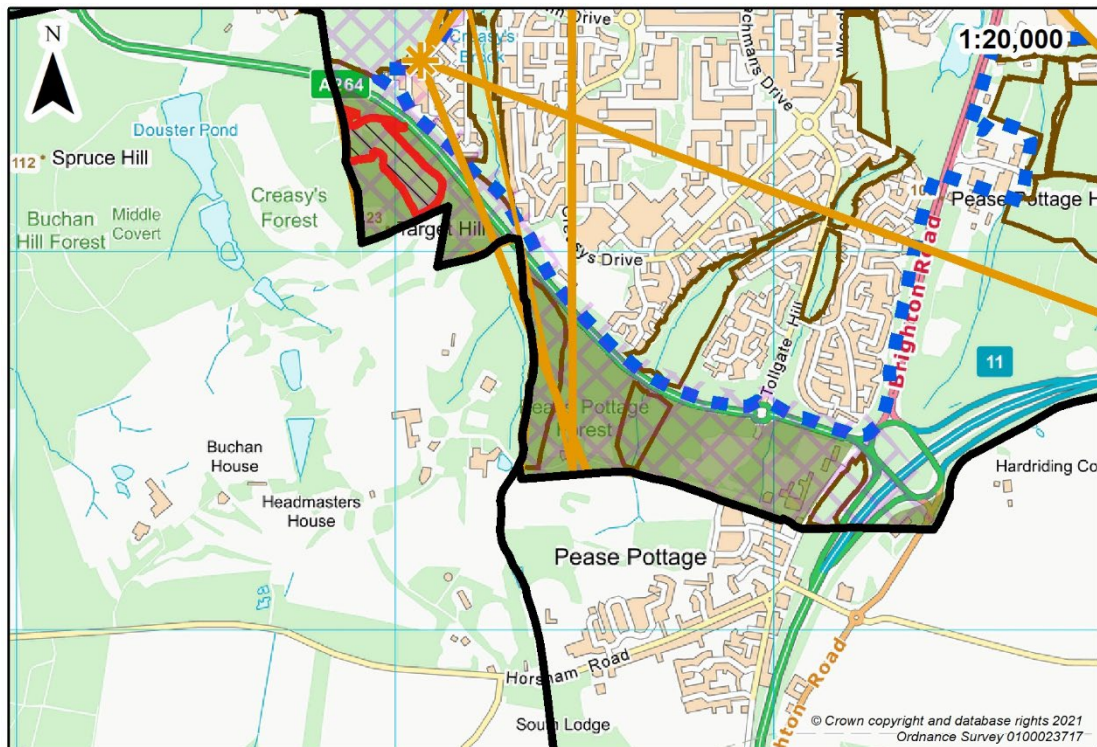
The council will conserve and enhance the natural beauty and setting of the High Weald AONB by having particular regard to the High Weald AONB Management Plan in determining development proposals affecting the AONB.

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



### Reasoned Justification

4.66 The small area of the AONB within Crawley's boundary is located to the south of the A264 which separates it from Broadfield Neighbourhood. The western part (the former Broadfield Kennels) is allocated under Local Plan Policy H8 as a reserve Gypsy and Traveller site for up to 10 pitches. The eastern part is heavily wooded and incorporates the Little Trees Cemetery. To the east is a row of houses along Old Brighton Road, considered part of Pease Pottage Village. Buchan County Park is within the High Weald AONB and adjacent to Crawley's boundary.



4.67 The borough council has a statutory duty to conserve and enhance the natural beauty of the High Weald AONB. 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. In addition, 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.

4.68 Proposals within the AONB will be judged against the guidelines and advice of the High Weald AONB Management Plan. The Management Plan provides a transparent and accessible means by which the council can ensure that it is exercising its duty to have regard to the purposes of designation<sup>49</sup> and providing a guide for everyone involved with the actions they can take to care for the area.

4.69 The Management Plan, updated in 2019, establishes five defining components of character that have made the High Weald a recognisably distinct and homogenous area for at least the last 700 years: 1. Geology, landform and water systems; 2. Dispersed historic settlements; 3. Dense network of historic routeways; 4. Abundance of ancient woodland; 5. Small, irregular fields, bounded by hedgerows and woods, with distinctive zones of lowland heaths and inned river valleys.

<sup>49</sup> Section 85, Countryside and Rights of Way Act 2000

## Design & Development Requirements

- 5.1 Design continues to be an important consideration. The NPPF is clear that *“the creation of high quality buildings and places is fundamental to what the planning and development process should achieve”*<sup>50</sup>.

### Chapter Content

- 5.2 This chapter sets out policies to guide detailed development matters. It covers the design and the landscaping criteria expected for all new development and specific requirements relating to particular developments.

### The Key Issues

#### Design

- 5.3 Good design is key, helping make development acceptable to communities, and should be grounded in an understanding and evaluation of each area’s defining characteristics. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. It is important therefore to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces in new development as part of larger areas. *“Well-designed buildings are carefully integrated with their surrounding external space. All private and shared external spaces including parking (see Movement), are high quality, convenient and function well. Amenity spaces have a reasonable degree of privacy. External spaces are designed to respond to local character, as appropriate solutions will vary by the context, for example whether it is a town centre or suburb”*<sup>51</sup>.

#### New Housing Development

- 5.4 The design and layout of housing has for centuries been well understood, appreciated and applied across Britain. Conversely, apartment and maisonette living lacks the same understanding or application. Apart from the positive perceptions associated with Penthouse and Loft apartments, the preference of most UK urban dwellers would be to live in a house. People generally believe that apartment living offers less conveniences and flexibility. Design and residential amenity standards need to improve as new development now has to be more compact and sustainable in order to make efficient use of land. How flats are designed, improved standards in relation to internal planning and layout, as well as the management of the common areas, are all key to changing both perceptions and the quality of apartments and maisonettes. *“Apart from the question of privacy, the critical issues connected with living in flats can be listed under three main headings:*
- *quality of internal planning and layout;*
  - *sharing circulation spaces (that is entrances, lifts, stairs and corridors), common facilities such as refuse disposal and parking, services such as aerial systems and deliveries, and most importantly, maintenance;*
  - *aspect and orientation”*<sup>52</sup>.
- “Well-designed homes and communal areas within buildings provide a good standard and quality of internal space. This includes room sizes, floor-to-ceiling*

<sup>50</sup> National Planning Policy Framework, paragraph 124 (2019) MHCLG

<sup>51</sup> National Design Guide, page 39 ‘homes and buildings’ (1 October 2019) MHCLG

<sup>52</sup> The Housing Design Handbook (2010) David Levitt, Levitt Bernstein Architects

*heights, internal and external storage, sunlight, daylight and ventilation. The quality of internal space needs careful consideration in higher-density developments, particularly for family accommodation, where access, privacy, daylight and external amenity space are also important... Well-designed places include a clear attention to detail. This considers how buildings operate in practice and how people access and use them on a day-to-day basis, both now and in future”<sup>53</sup>.*

- 5.5 Policies DD1-DD3 outline the requirements of all new development, particularly relating to new dwellings, including flats and maisonettes. Other policies in the chapter relate to specific development issues which can affect the amenity and character of the borough, such as trees and advertisements.

## Local Plan Policies

### The Normal Requirements of All New Development

- 5.6 An attractive and well-planned environment can contribute to wellbeing and attract inward investment to the borough. Therefore, new developments should be of a high quality to protect and enhance the distinctive character of the town and create successful new streets and spaces. In determining whether a development proposal is of a high standard of design, there should be careful consideration of how the scheme would look, how it would work in practice and whether it is built to last, for example in terms of the choice of materials.
- 5.7 Once urban form and landscape characterisation assessment studies have been completed, the resulting understanding and evidence must guide a bespoke local design approach tailored specifically to the character of its immediate context.

### Strategic Policy DD1: Normal Requirements of All New Development

Development proposals must use land efficiently and not unduly restrict the development potential of adjoining land, nor prejudice the proper planning and phasing of development over a wider area.

All proposals for development in Crawley will be required to:

- a) Provide or retain a good standard of amenity for all existing and future occupants of land and buildings, and not cause unreasonable harm to the amenity of the surrounding area by way of overlooking, dominance or overshadowing, traffic generation and general activity, for example noise, smells and/or vibration;
- b) Design the orientation and aspect, including the location of habitable rooms in order to optimise solar gain, recognising the influence of the daily sun path and green infrastructure.
- c) Retain and reuse existing buildings occupying a site or demonstrate why this is not feasible, viable or desirable. This is particularly relevant in the case of building, structures or landscape features that contribute to local character, setting and context;
- d) Include well-located public spaces that support a wide variety of activities and encourage human interaction to promote health, wellbeing, social and civic inclusion. Streets within residential neighbourhoods should, in particular, be designed to prioritise pedestrians with a focus on social interaction, such as play, communal gatherings and places to sit with neighbours.
- e) Include development form and architectural quality and specification which complements the existing setting and character of the area, especially where buildings are being replaced;

<sup>53</sup> National Design Guide, pages 39-40 'Homes and buildings' (1 October 2019) MHCLG

- f) For large applications, consider flexible development forms that can respond to changing social, technological and economic conditions and provide diversity and choice through a mix of compatible uses that work together to create viable places that respond to local needs;
- g) Retain existing individual or groups of trees and green infrastructure and biodiversity assets that contribute positively to the area, and enhance soft landscaping, designing it in as an integral part of the layout. Trees should have sufficient space to reach maturity and sufficient space should also be provided to ensure private gardens would not be overshadowed by tree canopies and rooms within buildings would receive adequate daylight. All development should meet the standards set out in Policy DD4 where trees would be lost to development and all development should meet the Biodiversity Net Gain requirements set out in Policy GI3;
- h) Demonstrate how “Secure by Design” principles and guidance set out in “Secured by Design” design guide (as amended) have been incorporated into development proposals to reduce crime, the fear of crime, anti-social behaviour and disorder. Also, for all development, the potential impact on community safety must be carefully considered at the earliest opportunity to ensure that measures are integrated into proposals without compromising other objectives;
- i) Meet the requirements necessary for their safe and proper use, in particular with regard to access, circulation and manoeuvring, vehicle and cycle parking, loading and unloading, and the storage and collection of waste/recycling; and
- j) In respect of residential schemes, demonstrate how the Building for Life 12 criteria (as amended) for the evaluation of the design quality of residential proposals have been taken into account and would be delivered through the scheme.

Major applications and any residential scheme with a density in excess of 45 dwellings per hectare must be supported by an indicative future management and maintenance plan for all shared and all semi-public or semi-private areas of hard and soft landscaping, to ensure these areas become well-established.

For all proposals, street scene improvements, public art, CCTV, and access and safety measures (such as fire hydrants), or contributions towards these, will be sought on a site specific basis in accordance with policy and relevant service requirements.

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

### **Reasoned Justification**

- 5.8 *Further guidance on how development proposals can address all these matters can be found in relevant supplementary planning guidance produced by the council including the Residential Extensions SPD, Conservation Area Appraisals, the Manor Royal SPD, and advice on signs and advertisements. Further information on specific requirements for development applications can be found in the Local List of Planning Requirements.*
- 5.9 *A comprehensive approach can be more efficient and reduce the impact of development, ensuring that land that has a reasonable prospect of being developed is not prejudiced or restricted.*
- 5.10 *The council places particular importance on the need for all developments, whether on sites with designated features or not, to be of high quality and to protect and*



*enhance the distinctive character and important cultural heritage of the town. Existing assets and their settings should be preserved and where possible enhanced.*

- 5.11 *Many of the decisions that influence design quality are taken at early feasibility stage. 'Building for Life 12' (third edition, 2015) has been developed by CABE at the Design Council, Design for Homes and the Home Builders Federation as a tool to evaluate housing proposals. Building for Life uses 12 criteria, grouped into three categories – 'Integrating into the neighbourhood', 'Creating a place' and 'Street and home', to assist in the design process by highlighting where good practice can be applied. To raise standards, the council will also encourage the use of design reviews, where appropriate. The council will continue to prepare supplementary planning documents and encourage pre-application discussions.*
- 5.12 *Community safety is an important issue in the borough and in determining whether a place is an attractive location in which to live, work or to visit. The fear or perception of crime and anti-social behaviour is also socially damaging and detrimental to the local economy. The design, location, use or change of use and operation of a wide range of proposals can make a significant contribution to community safety. Strategic Policy CL2 3c outlines the urban design principles all major applications need to apply in order to build in passive safety to development layout. In considering the design of individual buildings, the application of Secured by Design principles have been proven to achieve a significant reduction of crime risk by combining minimum standards of physical security and well-tested principles of natural surveillance and defensible space.*
- 5.13 *The Policy also seeks to ensure that development schemes identify and take account of existing landscape assets that are a positive element for the character of the town, and that landscape proposals are not dealt with as an afterthought but are progressed as an integral part of the design of the scheme. All new proposals should be mindful of the long-term future management and maintenance requirements for the development scheme and address responsibilities for this as part of any planning application. To ensure high quality public realm across the borough, irrespective of the intended management responsibility, all sites should meet standards set by the Local Authority for the purposes of their adoption as part of its amenity maintenance role. Local Authority standards will be provided to support development schemes and the preparation of management and maintenance plans.*
- 5.14 *This Policy will also ensure that retained trees that make a contribution to the streetscene are not at risk of being removed because they significantly reduce the usability of new gardens for residents or because new buildings are placed in close proximity. Tree losses through development that are accepted by the local planning authority should be mitigated by new planting.*
- 5.15 *Public art can highlight what is special or locally distinctive about an area and create cultural assets that help in the creation of interesting streets and spaces. These can add to the enjoyment of an area or help people to navigate the locality. Attractive streets and spaces can encourage other forms of investment and patronage by customers. More information regarding providing public art as part of development schemes and through contributions is set out in the Urban Design SPD and the associated Public Art Annex to the SPD, and in the Planning Obligations Annex attached to this Local Plan.*
- 5.16 *New development will be used in the Town Centre and neighbourhood centres to achieve environmental and regeneration objectives. All development, including new or altered shop fronts and advertisements, should be of a high quality design standard and reinforce the impact of improvement initiatives.  
"Well-designed public spaces, particularly streets, are designed to support an active life for everyone, and are maintained for continual use. It is important to design them*

*to include all of the users who may wish to use them for activities such as socialising, informal doorstep play, resting and movement. Their success depends on them being fit for purpose, attractive places that people enjoy using”<sup>54</sup>.*

- 5.17 *Crawley Borough Council’s Local List of Planning Requirements is available from the council’s Development Management team, and on the council’s website: [www.crawley.gov.uk](http://www.crawley.gov.uk). It sets out the local validation requirements for planning applications and gives specific guidance for each application type.*

### **Inclusive Design**

- 5.18 It is essential to consider inclusive design as early as possible in a scheme’s development, and inclusive design should be embedded into a project from initial conception through to completion, occupation and in the on-going management and maintenance of the development.

#### **Policy DD2: Inclusive Design**

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

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

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

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

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

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 include where proposals involve protected structures or landscape or where site conditions are difficult, such as on sloping land. Other inclusive features (downstairs toilet, 1500mm turning circle and raised power points) are strongly recommended to be incorporated, where practicable.

### **Reasoned Justification**

- 5.19 *Crawley is projected to see a notable increase in the older person population, with the total number of people age 65 and over projected to increase by 55% over the*

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<sup>54</sup> National Design Guide, page 31 ‘Public Spaces’ (1 October 2019) MHCLG



twenty years 2019 to 2039. In addition, approximately 30% of households contain at least one person with a long-term health problem or disability. It is likely that the age profile will impact upon the numbers of people with a long-term health problem or disability, and those people in the oldest age bands are more likely to experience these. Crawley's older population exceeds the West Sussex levels and is close to the national average. The Strategic Housing Market Assessment<sup>55</sup> (SHMA) indicates that the population with a long-term health problem or disability can be expected to grow by 7,000 persons by 2039; and the numbers of persons with mobility problems or dementia can be expected to grow significantly.

- 5.20 *Many older people will continue to live in their existing homes. As it is not possible to know when a long-term health problem or disability may affect any individual, and the existing stock will continue to form the majority of housing available within the borough in the future, it is maintained that, unless there are exceptional, practical, circumstances which make meeting inclusive design criteria and, in the case of residential developments, the 'accessible and adaptable' Building Regulations levels impossible, these should be clearly illustrated on submissions as part of a planning application. The SHMA suggests a need for around 600 wheelchair user homes in Crawley in the period to 2039, which equates to about 5% of the total housing need, and provision of appropriately designed units is encouraged as part of housing schemes.*
- 5.21 *All people should be able to visit any dwelling or building with dignity. With this in mind, all new development should have at least one accessible main living space or, in non-residential situations, one visit-able room and include an accessible toilet; and be able to be entered and exited safely and easily.*
- 5.22 *Incorporating accessible entrances and other accessibility features as part of household extensions seeks to acknowledge 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.*
- 5.23 *Viability constraints will not be considered reasonable justification for not seeking to apply this policy, unless it can be demonstrated that consideration to meet the requirements had been taken into account from the early design and layout stages of development, and were shown to not be practicable or physically possible to achieve.*

### **Standards for New Housing Development**

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

### **Policy DD3: Standards for All New Dwellings (including conversions)**

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

<sup>55</sup> Northern West Sussex Strategic Housing Market Assessment (2019) Icen Projects

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

Number of Bedrooms	Occupancy	1 Storey	2 Storey	3 Storey	Built-in Storage
1 bedroom/Studio (a)	1 person	37			1.0
1 bedroom/Studio (b)	1 person	39			1.0
1 bedroom	2 person	50	58		1.5
2 bedroom	3 person	61	70		2.0
2 bedroom	4 person	70	79		2.0
3 bedroom	4 person	74	84	90	2.5
3 bedroom	5 person	86	93	99	2.5
4 bedroom	5 person	90	97	103	3.0
3 bedroom	6 person	95	102	108	2.5
4 bedroom	6 person	99	106	112	3.0
5 bedroom	6 person	103	110	116	3.5
4 bedroom	7 person	108	115	121	3.0
5 bedroom	7 person	112	119	125	3.5
6 bedroom	7 person	116	123	129	4.0
4 bedroom	8 person	117	124	130	3.0
5 bedroom	8 person	121	128	134	3.5
6 bedroom	8 person	125	132	138	4.0

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

**Notes:**

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

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

Residential developments should be designed to include amenity space standards adequate to meet basic privacy, amenity and usability requirements; suitable for the likely level of occupancy. Specific consideration of the needs of families should be given to larger dwellings as well as 2 bedroom, 3 person apartments, or larger.

In addition to the Nationally Described Space Standards, medium and higher density new residential development is encouraged to achieve the following:

- i. Attractive communal circulation spaces which avoid long, narrow, badly-lit and ventilated internal corridors. The use of external gallery access and the use of central atria to improve natural ventilation and dual aspect, is also welcomed.
- ii. Integrated tenures with entrance lobby and cores being shared between owner-occupiers and shared ownership occupiers.
- iii. All units either dual aspect or where single aspect, south facing.
- iv. Units with minimum clear floor to ceiling height of 2.7m for 3 person 2 bedroom units and above or, if proven, a lower height where it suits the proportions of a narrower unit.
- vi. Usable private outdoor space, at least 2.5m in depth x 4m wide, and accessed directly from main living areas or kitchen.

**Reasoned Justification**

5.26 *Individuals need sufficient private space to undertake the normal functions of living together including recreational activities. The internal space standards are based on*

*the designed level of occupancy as the number of occupants will fluctuate over the life of the dwelling. The starting point for the space standards is the need for rooms to be able to accommodate a basic set of furniture, fittings, activity and circulation space appropriate to the function of each room. The intention is to prevent the development of and cumulative effects of unsuitable homes. Designers will be able to respond to market demands in terms of how the space is used or whether higher standards are required for commercial reasons, for example to accommodate en-suite bathrooms.*

- 5.27 *The minimum size for each dwelling is net space including the area enclosed by unfinished faces of walls of dwellings including space taken by stairs, general storage space, partitions, chimney breasts, flues etc. but excluding garages, dustbin, fuel and bicycle stores, balconies, porches and lobbies open to the air, areas within any room with ceilings less than 1.5 metres high and any area intended to function as an access way.*
- 5.28 *Minimum ceiling heights are important to ensure sufficient space and light in new dwellings, as incorporated in the space standards. However, there may be exceptional sites where this may not be appropriate in design terms, for example in Conservation Areas characterised by smaller building heights or adjacent to a Listed Building.*
- 5.29 *Sufficient external space, ideally directly accessible from the main living space or kitchen, is also required for residents, to protect the amenities of neighbours and to enable private gardens to contribute positively to the character and appearance of the area. Further guidance is provided by the Urban Design Supplementary Planning Document.*
- 5.30 *In apartment schemes, limiting the number of dwellings accessed per floor at two or three improves passive management of the common areas. However, the costs of lift provision are recognised for smaller schemes, therefore, this is only encouraged for new development of medium density and above (see Policy CL4). Flats grouped around a core is usually the ideal arrangement. This allows for the shortest distance from front doors to lift and stairs, and avoids the need for long, narrow, badly lit and ventilated internal corridors. External gallery access is also welcomed as it has the added benefit of facilitating cross ventilation and alternative floors with dual aspect when designed in conjunction with two storey maisonettes. Dual aspect windows within apartments maximise the provision of natural light, and any single aspect units should ideally be south-facing. Dual aspect can also be achieved by adding projecting 'bay' extensions to the main living spaces, positioned proud of the principal elevation, these 'bay' elements offer potential for glazing in two directions.*
- 5.31 *Developers are also encouraged to consider the needs of families in the layout of flats which differ from those of non-family households. For new residential development in excess of 80 units, an average 2 bedroom, 4 person, single storey family home should include:*
- i. A Gross internal floor area of a minimum of 80sqm;*
  - ii. Useable private outdoor space, large enough for the whole household to use for meals and that gets direct sunlight at some time of the day;*
  - iii. Adequate additional space for recycling within the kitchen space, as per the requirements set down in 'building for life' criteria;*
  - iv. A utility room with space for washing and drying appliances and an external vent;*
  - v. A minimum of 4.0sqm in built storage space within the dwelling;*
  - vi. Secure private storage at ground floor level;*
  - vii. Flexible internal planning, to allow children to have a room of their own as they become teenagers;*

- viii. *One extra living space or home office, to provide families with separate living space options. This is particularly important where units have open-plan living, kitchen, dining arrangements.*

### **Tree Replacement Standards**

5.32 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 and biodiversity amenity. This needs to be accounted for at an early stage. Where trees are agreed for removal as part of a development scheme, replacement trees will be required. This policy does not apply to Ancient Woodland or Aged Trees which must be considered against Policy GI3 and national policy and guidance. Additional new tree and landscape planting requirements for development schemes, beyond any replacement provision, should seek to assist in achieving Biodiversity Net Gain as required by Policy GI3.

#### **Strategic Policy DD4: Tree Replacement Standards**

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

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

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

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

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

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

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

### **Reasoned Justification**

- 5.33 *Trees are considered to be a material consideration where planning permission is required. Trees existing on or adjacent to a development site (within falling distance) can present significant constraints upon development, often requiring expert advice to find an appropriate solution. Without appropriate consideration at an early stage of design, existing trees and hedges can be easily damaged and lost through development. Damage can occur to trees through thoughtless construction practices, such as vehicle collisions and root severance, as well as through more indirect factors, such as changes in the surrounding ground levels, compaction of the soil structure and contamination.*
- 5.34 *A significant loss is incurred even when a new tree is planted to replace an older one that has been felled. Depending on the species, it takes between 15 and 40 years for a tree to grow a sufficiently large canopy to deliver meaningful aesthetic, air pollution removal, rainwater management and other benefits. In terms of biodiversity, the older the tree the richer the wildlife that it supports. To ensure that adequate compensation is delivered the diameter measurement is used as a basis for the number of replacement trees that would achieve a similar canopy cover. The policy, in conjunction with the requirements of Policy GI3 on Biodiversity and Net Gain, ensures that the green character and appearance of the borough is maintained.*
- 5.35 *The cost of off-site planting by the council, in lieu of provision on-site, will be based on the cost of a sixteen to eighteen centimetre girth tree measured at 1.5m off the ground, planting, sundries and watering over a five year period to ensure that the tree becomes established. Where tree planting will occur within a hard paved area, the additional cost of construction for a tree pit must be funded. This is set out in the Planning Obligations Annex.*
- 5.36 *When planting a tree, the existing sewerage and water supply infrastructure should be taken into account, as well as the choice of appropriate tree species for the ground conditions and environment. The Green Infrastructure SPD (Appendix 6) lists appropriate species that could be planted in Crawley. Where possible, UK sourced and grown tree stock should be used to support biodiversity and resilience. Site-specifics such as ground conditions, light/sunlight and proximity to buildings and paving/footpaths must be taken into account to ensure the correct species is used for the location and purpose and does not result in nuisance or early removal of the tree. In addition, other matters for consideration include climate change resilience, pollination opportunities, carbon storage, air quality management, street use and bird strike concerns of Gatwick Airport's aerodrome safeguarding.*

### **Aerodrome Safeguarding**

- 5.37 Aerodrome safeguarding is the process used to ensure the safe and efficient operation of airports. It is in place to help protect aircraft and passengers during take-off and landing and while flying in the vicinity of the airport. This in turn helps ensure the safety of people living and working nearby.
- 5.38 Aerodrome safeguarding differs to the principle of safeguarding land for a possible additional runway to the south of Gatwick Airport. Instead, it relates to how a development could impact on safety. Aerodrome Safeguarding assesses, for example, the height and design of proposed development or construction equipment that might be used (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 aviation created by large landscaping schemes, lighting designs and new water bodies which could attract birds hazardous to aviation.
- 5.39 Gatwick Airport is an EASA certified aerodrome. Therefore, the council is required to consult Gatwick Airport Limited on all planning applications where aerodrome

safeguarding applies. The safeguarded area is neither the responsibility nor the proposal of the local planning authority.

### **Policy DD5: Aerodrome Safeguarding**

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

Where required, the Local Planning Authority will consult with the airport operator and/or the operator of technical sites (e.g. radar stations) on relevant proposals in the aerodrome safeguarded areas. Statutory consultation responses may require that restrictions are placed on the height or detailed design of buildings, structures or other development to avoid impacts on the airport aerodrome, including those relating to navigational aids or on developments which may increase bird-strike risk, create building-induced turbulence or include lighting that could pose a hazard to the safe operation of the airport aerodrome.

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

#### **Reasoned Justification**

- 5.40 *Aerodrome safeguarding is a legal requirement by way of ICAO (International Civil Aviation Organisation) & EASA (European Aviation Safety Agency) and is embedded in the Town & Country Planning process by way of ODPM/DfT circular 01/2003 'Safeguarding of aerodromes & military explosives storage areas' Direction 2002. Recently published evidence<sup>56</sup> is suggesting that, in general terms, the guidance in Planning Circular 01/2003 is not being applied consistently by local planning authorities, and suggests that for clarity, local plans with an officially safeguarded aerodrome should include a policy.*
- 5.41 *Policy DD5 has been included to raise awareness of the requirements of Aerodrome Safeguarding and ensure the safe operation of Gatwick Airport is taken into account in the design of development. The whole borough of Crawley is covered by the Aerodrome Safeguarding area, and this is shown on the Local Plan Map. Aerodrome Safeguarding also applies outside of Crawley Borough, and developers may need to liaise with Crawley's neighbouring Local Authorities to clarify if development is subject to Aerodrome Safeguarding outside of the Crawley administrative area.*
- 5.42 *Developers should refer to the Local List and also consult with the Gatwick Airport via [gal.safeguarding@gatwickairport.com](mailto:gal.safeguarding@gatwickairport.com) for advice on planning applications in the vicinity of the aerodrome. Developers should also refer for general awareness to the AOA (Airport Operators Association) technical aerodrome safeguarding advice notes available at [www.aoa.org.uk/policy-campaigns/operations-safety/](http://www.aoa.org.uk/policy-campaigns/operations-safety/).*

#### **Advertisements**

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

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<sup>56</sup> Lichfields in liaison with General Aviation Awareness Council (July 2018)



## Policy DD6: Advertisements

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

- a) The impact on visual amenity in the vicinity of the advertisement, taking into account the degree to which it is in scale or keeping with any host building or structure, or with the character of the locality, including scenic, historic, architectural or cultural value or features.
- b) Any impact on visual or aural amenity, including on light sensitive species and sensitive habitats, in the vicinity arising from lighting or noise associated with the advertisement.
- c) The potential impact on road safety through:
  - i. obstruction or impairment of sight-lines;
  - ii. obstructing, confusing, or distracting the view of a road user;
  - iii. leaving insufficient vertical or lateral clearance for vehicles;
  - iv. confusion, glare, dazzle or distraction caused by lighting;
  - v. causing pedestrians to walk or stop in hazardous places;
  - vi. misleading resemblance to road traffic signs.
- d) The potential impact on railway safety through impairment of the ability of railway personnel to recognise and interpret signals, warning boards, lights, signs and level crossings from the railway.
- e) The potential impact on the safety of aircraft through glare, resemblance to visual landing guidance signals, proximity to the flight path of aircraft, or impairment of radar or navigational aid equipment.

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

### **Reasoned Justification**

5.44 *Poorly-designed, and inappropriately located, adverts and signs can negatively impact the visual environment and lead to clutter and visual confusion. They can also impact on light sensitive species, and on road, rail and aircraft safety. Therefore, it is important that adverts and signs are a conscious consideration and are integrated into the overall design of a development.*

### **Crossovers**

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

## Policy DD7: Crossovers

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

### **Reasoned Justification**

5.46 *As a result of its development as a new town in the 1950s and 1960s, a significant number of properties in the town were not built with drives or garages within the curtilage of their property, and there are limited on-street parking opportunities. Therefore, some residents seek to install hardstanding within their garden to provide*

*parking spaces. Whilst the provision within a garden of a hardstanding does not always require a planning application, the crossing of a pavement or verge to access the space, if the property is on a classified road or the land crossed is not highway, does. The creation of a crossover can lead to the loss of on-street parking spaces so it is important that the level of this impact is assessed. Any proposal will also need to be considered with regards to highway safety. Hardstandings and crossovers can also have a detrimental impact on the amenity of the street scene.*

## Heritage Assets

- 6.1 Crawley is best known as a post-war New Town. However, the territory covered by the borough has produced evidence of human activity extending back over thousands of years. The physical remains of this activity above and below ground include assets of international, national and local importance, forming a link to a long, complex and unique history, and a focus for identity, community and learning in the context of the modern town.
- 6.2 Evidence of human activity recorded in Crawley includes local finds of Palaeolithic (Old Stone Age) and Mesolithic (Middle Stone Age) tools. The emergence of more complex forms of social organisation is signalled by finds and sites from the Later Bronze and Iron Ages. Local evidence of the Wealden iron industry extends at least as far back as the Roman period, as found at Broadfield and Goffs Park, and includes later medieval and post-medieval sites at ASDA on Pegler Way, Ifield, Worth and elsewhere. Exposed and tangible archaeological remains include iron ore pits, as at the Hawth, a range of medieval moated sites, and a deserted medieval site at Tinsley Green.
- 6.3 The present-day town is the successor of settlements established in the Anglo-Saxon period. Ifield and Worth are mentioned in the Domesday Book of 1086 and Crawley was the site of a market from 1203. These grew through the pre-industrial period, with Crawley in particular benefiting from its position on the London-Brighton highway. The coming of the railways in the 1840s promoted further development around stations at Three Bridges and Crawley, which became the main focus of pre-New Town growth.
- 6.4 An unprecedented transformation of the area was heralded in 1947 with Crawley's designation as one of eight New Towns selected to provide work and homes away from the overcrowded and bomb-damaged capital. Rapid growth followed from the 1950s onwards, initially under the aegis of Crawley Development Corporation working within the framework of Anthony Minoprio's masterplan, and latterly under the direction of a more regular system of local government.
- 6.5 Much of the historic fabric has been retained as the town has grown, resulting in a borough with a rich and diverse array of heritage assets from Grade I listed structures hundreds of years old to excellent examples of New Town architecture and planning. These elements blend to form Crawley's unique character<sup>57</sup>.

## Chapter Content

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

## The Key Issues

- 6.7 As a New Town, much of Crawley's built environment has been constructed over the last 60 years, and many residents particularly value those heritage assets that predate this period. This is reflected in the areas and buildings that are currently afforded protection as Conservation Areas or Listed Buildings. However, there is

<sup>57</sup> Detailed summaries of the character of the borough are provided in the Crawley Historic Character Assessment Report (2008), undertaken as part of the joint English Heritage (now Historic England), West and East Sussex County Councils' Extensive Urban Survey project (EUS, 2004-9); and in the Crawley Baseline Character Assessment (Edaw|Aecom, 2009).

increasing recognition of the value of some of the “New Town” buildings that have been built since 1947. Many of these assets are locally distinctive and, therefore, it is of importance to have a clear approach for enhancing and protecting them.

## Local Plan Policies

### Crawley’s Heritage Assets

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

### Strategic Policy HA1: Heritage Assets

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

- Listed Buildings (see also Policy HA4);
- Scheduled Monuments (see also Policy HA7);
- Non-designated archaeological assets of equivalent significance to scheduled monuments (see also Policy HA7);
- Conservation Areas (see also Policy HA2);
- Locally Listed Buildings (see also Policy HA5)
- Areas of Special Local Character (see also Policy HA3);
- Historic Parks and Gardens (see also Policy HA6);
- Other non-designated assets with archaeological interest (see also Policy HA7).

All development should respond to these as a finite resource, providing a distinctive combination of social, economic and environmental benefits. Proposals should seek to ensure that heritage assets’ key features or significance are conserved and enhanced as a result of development.

Where a designated heritage asset is affected by a proposal, great weight will be given to its conservation, while harm to, or loss of, its significance will require justification according to the importance of the asset and the degree of loss or harm, in line with local and national policy.

Proposals affecting the significance of a non-designated heritage asset will be considered according to the scale of any harm or loss, and the asset’s significance, in line with local and national policy.

Where a development affects a heritage asset or the setting of a heritage asset, a Heritage Impact Assessment will be required. This should:

- i. for development proposals meeting criteria set out in the council’s Local List of Planning Requirements: include, and be informed by, the findings of a search of the Historic Environment Record (HER) and/or an Archaeological Desk-based Assessment;
- ii. in all cases: describe, with reference to relevant sources (such as the National Heritage List for England and Conservation Area Appraisals), the significance of any heritage assets affected and the contribution made by their setting, the impact of the development, and any measures adopted to ensure the heritage asset is respected, preserved or enhanced or, for exceptionally significant development, relocated.

The loss or replacement of a heritage asset may be appropriate in exceptional circumstances, where justified in line with local and national policy on loss or harm, and where it has been demonstrated that:

- the site is essential to the development's success;
- the benefits of the entire scheme outweigh the loss of the asset; and
- any replacement scheme makes an equal contribution to local character and distinctiveness.

In cases where a heritage asset is considered to be suitable for loss or replacement in accordance with local and national policy, and it has been demonstrated that its site is essential to the development's success, proposals will be subject to a requirement to record the asset(s) concerned. The scheme of investigation, including the Historic England Recording Level, is to be agreed with the council in advance of its implementation and will reflect the importance and nature of the asset and the impact of the proposal.

Applicants in such cases will also be required to notify any relevant parties including Historic England and submit their recording to the Historic Environment Record.

Regeneration proposals that make sensitive use of heritage assets, particularly where these bring redundant or under used buildings or areas, especially any on Historic England's At Risk Register, into appropriate use will be encouraged.

### **Reasoned Justification**

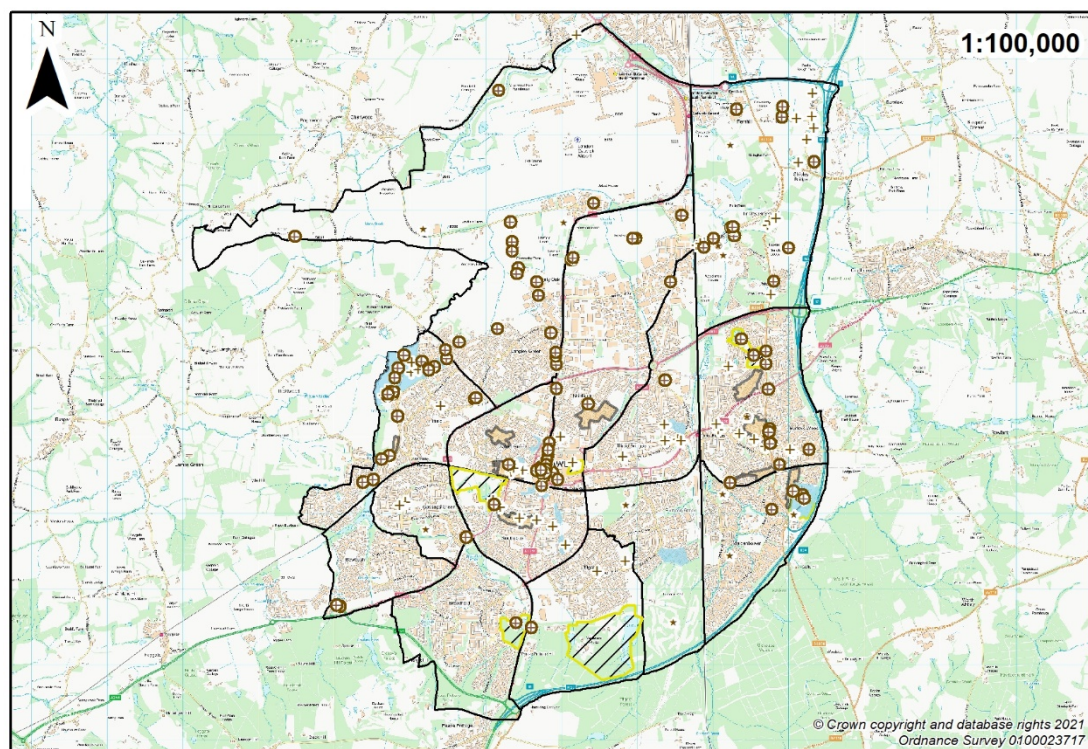
- 6.10 *To help inform the council's heritage policy approach, the Crawley Local Heritage Review (2020) reviewed and updated the borough's previous heritage evidence. Crawley Areas of Special Environmental Quality and Locally Listed Buildings Heritage Assessment (April 2010) undertook a comprehensive assessment of the town's heritage assets to review the status of Conservation Areas, Areas of Special Environmental Quality (ASEQs) now known as Areas of Special Local Character (ASLCs), Listed Building and Locally Listed Building designations. The findings from the Assessments form a key aspect of the Local Plan evidence base and should, in addition to other relevant policy documentation, be considered in the application of heritage policies.*
- 6.11 *Recording any heritage assets to an appropriate level<sup>58</sup> will ensure that a descriptive record of all heritage assets are maintained in the HER. This will in turn inform future proposals affecting heritage assets in line with the NPPF. With regard to the setting of any heritage assets, consideration should be had to Historic Environment Good Practice Advice in Planning Note 3: the Setting of Heritage Assets<sup>59</sup>.*
- 6.12 *As heritage assets within the borough are a limited and finite resource, development proposals must show through a Heritage Impact Assessment (HIA) how they preserve and enhance the asset. In the case of exceptionally significant development, the asset should be relocated as part of the development proposals. In exceptional circumstances when the asset is to be lost, it must be appropriately recorded and replaced with high quality development.*
- 6.13 *Some landscape features which enjoy policy protections for other reasons such as their contribution to biodiversity, structural landscaping, and open space may also have heritage significance, or contribute to the significance of other heritage assets, based on their contribution to local character and their recorded and continuing social, economic and cultural significance. These may include man-made features such as open spaces (covered in Policy OS1) as well as naturally occurring ones*

<sup>58</sup> "Understanding Historic Buildings. A Guide to Good Recording Practice" (2016) Historic England

<sup>59</sup> Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017) Historic England



such as ancient woodland and veteran trees (covered in Policy GI2). Where a Heritage Impact Assessment is being prepared it should include assessment of such significance where appropriate.



- ⊕ Listed Buildings (Policy HA1 & HA4)
- + Locally Listed Buildings (Policy HA1 & HA5)
- \* Archaeologically Sensitive Areas (Policy HA7)
- ⋆ Scheduled Ancient Monuments (Policy HA7)
- ▨ Historic Parks & Gardens (Policy HA1 & HA6)
- Conservation Areas (Policy HA1 & HA2)
- Areas of Special Local Character (Policy HA1 & HA3)

## Conservation Areas

6.14 In a Conservation Area, every building matters as well as the streets, public spaces and gardens between them – with each feature contributing to the unique character of the area. By understanding what gives each Conservation Area its special architectural or historic interest, it can be ensured that the special character and appearance of the area is preserved and enhanced. This is done with the use of additional controls over what can be done to buildings, trees and the overall appearance of the area.

6.15 The special character of these areas does not come from the quality of their buildings alone, but also from the historic layout of roads, paths and boundaries; characteristic building and paving materials; a particular ‘mix’ of building uses; public and private spaces – such as gardens, parks and greens; and trees and street furniture. Conservation Areas give wider protection to the area and setting, rather than focusing solely on individual buildings – all of the features within the area should be recognised as part of its character.

### Policy HA2: Conservation Areas

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

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



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

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

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

### **Reasoned Justification**

6.16 *Under the Planning (Listed Buildings and Conservation Areas) Act 1990, the council have a duty to determine which parts of their area are of a character or appearance of which it is desirable to preserve or enhance. They must then designate those areas as Conservation Areas. The approach to Crawley's heritage has been developed by using Historic Environment Good Practice Advice Notes 1, 2 and 3, published by Historic England.*

6.17 *In 2013, after a review of the borough's heritage, three new areas were designated and two existing areas were extended. There are currently eleven Conservation Areas in the borough, each very different in character and appearance, protecting New Town areas and much older parts of Crawley. The Conservation Areas are:*

- Brighton Road
- Dyers Almshouses
- Forestfields and Shrublands
- Hazelwick Road
- High Street
- Ifield Village
- Malthouse Road
- St Peter's and St John's
- Southgate Neighbourhood Centre
- Sunnymead Flats
- Worth.

6.18 *It is important to protect, maintain and enhance these areas for future generations to enjoy. The main objectives of Conservation Areas are to protect and enhance the area's architectural and historic interest, its distinctive layout and appearance, and the built and natural environment. It is, therefore, important to ensure that any alterations or development are consistent with, and respectful of, the special character or appearance of the area.*

6.19 *The NPPF encourages the local planning authority to consider the designation of Conservation Areas and to ensure that these areas justify such status because of their special architectural or historic interest. The council has carried out a detailed assessment of the borough's heritage and believes that the existing Conservation Areas are worthy of the status. In line with the significance and quality of these areas, the Policy sets appropriate requirements to ensure that development would result in their preservation or enhancement.*

- 6.20 *The council will from time to time review the boundaries of existing Conservation Areas and whether additional Conservation Areas should be designated, in accordance with the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF, and best practice guidance. The council is considering the recommendations of the Local Heritage Review 2020 with a view to potentially designating further Conservation Areas in due course. Where designated, the boundaries for these will be included on an updated Local Plan Map.*

### **Areas of Special Local Character**

- 6.21 As a result of Crawley's unique history the borough contains some areas which, though they may not possess sufficient heritage significance to justify their designation as Conservation Areas, are nonetheless of sufficient significance to warrant their identification as local or 'non-designated' heritage assets. These Areas of Special Local Character are identified on the Local Plan Map and in the council's updated Local Heritage List which will become a Supplementary Planning Document. Their significance is reflective of different phases of human activity and settlement within the borough, from the medieval period to the town's modern expansion. They should be afforded protection to prevent them being lost, incrementally or at once.

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

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

All development within an ASLC should demonstrate, as part of the Heritage Impact Assessment, how the proposals have regard to the area's significance as a heritage asset, including its character and appearance.

#### **Reasoned Justification**

- 6.22 *The "Crawley ASEQ's and Locally Listed Buildings Heritage Assessment 2010" reviewed the previous Area of Special Environmental Quality designation and concluded that some should be designated, whilst others de-designated or made a Conservation Area. The following revised criteria were used for the identification of these assets:*
- i. Homogenous and cohesive character;*
  - ii. Historic landscape features;*
  - iii. Landscape value, e.g. mature trees, hedges, grass verges;*
  - iv. Lower density housing in spacious landscaped setting;*
  - v. Architectural interest.*
- 6.23 *The 2020 Crawley Conservation Areas and Non-Designated Assets Review has considered this designation and the individual assets identified. The Review recommended the following amended criteria, which are consistent with those used to identify other non-designated heritage assets, and with Historic England best practice guidance<sup>60</sup>:*
- Authenticity;*
  - Aesthetic/Architectural Value;*
  - Historic Value;*
  - Social/Communal Value;*
  - Group Value;*
  - Landmark/Townscape Value;*
  - Archaeological Interest.*

<sup>60</sup> Local Heritage Listing: Historic England Advice Note 7 (2016) Historic England

- 6.24 *With these criteria in mind, the purpose of the ASLC designation is to provide an appropriate degree of protection and control in areas which possess local heritage significance.*
- 6.25 *The Local Plan Map identifies the following ASLCs:*
- *Albany Road/Spencers Road, West Green*
  - *Blackwater Lane, Pound Hill*
  - *Church Road, Pound Hill*
  - *Goffs Park Road, Southgate*
  - *Mount Close, Pound Hill*
  - *Milton Mount Avenue, Pound Hill*
  - *Northgate Neighbourhood Centre, Northgate*
  - *Rusper Road, Ifield*
  - *West Green Neighbourhood Centre, West Green*
- 6.26 *These will be included in the Local Heritage List SPD. The council will assess the merit of identifying new ASLCs through the review of the Local Plan Map and Local Heritage List, in consultation with local residents, and in accordance with robust criteria based on best-practice guidance.*
- 6.27 *The Local Plan Map and Local Heritage List may not be exhaustive in their inclusion of heritage assets which in fact possess significance in line with the stated criteria. Given the long history of human settlement and activity in the Crawley area, and the ongoing transformation of the environment through the urban development of the borough, further assets may come to light, including as part of the planning and development processes. This is particularly likely in the vicinity of existing groups of designated and non-designated heritage assets.*
- 6.28 *The NPPF<sup>61</sup> asks local authorities to set out a positive strategy for the conservation and enjoyment of the historic environment; this Policy achieves this by identifying special local heritage assets that should be preserved or enhanced and setting out the criteria required to achieve this.*

### **Listed Buildings and Structures**

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

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

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

Any changes must preserve or enhance the design and character of the Listed Building and have regard to its historic and architectural significance. A Heritage Impact Assessment is required to be submitted demonstrating how proposals will protect the significance of the listed building, including its setting and its key features.

Harm to, or loss of, the significance of a Listed Building will require clear and convincing justification, taking account of the grading of the building, and the degree of harm or loss, in line with national policy. Substantial harm to, or total loss of, the significance of a Listed Building will require exceptional justification, including benefits that outweigh the harm or loss, and further demonstration of either:

<sup>61</sup> National Planning Policy Framework, paragraph 185 (2019) MHCLG

- a. the public and substantial nature of the benefits concerned; or,
- b. the absence of an alternative use which averts the loss or harm and is consistent with:
  - i. the nature of the Listed Building; or
  - ii. medium-term viability; or
  - iii. the extent of potential opportunities for grant-funding, or not-for-profit ownership.

In cases where substantial loss or harm is justified, the council will require the building to have been recorded according to an agreed scheme of investigation which is proportionate to the importance of the Listed Building and the impact of the proposal. The record shall be submitted to the Historic Environment Record. Any development on the site of a demolished Listed Building must have regard to the character, form and heritage significance of the original building.

Development proposals involving ground works adjacent to or within the curtilage of a Listed Building will also need to respond to the site's archaeological potential in accordance with Policy HA7.

### **Reasoned Justification**

6.30 *There are 3 Grade I; 12 Grade II\*; and 89 Grade II Listed Buildings in Crawley. The oldest dating from the 10<sup>th</sup> Century: Saxon St. Nicholas' Church, Worth, Pound Hill, to the 20<sup>th</sup> Century: including The Beehive (1934-6) and the Friary Church of St. Francis and St. Anthony (1958-9). Their value is recognised at a national level and, as such, national policy protection is applied.*

### **Locally Listed Buildings**

6.31 There are many buildings within Crawley that are of particular local architectural or historical interest. These buildings are not considered to be of national significance but are local heritage assets that are irreplaceable. These buildings are a type of 'non-designated' heritage asset, recognised in national and local planning policy, and should be retained wherever possible, on account of their important contribution to the borough's heritage and character. Locally Listed Buildings are identified on the Local Plan Map and in the council's Local Heritage List.

### **Policy HA5: Locally Listed Buildings**

All development will seek to secure the retention of Locally Listed Buildings. Development should also maintain features of interest, and respect or preserve the character or setting of the building.

Development proposals affecting a Locally Listed Building must demonstrate in the Heritage Impact Assessment that the proposals take account of its heritage significance, including its setting and any heritage interest falling within the following categories:

- i) Age;
- ii) Authenticity;
- iii) Aesthetic/Architectural Value;
- iv) Historic Value;
- v) Social/communal Value;
- vi) Group Value;
- vii) Landmark/Townscape Value;
- viii) Archaeological Interest.

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

- a) reflect or retain the key features of the original building; and

- b) significantly outweigh the merit of retaining of the original building with regard to social, economic and environmental benefit to the wider area.

If demolition is seen to be acceptable, the building must first be recorded according to an agreed scheme of investigation which is proportionate to the importance of the Locally Listed Building and the impact of the proposal. The record must be submitted to the Historic Environment Record in consultation with the Local Authority.

### **Reasoned Justification**

- 6.32 *National planning guidance states that while the best examples of local vernacular building types will normally be listed, there are many other buildings which are valued for their contribution to the local scene or for their local historical association. It suggests that local planning authorities draw up lists of locally important buildings and formulate policies for their protection.*
- 6.33 *Crawley Borough Council previously revised its list of Locally Listed Buildings in 2010, when 58 buildings of local interest were identified. The adopted local list of buildings can be found on the council's website at [www.crawley.gov.uk](http://www.crawley.gov.uk).*
- 6.34 *The 2010 Local Buildings List will be superseded by the council's updated Local Heritage List, which will be based on assessment of heritage significance against the following criteria, taking account of the recommendations of the Local Heritage Review (2020), which are consistent with those used to identify other non-designated heritage assets, and with Historic England guidance on Local Listing<sup>62</sup>, to ensure consistency with similar local and national surveys:*
- Age;
  - Authenticity;
  - Aesthetic/ Architectural Value;
  - Historic Value;
  - Social/Communal Value;
  - Group Value;
  - Landmark/Townscape Value;
  - Archaeological Interest.
- 6.35 *The council will assess the merit of adding new locally listed buildings in consultation with local residents, and in accordance with robust criteria based on best-practice guidance, through the review of the Local Heritage List.*
- 6.36 *The Local Heritage List may not be exhaustive in its inclusion of heritage assets which in fact possess significance in line with these criteria. Given the long history of human settlement and activity in the Crawley area, and the ongoing transformation of the environment through the urban development of the borough, further assets may come to light, including as part of the planning and development processes. This is particularly likely in the vicinity of existing groups of designated and non-designated heritage assets.*

### **Historic Parks and Gardens**

- 6.37 Whilst Crawley does not have any Parks and Gardens of Special Historic Interest that are designated as nationally important by Historic England, the borough does contain man-made recreational landscapes which are of local importance from a heritage perspective. These Historic Parks and Gardens are local or 'non-designated' heritage assets identified on the Local Plan Map and in the council's Local Heritage List.
- 6.38 Historic Parks and Gardens are worthy of protection in the Crawley context for their heritage significance, including variously their age and rarity; their historic, archaeological, artistic and architectural interest; and their group value. This does not mean that development is always unsuitable in these areas but that the historic

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<sup>62</sup> Local Heritage Listing: Historic England Advice Note 7 (2016) Historic England



setting and character of that area must be respected or enhanced. Some Parks and Gardens are of particular interest as they were important features of the area before the development of the New Town, and some are intrinsically linked with the development of the New Town. These areas are now attractive landscaped areas which are locally valued, adding to the local character of Crawley.

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

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

All development proposals within the boundaries of a Historic Park and Garden, as identified on the Local Plan Map and Local Heritage List, will be required to demonstrate through a Heritage Impact Assessment:

- a. that the proposals have regard to the asset, its character, heritage significance, key features and setting; and
- b. that proposals respect or enhance the area.

In addressing this policy, developers should also respond to the value these sites have as structural landscaping (Policy CL6); open space (Policy OS1); green infrastructure (Policy GI1); and biodiversity sites (Policy GI3).

#### **Reasoned Justification**

6.39 *The identification of the Historic Parks and Gardens is supported by the 2020 Crawley Conservation Areas and Non-Designated Assets Review. The Review has recommended the identification of Historic Parks and Gardens on the basis of the following sub-criteria, which are consistent with the criteria used to identify other non-designated heritage assets, and with Historic England best practice guidance, while also reflecting in a proportionate way the criteria for designation of Nationally Registered Parks and Gardens<sup>63</sup>:*

- *Date and Rarity.*
- *Sites which reflect the development of taste.*
- *Sites which are early or representative examples of a style of layout or a type of site, or the work of a recognised designer (amateur or professional) of local importance.*
- *Sites having an association with significant persons or historic events.*
- *Sites with a strong group value with other heritage assets.*

6.40 *On the basis of these sub-criteria, the Local Plan Map and Local Heritage List identify the following Historic Parks and Gardens:*

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

6.41 *The council will assess the merit of identifying new Historic Parks and Gardens through the review of the Local Plan Map and Local Heritage List, in consultation with local residents, and in accordance with robust criteria based on best-practice guidance. The council will ensure that the concept of Historic Parks and Gardens is not devalued by only designating those areas of special interest identified through a*

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<sup>63</sup> Local Heritage Listing: Historic England Advice Note 7 (2016) Historic England; Urban Landscapes: Historic Parks and Gardens Selection Guide (2018) Historic England.



*robust assessment of their historic interest. The council assessment and the requirement for a Heritage Impact Assessment will serve to avoid or minimise conflict between the conservation of a Historic Park and Garden and any aspect of a planning proposal. This will ensure a balanced judgement is made having regard to the scale of any harm or loss and the significance of the heritage asset.*

- 6.42 *The Local Plan Map and Local Heritage List may not be exhaustive in their inclusion of heritage assets which in fact possess significance in line with these sub-criteria. Given the long history of human settlement and activity in the Crawley area, and the ongoing transformation of the environment through the urban development of the borough, further assets may come to light, including as part of the planning and development processes. This is particularly likely in the vicinity of existing groups of designated and non-designated heritage assets.*

### **Heritage Assets of Archaeological Interest**

- 6.43 Crawley's heritage assets of archaeological interest include four Scheduled Monuments and numerous other sites, including settlement remains, moated sites, and physical remains of the local iron industry. Further locations within the borough have known archaeological potential. West Sussex County Council has identified Archaeological Notification Areas which indicate the existence or probable existence of archaeological heritage assets.

#### **Policy HA7: Heritage Assets of Archaeological Interest**

Development proposals in the vicinity of a Scheduled Monument, or any heritage asset with archaeological interest which is demonstrably of equivalent significance (i.e. 'designated' archaeological assets), will be expected to preserve or enhance the asset and its setting, including through the protection of the asset from disturbance associated with development activity, and through the avoidance of patterns of movement or land use which may cause harm to, or loss of, the significance of an asset over time. Development should identify and pursue opportunities to better reveal the significance of such assets.

Development proposals affecting designated archaeological assets should be supported by a Heritage Impact Assessment demonstrating an understanding of the asset's significance, and how this has informed compliance with the requirements identified above.

Any harm to, or loss of, the significance of any designated or non-designated archaeological heritage asset involved in a development proposal will be considered in line with national and local policy, according to the significance of the asset and the degree of loss or harm.

This consideration will extend to cover heritage assets which are identified, or whose significance is re-evaluated, during the planning and development processes. In order to facilitate this, applications meeting the following thresholds should be supported by an Archaeological Desk-Based Assessment:

- ground works adjacent to or in the curtilage of a Listed Building;
- any activity within a Scheduled Monument;
- ground works within a Red Archaeological Notification Area;
- five or more residential units OR non-residential/mixed use development of over 0.2ha within an Amber Archaeological Notification Area;
- development outside an Archaeological Notification Area comprising 10 or more new units OR over 0.5ha of non-residential/mixed use development.

Subject to the findings of a Desk-Based Assessment, the council may require field evaluation and the recording and publication of results. In some cases, the council may require assets to be preserved in situ or excavated.

### **Reasoned Justification**

- 6.44 *Archaeological assets provide important evidence of earlier human activity within the borough. They are particularly sensitive to damage from development, and understanding of their significance may change as development takes place. Desk-Based Assessment should include the results of the Historic Environment Record (HER), relevant entries in the Heritage List for England, and other relevant sources. It should examine and define the likelihood of encountering archaeological finds or features of all periods on the site during development works, and identify the need for and scope of, any further evaluation that might be necessary to refine and conclusively address this question.*

## Open Space, Sport & Recreation

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

### Chapter Content

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

### The Key Issues

- 7.4 The number and quality of open space sites has come under increasing pressure from both new development and maintenance budgetary constraints. With the need for new housing, Crawley's economic role within the Gatwick Diamond, and limited development land, it may be that some of these sites are considered as a potential supply of land. It is important that a balance is struck between meeting development needs whilst continuing to ensure sufficient provision of high quality open space, recreation and sports facilities to meet the needs of existing and future residents.

### Local Plan Policies

#### Sport, Recreation and Open Space

- 7.5 This policy sets out the criteria the council will use to determine proposals that affect open space, sport and recreation provision.
- 7.6 It is important to ensure that there is an adequate supply of open space to serve the needs of both the existing and the future population of the borough. The Open Space, Sport and Recreation Assessment, Indoor Sports Facilities Assessment and Playing Pitch Strategy (2020) identified the standards for sport and recreation provision in the borough based on an assessment of the adequacy of existing provision, and the need for future sport and recreation development defined through consultation.
- 7.7 Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision<sup>64</sup>.

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<sup>64</sup> National Planning Policy Framework, paragraph 96 (2019) MHCLG

## Policy OS1: Open Space, Sport and Recreation

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

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

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

### **Reasoned Justification**

- 7.8 *Determining what open space, sport and recreation provision is needed (including the qualitative and quantitative deficits or surpluses) is a requirement set out in the NPPF<sup>65</sup>.*
- 7.9 *For the purposes of this policy, open space, sport and recreation facilities broadly fall into the following typologies:*
- *Indoor sports facilities;*
  - *Parks and gardens;*
  - *Natural and semi-natural open spaces;*
  - *Amenity green space;*
  - *Provision for children;*
  - *Provision for young people;*
  - *Outdoor sports facilities;*
  - *Allotments;*
  - *Cemeteries and churchyards;*
  - *Civic spaces;*
  - *Green corridors.*
- 7.10 *The emerging Open Space, Sport and Recreation Assessment, Indoor Sports Facilities Assessment and Playing Pitch Strategy (2020) establish Crawley's specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities. The standards within the studies provide guidance on where future provision of open space and recreation facilities is to be provided and where current provision is to be maintained.*
- 7.11 *Overall, Crawley is relatively well catered for with open space areas. However, distribution can be uneven which means that in some locations residents have further to travel to enjoy particular types of open space. The Open Space Assessment highlights the open space distribution by neighbourhood area. Whilst some open space is strategic in nature and the provision across the whole borough should be taken into account, this can be used as a starting point for understanding the needs of a specific location.*
- 7.12 *The studies identify a future deficit in most types of open space across the borough by 2035. To improve access and quality of Open Spaces, recommendations set out in each of the studies are to be integrated into designs for proposals at an early stage.*

<sup>65</sup> National Planning Policy Framework, paragraph 96 (2019) MHCLG

7.13 *The following Open Space Standards are established for the borough:*

Open Space Typology	Quantity Standards (ha per 1,000 population)	Accessibility/ Walking Standard	Quality Standards	Value Standards
Parks and Recreation Grounds	1.6	600 metres (12-13 mins walk)	The National Benchmark, based on Green Flag, should be applied so that sites obtain a Quality Score of 70% to ensure all sites achieve a Good Quality Score or above.	Sites obtain a Value Score of 60% and above to ensure all sites achieve a High Value Score.
Amenity Green Space	0.6	480 metres (10 mins walk)		
Natural Green Space	1.8	720 metres (15 mins walk)		
Play Space (Children)	0.05	480 metres (10 mins walk)		
Play Space (Youth)		600 metres (12-13 mins walk)		
Allotments	0.3	-		
Churchyards and Cemeteries	No Standard	-		
Civic Space	No Standard	-		

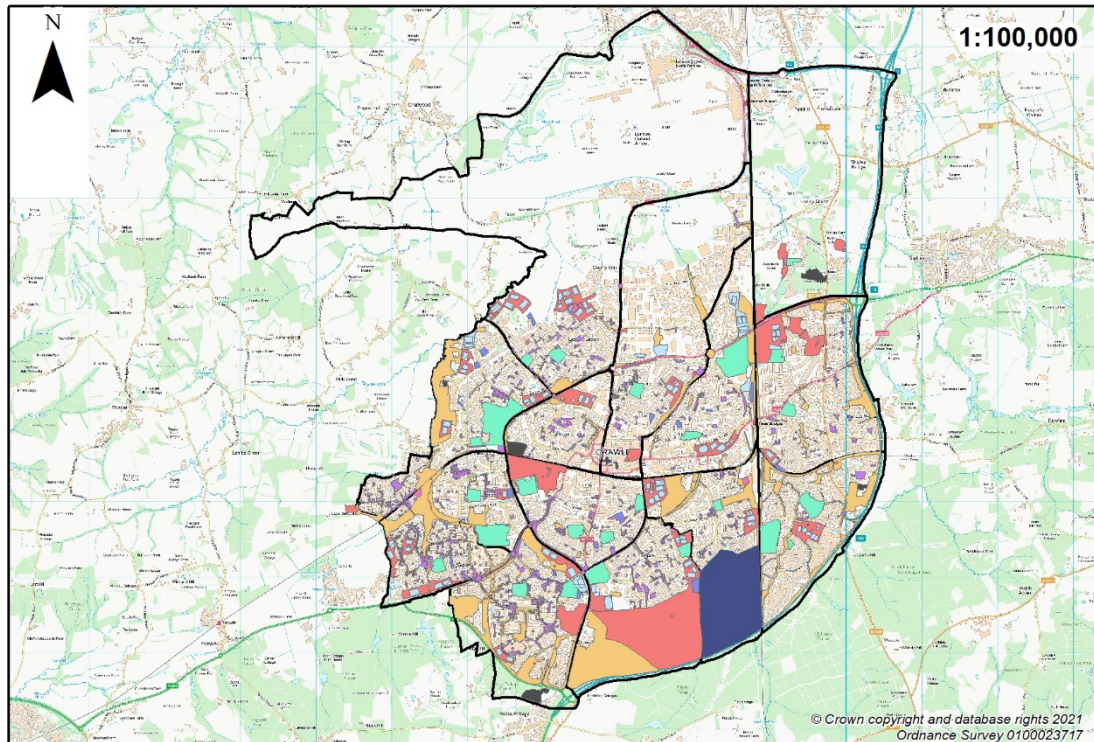
7.14 *The Open Space Study concludes that, where a proposed planning application shows that it would result in the loss of an open space, a quantity assessment should be carried out to understand if this would create a deficiency in that type of open space.*

7.15 *Where a quantity assessment evidences no deficiency, an assessment of the open space's historical, cultural, visual, amenity and ecological value should be undertaken to understand the full ramifications of its loss, including impact to the wider green infrastructure functions. The local planning authority will consider the quality and value of the site within the decision making process by considering:*

- *the quality and value assessment made as part of the council's Open Space Assessment (if the site was included in the full quality and value assessment), this will highlight what the loss would be in terms on the quality of the site and its values;*
- *any planning designations that apply to site, for example, is the site within a Conservation Area or in the setting of a Listed Building;*
- *all matters covered by an Environmental Impact Assessment, if appropriate.*

7.16 *The Open Space, Sport and Recreation Studies have mapped and audited Amenity and Natural Green Spaces larger than 0.2 ha. Sites smaller than 0.2 ha typically consist of roadside verges, roundabouts and incidental areas of grass. These sites are important contributions to the green infrastructure network within Crawley and can be areas of improvements to green infrastructure and biodiversity in line with Policy GI3. Proposals which affect these areas will also be considered against amenity impacts set out in Policy DD1. Replacement for the loss of these smaller sites, by equivalent or better provision of open space, can be provided in the form of smaller parcels, including areas smaller than 0.2 ha, where the loss is considered not to have an unacceptable harmful impact. However, for amenity and natural green spaces an assessment is only required for sites larger than 0.2 ha.*





<b>Open Space Sport and Recreation Typology</b>	Civic Space	Outdoor Sports Space (LA)
Allotments	Education	Outdoor Sports Space (Pitches)
Amenity Green Space	Golf Course	Parks and Recreation Grounds
Churchyards & Cemeteries	Natural Green Space	Play Space (Children)
	Outdoor Sports Space (Fixed)	Play Space (Youth)

7.17 *The Indoor Sports Facilities Assessment (2020) concludes that overall, Crawley has a good range of existing sport and leisure facilities across the area and there is sufficient pay and play accessible health and fitness provision to meet future demand. However, latent demand was identified in some areas and provision. The Assessment recommends that the existing facility mix across the town, as identified by the study, should be protected, with flexibility to adapt to support any growth of the town over the coming years.*

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

7.18 As Crawley grows, the population will increase putting pressure on existing open space and creating a demand for new open space and recreational facilities. Particularly in areas where there is a deficiency, new development can exacerbate this deficiency. It is important that as the town grows, so does the green infrastructure to support it.

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

The Open Space, Sport and Recreation Assessment, Indoor Sports Facilities Assessment and Playing Pitch Strategy (2020) provide an up-to-date evidence base on the surplus and deficits of provision in different neighbourhoods and are to be taken into account in meeting the demand for open space, sport and recreation arising from current and new development.

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

Way network both within the development and connecting to the surrounding countryside/open spaces.

Residential development creates a demand for open space, sport and recreation facilities. Depending on the characteristics and location of housing sites, on-site provision of open space may be appropriate and required as an integral part of the development to meet the needs arising from the increased population from the new residential units.

This will be proportional to the additional demand and impacts on open space generated by the development, using the borough's open space standards set out in paragraph 7.13 and the Open Space and Indoor Sports Facilities Assessments and Playing Pitch Strategy (2020) (and any subsequent updates). A site-specific assessment should be undertaken to determine the existing quantitative, qualitative and accessibility of public open space within the locality of the development.

Where the council agrees that such provision cannot reasonably be provided on site, the council will seek a financial contribution towards the enhancement of existing facilities in order to mitigate the increased demand. Details regarding the council's approach to seeking these contributions are set out in the Local Plan Planning Obligations Annex and further explained in the Green Infrastructure SPD.

Higher density development within the Town Centre will be expected to consider opportunities to provide on-site amenity open space, play space and community food growing space. A financial contribution will be expected, proportionate to the associated anticipated increase in population generated by the development, towards strategic sports pitch and ancillary facilities provision. Taking viability into account, higher density town centre developments will not be expected to provide a contribution towards parks and recreation spaces or natural green space. Imaginative design solutions suitable for high density, Town Centre style developments should be considered in meeting the biodiversity net gain requirement on-site (Policy GI3). Where provision of any of the open space typologies required from higher density development is agreed cannot reasonably be provided fully on-site, the council will seek financial contributions in line with the Planning Obligations Annex, the Green Infrastructure SPD and Biodiversity Net Gain guidance.

In addition, the impact of the increased population from residential development on open space and recreational facilities which particularly serve a borough-wide population will be mitigated by the use of the Community Infrastructure Levy.

Opportunities are encouraged to provide multi-use open space and/or indoor recreation provision, e.g. natural play areas, BMX tracks, Parkour sites, Public Rights of Way and other signed recreational routes, where there is an existing undersupply of these facilities and the negative impact on green infrastructure, including biodiversity and visual amenity, can be avoided.

### **Reasoned Justification**

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

7.20 *Recommendations from updated Open Space Studies include:*

- *protection and enhancement of existing open spaces – including improving quality and value;*

- provision of high quality new open space where feasible, to improve quantity and accessibility;
- enhancing and promoting space for food growing (including allotments);
- addressing provision of poor-quality ancillary and changing pavilion quality; and
- improving drainage and maintenance of pitches.

Further recommendations include securing community use agreements to invest in increased community access to existing facilities and establishing dialogue with other providers of open space, sport and recreational facilities.

7.21 Wherever possible, the council will consider opportunities for new and existing open spaces to deliver multiple functions, including:

- Recreation;
- Green travel routes;
- Aesthetic;
- Shading from the sun;
- Evaporative cooling;
- Trapping air pollutants;
- Noise absorption;
- Habitat for wildlife;
- Connectivity for wildlife;
- Heritage;
- Cultural;
- Carbon Storage;
- Food Production;
- Wind shelter;
- Learning;
- Water Storage;
- Water Infiltration; and
- Water Interception.

7.22 Community growing spaces have many mental and physical health benefits, as well as encouraging community cohesion, education and economic development through developing new skills and selling produce. Community food growing opportunities should be sought through new development and areas of derelict or underused spaces. A variety of sites can be utilised such as:

- Communal land on a housing estate;
- Waste ground and derelict sites;
- Land within parks;
- Land awaiting development;
- Rooftops;
- Hospital grounds or school grounds; and
- Allotments.

7.23 Access to natural greenspace is explained in more detail in Policy GI1, including Natural England's Accessible Natural Green Space Standard recommendations, the Woodland Trust's Woodland Access Standard and the council's local natural greenspace standard.

7.24 Where necessary, developer contributions from new housing secured through CIL will be used to assist in upgrading and refurbishing existing indoor sports facilities, as well as those that could contribute towards the development of strategic facilities, sports pitches and ancillary facilities, formal parks and recreation grounds, additional and safe walking, running and cycling routes, and where possible to open up other informal, multipurpose places and spaces where people can be active.

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

7.25 Public Rights of Way contribute to the character of the town by providing a means of active travel for residents and visitors as well as a recreational use. They provide a route for a sustainable means of transport to improve the physical and mental health of residents in Crawley. In order to ensure that public access to the countryside and the urban network of rights of way is maintained and enhanced, the council, as a local planning authority, will protect Public Rights of Way including footpaths, bridleways, byways and unclassified country roads.

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

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.

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

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

This may include:

- i) the provision of safe and convenient links to nearby Rights of Way/recreational routes; and/or
- ii) new or upgraded existing Rights of Way to multi-functional routes which improve environmental functions and visual amenity to create benefits for a range of users, such as for Non-Motorised Users (walkers, cyclists, equestrians, individuals with disabilities and impairments) and motorised disability users on the urban fringe of the town, with connections both inward to the centre, and outward to the wider countryside.

#### **Reasoned Justification**

7.26 *The NPPF<sup>66</sup> requires local planning authorities to protect and enhance Public Rights of Way and seek opportunities to provide better facilities for users. PROW's are an important network of roads and minor roads that facilitate safe travel for vulnerable users, walkers, cyclists and equestrians.*

7.27 *The footpath, cycle and bridleway links within and between neighbourhoods and from the town into the wider countryside form an important recreational role for the borough's residents and visitors. The importance of access to the countryside and the need to improve it, is emphasised in the West Sussex Rights of Way Improvement Plan and accompanying Project List. Although predominantly used for leisure activities, the Public Rights of Way network can also provide valuable intra-urban movements and schemes should also take full account of any existing Public Rights of Way within the borough. Improvements for motorised disability users would need to be carefully designed to ensure access is prevented for other motorised vehicles.*

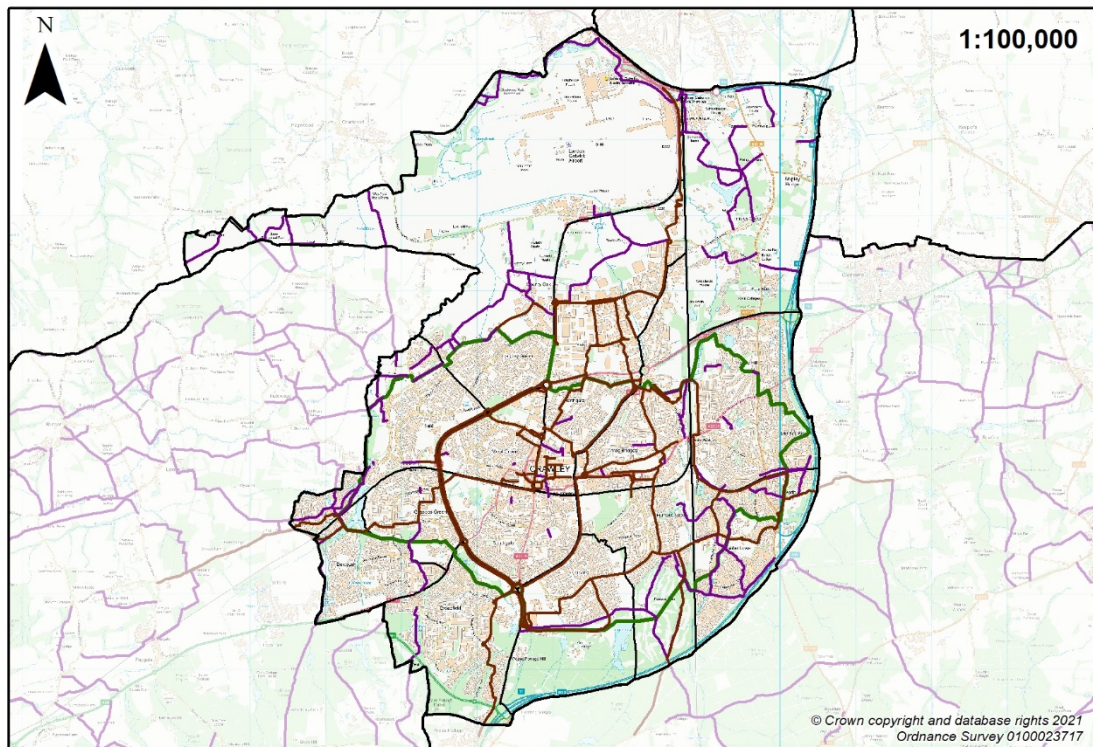
7.28 *The map below shows the current extent of Public Rights of Way (2019) in Crawley and surrounding boroughs as well as Crawley's Cycle Network and the Greenway that runs in a circle around Crawley. It is important to enhance sustainable transport options through well maintained PROW's. The map provides baseline evidence to where contributions towards Public Rights of Ways can be spent, for example, where increasing access to an area of open space through a PROW improvement can benefit the quality of life of new and existing residents living nearby. Several opportunities to enhance Crawley's PROW network are listed in the Green Infrastructure SPD<sup>67</sup>. Another positive approach would be to increase and enhance connections to Crawley's Greenway which is a circular route around the borough, taking into account the various types of users for a Public Right of Way. However,*




<sup>66</sup> National Planning Policy Framework, paragraph 98 (2019) MHCLG

<sup>67</sup> Green Infrastructure Supplementary Planning Document, pages 11-13 (2016) CBC



*individual site assessments should also consider what open space, sport and recreation activities and spaces are available within close proximity, using the council's accessibility standards, to a development's location.*



-  Crawley Cycle Network
-  Public Rights of Way
-  Greenway



## Infrastructure Provision

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

### Chapter Content

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

### The Key Issues

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

### Local Plan Policies

#### Infrastructure Provision

- 8.6 People that live and work in the town need to be supported by a wide range of infrastructure facilities and services to enable the town to function and to provide a high quality of life. This can be achieved by protecting existing infrastructure and ensuring that development can make provision for any additional infrastructure it requires.

## Strategic Policy IN1: Infrastructure Provision

Development will be permitted where it is supported by, and coordinated with, the delivery and maintenance of necessary infrastructure both on and off site (including where this infrastructure is located outside of Crawley but serves development within Crawley). For individual proposed developments this includes the provision of mitigation to avoid any substantial cumulative effects on the existing infrastructure services.

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

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

Where appropriate, developer contributions will be sought in the form of planning obligations to address site specific issues, in accordance with the tests in the CIL Regulations. The Planning Obligations Annex collates and sets out the anticipated planning obligations associated with the Policies established by this Local Plan.

### **Reasoned Justification**

- 8.7 *Infrastructure covers a wide range of services and facilities such as transport, education, health, social infrastructure, community facilities, cultural facilities, sport centres, open space, parks and play space, blue infrastructure, waste management and disposal, libraries, cemeteries, emergency services, places of worship, utility services, waste water treatment, telecommunications infrastructure and flood defences.*
- 8.8 *It is important that the necessary infrastructure and community services are made available for the whole community, for everyone to enjoy a high quality of life. The NPPF highlights the role that the planning system can play in identifying and coordinating the provision of infrastructure<sup>68</sup> and requires strategic policies to make sufficient provision for infrastructure<sup>69</sup>. The Infrastructure Plan sets out in more detail an assessment of infrastructure provision in Crawley. These facilities which make a contribution to the provision of infrastructure provision in the town will be protected unless alternative provisions are made. Where alternative provision is made this should be suitably located in terms of the functional requirements of the facility and the access requirements of the communities served, whether this be within or outside the boundary.*
- 8.9 *It is a fact that development will place additional demands on infrastructure provision and that developers will be expected to contribute to meeting the need for additional infrastructure generated by their development and ensuring cumulative effects are effectively mitigated. Development will be permitted where overall capacity limits, advised by infrastructure providers, are not breached. The council will charge developers the Community Infrastructure Levy (CIL) on appropriate development, in accordance with the council's adopted CIL Charging Schedule and the CIL Regulations (2010) as amended. Section 106 agreements will address relevant site specific issues to mitigate direct impacts on infrastructure in accordance with the relevant tests set out in CIL Regulation 122. The Planning Obligations Annex sets out the charges and calculations anticipated from the planning policies in this Local Plan and these have been subject to viability testing as part of the whole Plan and CIL Viability assessment, to support the Local Plan. The council's adopted*

<sup>68</sup> National Planning Policy Framework, paragraph 8a) (2019) MHCLG

<sup>69</sup> National Planning Policy Framework, paragraph 20b) (2019) MHCLG

*Supplementary Planning Documents provide additional guidance on the use of S106 agreements.*

- 8.10 *As required by the CIL Regulations the council will publish an annual Infrastructure Funding Statement concerning developer contributions. Statements for each financial year will be published before the end of the following December. They will set out the information required by the CIL Regulations, including:*
- An 'Infrastructure List', identifying infrastructure projects or types of infrastructure which the council intends will be, or may be, wholly or partly funded by CIL;*
  - A 'CIL Report', detailing CIL receipts, allocations and expenditure;*
  - A 'Section 106 Report', including details of new planning obligations ('Section 106 agreements') entered into, as well as details of receipts, allocations and expenditure.*
- 8.11 *The Water Cycle Study Crawley Addendum Report (January 2021) identifies that the flow permit for Crawley Waste Water Treatment Works is likely to be exceeded towards the end of the 2030 (near the end of the AMP8 period). Thames Water has confirmed that the works is close to its treatment capacity, and will exceed its permit during the Local Plan period. A new permit from the Environment Agency is likely to require a tighter Ammonia, Biochemical Oxygen Demand (BOD) and suspended solids consent, likely requiring an upgrade to achieve. It should be noted that in the event of an upgrade to 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 the sewer network under the Water Industry Act, the Infrastructure Provider may 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. It will be important to ensure that growth is aligned with delivery of additional capacity at Crawley Waste Water Treatment Works. 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. In case of major development, it is strongly recommended that developers engage with Thames Water, as the wastewater infrastructure provider, at the earliest opportunity to establish:*
- the development's demand for wastewater/sewage treatment and network infrastructure, both on and off site, and whether it can be met; and;*
  - what loading/flow from the development is anticipated.*

### **New Infrastructure Provision**

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

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

The council will support the provision of new or improved Infrastructure in appropriate locations where the facilities are required to support development, where they improve the medium- or longer-term resilience of infrastructure in Crawley, or where they add to the range and quality of facilities in the town.

The provision of community facilities alongside housing within sites allocated for uses including housing will be considered acceptable where:

- there is an evident need for the type of facility concerned;

- the infrastructure/facilities are suitable to meet the needs of the community served and the needs of future residents;
- the proposal complies with other policies in this Plan, including any site-specific requirements for additional or replacement services, facilities, enhancements, safeguards, investigations and other mitigatory measures.

Subject to the requirements above, education facilities may be considered acceptable as an alternative use on sites allocated for uses including housing where there is a demonstrated educational need arising in Crawley which cannot be met on another site.

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

Local community facilities should be located close to neighbourhood centres, in the Town Centre, or at suitable locations near Three Bridges Station.

### **Reasoned Justification**

- 8.13 *The NPPF highlights the need to make provision for sufficient infrastructure to support residents and businesses. As has been identified earlier, infrastructure covers a wide range of services and facilities. Where new facilities and services are provided, consideration needs to be given to their location depending on the number of trips generated and the use of the facility. The proposals will also need to be assessed against general development management policies.*
- 8.14 *The Infrastructure Plan recognises that there is an estimated need for around 6-8 additional forms of entry at secondary school level in Crawley during the course of the Plan and a new secondary school is therefore likely to be needed in the area. Due to Crawley's tightly constrained land supply, discussions are ongoing with WSCC and neighbouring authorities to consider secondary school provision to meet Crawley's needs as part of new strategic development close to Crawley. However, the Policy also makes allowance for consideration of education provision on sites within the borough allocated for uses including housing, should it not be possible to be met on an alternative site, particularly those currently or previously in education use.*
- 8.15 *Infrastructure facilities which generate a significant number of trips should be located in the most sustainable location where they can benefit from good public transport access and other suitable forms of transport.*
- 8.16 *Infrastructure which serves a neighbourhood catchment should be located close to neighbourhood centres. This will help maximise the accessibility of the site by foot and cycle as well as by public transport.*
- 8.17 *Other forms of infrastructure facilities which provide services but do not generate significant number of trips should be located in the most appropriate location, taking into account their impact on adjoining uses.*

### **Telecommunications and Broadband Provision**

- 8.18 The government requires the planning system to support the expansion of telecommunications systems and increase coverage of gigabit-capable full fibre infrastructure, which can support future technologies such as 5G, by prioritising full fibre connections to existing and new developments. Access to high quality digital infrastructure, and providing access to services from a range of providers, is important both in supporting economic growth and enhancing the provision to local communities.

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

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

All new employment and commercial development over 100sqm and residential development of one unit or more must have provision for gigabit-capable full fibre broadband to ensure that fibre or other cabling does not need to be retrofitted.

#### **Reasoned Justification**

- 8.21 *Through its Industrial Strategy, the government has expressly focused on building a 'full fibre future for Britain' to deliver digital infrastructure capable of providing today what the next generation will need tomorrow. The NPPF is clear that planning policies should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections (paragraph 112).*
- 8.22 *Crawley is part of the Greater Brighton Economic Region, one of the fastest growing city regions in the UK with a strong knowledge-based economy. A consistent message from businesses is that under-investment in infrastructure blocks growth and deters inward investment. This is reflected in Gatwick 360°, the Coast to Capital LEP Strategic Economic Plan, which identifies need to prioritise investment in a new standard of full fibre broadband connectivity between economic hubs, and the Gatwick Diamond Local Strategic Statement, which identifies the continued development and roll-out of superfast broadband as central to the promotion of sustainable economic growth across the Gatwick Diamond. Without the required level of investment, including in digital infrastructure, the full growth potential in the area will not be achieved. Exclusion from access to broadband can also reduce access to public services and employment opportunities, cause social isolation and mean that people may not be able to benefit from discounts for online billing or payments.*
- 8.23 *Despite the demand and potential economic benefits of full fibre deployment, the area lacks the fibre density in access networks and backhaul to ensure that local businesses have access to the infrastructure they need to innovate, differentiate and add value, so increasing the pace of economic growth. Increased speeds and data transmission and the demands of future technologies such as 5G will rely on higher frequencies, greater bandwidth and network densification. Without more high capacity fibre, carriers will be unable to support the projected minimum four-fold increase in mobile data traffic.*
- 8.24 *All the local authorities in West Sussex have agreed to work together to secure greater coverage of full fibre infrastructure by attracting further commercial investment, to support the expansion of key urban clusters across the county into gigabit towns and cities.*
- 8.25 *Retrofitting full fibre broadband into existing development is a costly and disruptive process. Therefore, measures to incorporate the fibre optic cables directly into new development, as part of the construction process, should be encouraged.*



## Economic Growth & Social Mobility

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

*As a progressive town, Crawley will strive to be the premier town between London and the South Coast providing jobs, learning and development opportunities and a leisure and cultural offer that is attractive to residents and visitors. Crawley will continue to be an economic leader, with a diverse, resilient and productive economy that meets the needs of the borough and supporting the overall prosperity of the region. An environment that supports and encourages new and established businesses to grow and flourish will be developed, and supporting necessary infrastructure, including telecommunications, will be enhanced. Crawley will be the first choice of business location for a variety of sectors and both domestic and international markets. Innovation, entrepreneurship and advanced technologies will thrive, and our community will benefit from access to high value, sustainable economic growth. Additional jobs will have been created for people living in and around the Crawley area across a diverse range of sectors, including creative industries. Access to jobs will be supported by learning and development opportunities giving people a real choice about the work they can and want to do.*

*Redeveloping and revitalising the Town Centre and further regeneration of the Manor Royal Business District, and identifying land for a new industrial-led Strategic Employment Location will reinforce the status of Crawley as the place to do business in the South East. Manor Royal will be seen as a premier business park, attracting sustained business investment that will deliver high value employment and higher levels of productivity and economic growth. Sustainable growth of Gatwick Airport will help to support the economic growth of the town, whilst opportunities for new employment land will be explored.*

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



## Economic Growth

- 9.1 Crawley is firmly established as one of the key economic drivers in the South East of England. The borough represents the geographic and economic heart of both the Gatwick Diamond sub-region and the wider Coast to Capital Local Enterprise Partnership (LEP) area, and through its excellent transport links Crawley continues to be well connected internally, nationally and internationally. It is home to a major international airport at Gatwick and Manor Royal, the region's premier business destination, employs over 30,000 people across an area of 240 hectares. Both are key drivers of the Crawley economy and that of the wider area. Development of key mixed use sites is revitalising the Town Centre as a place to do business, whilst the borough's other designated main employment areas perform an important economic function.
- 9.2 The Gatwick 360° Strategic Economic Plan 2018-2030, prepared by the Coast to Capital Local Enterprise Partnership, sets out the economic vision that Crawley, alongside the region's other major urban centres, will be ranked among the most productive places in the UK. Key to achieving this is the supporting of economic growth through the delivery of new business space and facilities, improved connectivity (including digital) and infrastructure, and delivering the necessary skills for a global economy, providing high-quality, well-paid jobs in the decades to come.
- 9.3 To promote the continued prosperity of the Gatwick Diamond and plan for its future growth, a Gatwick Diamond Local Strategic Statement<sup>70</sup> (LSS) has been prepared on a joint basis and endorsed by the two county councils and six local authorities covered by the area. The Statement sets out a commitment among local authorities to work together to promote the economic function of the Gatwick Diamond, recognising the strength of Crawley/Gatwick as a business location. Dovetailing with LEP objectives, the Gatwick Diamond LSS establishes priorities to support delivery of the floorspace needed for new and growing businesses, the skills needed to enable communities to access job opportunities within the Diamond, and the infrastructure to support sustainable economic growth.
- 9.4 The success of Crawley's economy, and that of the wider Gatwick Diamond and Coast to Capital LEP, is significantly driven by Gatwick Airport, which is recognised by Coast to Capital as accounting for £2.7 billion of economic activity in the LEP area. The COVID-19 pandemic has impacted substantially on the aviation sector and related businesses, and this has in turn impacted upon Crawley's economy, with Centre for Cities (2020)<sup>71</sup> estimating that over half of the borough's jobs fall within very vulnerable or vulnerable sectors. It is anticipated that Crawley's economy will respond and recover, with significant need for new business land and floorspace identified over the period to 2036. Given the significant land supply constraints faced within the borough, the Local Plan sets out a pro-active and ambitious economic strategy to support economic recovery in the shorter-term, whilst planning positively for economic growth and diversification, consistent with LEP and Gatwick Diamond priorities, and national planning policies, to ensure that sustainable economic growth can be delivered over the Plan period.

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<sup>70</sup> Gatwick Diamond Local Strategic Statement 2016 (April 2017) Chilmark Consulting on behalf of the Gatwick Diamond Authorities

<sup>71</sup> Centre for Cities (April 2020) What does the COVID-19 crisis mean for the economies of British cities and large towns?

## Chapter Content

- 9.5 This chapter sets out a coordinated approach, through strategic and spatial policies, that will enable Crawley to build on its economic strengths, maximise opportunities for growth and respond pro-actively to the challenges the borough faces over the Plan period. Drawing upon on the Northern West Sussex Economic Growth Assessment 2020 (as updated), Employment Land Availability Assessment<sup>72</sup>, Sustainability Appraisal/Strategic Environmental Assessment and Employment Land Trajectory (2020), the chapter sets out Crawley's employment land and floorspace needs over the 15 year period between 2021 and 2036, and outlines the economic strategy through which these needs will be planned for. Economic recovery is also a priority issue, with flexible policies to support employment growth and enable adaptation to change. Supporting the needs of residents and businesses through improving access to training and employment opportunities will be vital, now even more so as the economic impacts of the pandemic are felt. Through the economic policies in this chapter, and those set out in the following chapters relating to the Town Centre and Gatwick Airport, the Local Plan sets out the economic strategy to deliver sustainable economic growth in Crawley over the next 15 years.

## The Key Issues

- 9.6 The NPPF is clear that planning policies should help create the conditions in which businesses can invest, expand and adapt, setting out a clear economic vision and strategy that positively and proactively encourages sustainable economic growth<sup>73</sup>. Recognising the immediate economic situation facing the borough as a result of the Covid-19 pandemic, it is vital to plan positively to support economic recovery, particularly within the most affected aviation related sectors, whilst facilitating an expansion and diversification of Crawley's economy that will enable it to adapt to unforeseen economic circumstances that could otherwise hinder economic growth. It is also important that the Local Plan looks forward, planning pro-actively to meet Crawley's significant job growth, business land and floorspace needs as the economy recovers, whilst supporting delivery of the upskilling, connectivity and infrastructure needed to support economic growth.
- 9.7 Crawley borough is the leading economic driver in the Gatwick Diamond, forming the economic heart of the Coast to Capital Local Enterprise Partnership and Gatwick Diamond areas. With new businesses seeking to locate in the borough and existing businesses wishing to grow, there is a need for a minimum of 38.7ha new employment land in Crawley over the period to 2036. The scope to accommodate identified employment needs in Crawley has been severely constrained by the limited available land supply, which is significantly affected by the requirement to safeguard land in the north of the borough for a possible southern runway at Gatwick Airport. There remains a risk that if Crawley's employment needs cannot be accommodated within the borough, investment may be lost outside of Crawley, and indeed the sub-region entirely. It is therefore vital that a robust strategy is in place which plans positively to meet Crawley's employment needs, supporting the continued economic success of Crawley and the wider Gatwick Diamond and Coast to Capital areas.
- 9.8 To accommodate Crawley's employment needs, the Local Plan strategy focuses on the protection and intensification of the borough's existing main employment areas, and the identification of new employment land. Manor Royal will remain the economic heart of the Gatwick Diamond, and is protected and promoted for business-led economic growth that will build upon its established role and function as the Gatwick Diamond's leading business destination. Appropriate extensions to Manor Royal,

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<sup>72</sup> Employment Land Availability Assessment Base Date 1 September 2020 (January 2021) CBC

<sup>73</sup> National Planning Policy Framework, paragraph 81 a) (2019) MHCLG

located outside of the Gatwick safeguarded land, will be supported to help meet Crawley's business land needs. To accommodate Crawley's significant requirements for industrial and warehouse land, a Strategic Employment Location is allocated at Gatwick Green, with the safeguarded land boundary amended accordingly. Crawley's other designated main employment areas will remain the focus for a broad range of employment uses, and will be protected and intensified for economic growth to maximise the available employment land supply and ensure that their economic function is not undermined.

- 9.9 A pro-active approach is taken to adapt to economic challenges and respond to Coast to Capital LEP and Gatwick Diamond Initiative objectives. Increasing local access to skills and training is a priority, and a dedicated policy ensures that new development takes the opportunity for workforce upskilling. Flexibility is provided to support, reinvigorate and future-proof a local economy that has been significantly affected by the impacts of COVID-19. Policies are responsive to changing circumstances, encouraging a range of economic growth, including business-supporting uses and a dedicated business hub that enhances the offer at Manor Royal. Temporary cultural and creative uses are encouraged in main employment areas to stimulate activity, with high quality communications supported to cater for modern business needs. Barriers to investment are addressed, principally through ensuring the main employment areas are not undermined by non-employment uses that create economic uncertainty, and through simplifying the planning process to remove the NPPF sequential test requirement where offices are proposed in main employment areas, and where hotel and visitor accommodation is proposed within the Gatwick Airport boundary. Dedicated policies relating to Gatwick Airport and the Town Centre are covered in the two subsequent chapters.
- 9.10 Through this economic strategy, the Local Plan will support sustainable economic growth in Crawley, building upon the borough's existing strengths and responding to the challenges it faces. This will ensure that the leading economic role of the borough continues to go from strength to strength.

## Local Plan Policies

### Economic Growth

- 9.11 To inform the level of employment growth that is forecast to occur over the period to 2036, an Economic Growth Assessment (EGA, 2020) has been prepared for the Northern West Sussex Functional Economic Market Area, which in addition to Crawley Borough, is made up of Horsham and Mid Sussex Districts. The EGA provides detailed analysis of Crawley's economy, outlining forecast job growth, and corresponding floorspace and land supply needs over the next 15 years. This work has subsequently been updated (September 2020) to take account of additional sensitivity testing, including the potential economic impacts arising from the Covid-19 pandemic and having regard to priorities for economic recovery.
- 9.12 The EGA establishes a range of economic growth forecasts for Crawley in line with Planning Practice Guidance. Of these forecasts, the Local Plan employment land requirement is identified based upon Experian Baseline Job Growth projections, this representing the most appropriate basis for considering future employment land requirements from a labour demand perspective. Based on this forecast, the Local Plan identifies need for a minimum 38.7 hectares of new employment land to accommodate business<sup>74</sup> needs in Crawley Borough to 2036.

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<sup>74</sup> Business is defined as office, research & development, light industry, general industrial, or storage & distribution uses.

- 9.13 The identified need is significantly within the industrial<sup>75</sup> sector (32.8ha), with office needs accounting for 5.9ha of the total. Crawley's Employment Land Trajectory (Base Date 1 September 2020) identifies an available employment land supply pipeline of 17.6ha, which comprises 8.8ha office land and 8.7ha industrial land. The existing available office land supply meets identified quantitative office needs, though as discussed under Policy EC6, there remains a broader qualitative office need. In addition to new office land coming forward in Crawley, the Horley Strategic Business Park site allocation in Reigate and Banstead Borough will further add to the sub-regional offer. Therefore, Crawley's employment land needs are substantially of an industrial nature, principally in relation to B8 storage and distribution use. With an existing available industrial land supply pipeline of 8.7ha, there remains outstanding need for 24.1ha new industrial land.
- 9.14 This places a significant requirement on the Local Plan to ensure that suitable and appropriate employment land is available to meet business needs. In the first instance, it is vital that the limited existing available business land supply is not undermined. Therefore, the Local Plan protects Crawley's designated Main Employment Areas for employment use, maximising opportunities to support economic growth at these locations through the intensification of existing sites and efficient utilisation of land for employment uses. Manor Royal will remain a focus for business-led economic growth, and is protected and promoted for office and industrial uses, and other employment use that supports and does not undermine its core mixed business function. Other designated Main Employment Areas will continue to represent a focus for sustainable economic growth, including for business uses, but with greater flexibility for other appropriate forms of economic development. To supplement the employment land supply position and deliver new floorspace at Manor Royal, small extensions to Manor Royal, outside of the safeguarded land, will be supported where this would contribute positively to business-led economic growth.
- 9.15 However, these measures will not be sufficient to address what is a significant outstanding requirement for new industrial employment land, and to ensure that identified employment needs can be met in full, a Strategic Employment Location is allocated at land east of Balcombe Road and south of the M23 spur, referred to as Gatwick Green. This is the only location in Crawley that is capable of providing the required quantum of industrial land and floorspace without prejudicing the possible future delivery of southern runway on the safeguarded land. Requirements for the allocated site at Gatwick Green are set out in further detail under Policy EC4.
- 9.16 Taken as a whole, the Local Plan approach, in protecting and maximising the use of existing main employment areas for economic development, and identifying new land to meet Crawley's significant business needs, represents a positive and pro-active strategy to secure the sustainable economic growth required to support the economic role of Crawley and its wider sub-region.

### **Strategic Policy EC1: Sustainable Economic Growth**

Crawley's role as the key economic driver for the Coastal to Capital and Gatwick Diamond areas will be protected and enhanced. Suitable opportunities are identified within the borough to enable existing and new businesses to grow and prosper.

There is need for a minimum of 38.7 hectares new business land in the borough which, taking off the opportunities identified in the Employment Land Trajectory, results in an outstanding requirement for 24.1 hectares new industrial land over the period to 2036.

<sup>75</sup> Industrial is specifically defined as uses falling within Class B2 (general industrial) and Class B8 (storage & distribution).



Crawley's recognised economic role and function will be maintained and enhanced through:

- i) Building upon and protecting the established role of Manor Royal as the key mixed business location for Crawley at the heart of the Gatwick Diamond and Coast to Capital areas;
- ii) Ensuring that the borough's Main Employment Areas are protected as locations for sustainable economic growth;
- iii) Encouraging the redevelopment and intensification of under-utilised sites in Main Employment Areas for employment use;
- iv) Supporting small extensions to Manor Royal, outside of safeguarding, where this would deliver additional business land, and can be achieved in a manner that is consistent with other Local Plan policies; and
- v) Allocation of an industrial-led Strategic Employment Location at Gatwick Green, on land east of Balcombe Road and south of the M23 spur.

### **Reasoned Justification**

- 9.17 *Policy EC1 recognises the key sub-regional employment function that Crawley provides within the Gatwick Diamond and Coast to Capital LEP areas. It encourages sustainable economic growth by supporting the retention and intensification of the existing main employment areas for employment uses, and through the identification of new employment land to meet outstanding economic needs. The Economic Growth Assessment plays a key role in understanding qualitative and quantitative economic growth needs within Crawley and the Northern West Sussex Functional Economic Market Area. The work recognises that Crawley is well placed to adapt to the implications of Brexit, though faces immediate challenges from the economic impact of Covid-19 which has significantly affected Crawley's aviation sectors and related supply-chains. However, the Crawley economy is forecast to consolidate, recover and grow over the Plan period, necessitating the identification of new business land and floorspace if the borough, and more broadly the sub-regional economy, is to continue to thrive.*
- 9.18 *The EGA focuses on future job creation, new floorspace and land take requirements within the business sectors of office, research and development, light industry (these falling within Class E Commercial, Business and Service), general industrial (Class B2) and storage or distribution (Class B8). Other employment uses outside of these sectors vary significantly in terms of range, employment density and operational requirements, and are more challenging to plan for in land take and floorspace terms. Wider economic growth, outside of the business sectors listed above, is captured through the Crawley Retail, Leisure and Town Centre Neighbourhood Needs Assessment. Therefore, with Manor Royal identified as the focus for mixed business-led development, and Gatwick Green allocated for industrial-led growth, greater flexibility is afforded within the other designated Main Employment Areas in Crawley for business and other forms of economic growth.*
- 9.19 *Planning Practice Guidance requires local authorities to develop an idea of future economic needs based on a range of data and forecasts of quantitative and qualitative need. The EGA and the September 2020 update assess different forecasts of future economic growth in Crawley, including those based on Oxford Economics and Experian 2018 and 2020 which focus on growth in labour demand as well as assessing continuation of past business development rates, and labour supply based on population growth linked to housing need through the standard method. These produce a very wide range of business land requirements which are explained in more detail in the Economic Growth Topic Paper.*
- 9.20 *The Local Plan approach is to plan for sustainable economic growth based on the 2018 Experian Baseline Growth forecast of 38.7ha business land over the 15 years*

to 2036. This is considered to represent the most sustainable and appropriate basis on which to plan for economic growth in Crawley. It is based on up-to-date economic information, assuming strong job growth in Crawley, albeit at a slower rate when compared with past trends. It identifies need for 38.7ha new business land which is closely aligned with the Past Take-Up figure of 39ha, and greater than the Labour Supply (supply-led) 347dpa figure of 21.7ha. The higher Labour Supply (597dpa) figure of 56.9ha employment land does factor in the possibility of an urban extension to Crawley. However, it is recognised that such an extension would not meet solely Crawley's housing needs, and would also meet those from the adjoining district. Therefore, it is anticipated that, although some employment needs arising from an urban extension would need to be met in Crawley, remaining employment need arising from the development may be accommodated within the urban extension itself, or if necessary, elsewhere within neighbouring districts. The Oxford Economics 2018 Baseline forecast of negative growth does not factor in actual market performance or demand in Crawley and, therefore, does not represent an effective basis for planning positively for economic growth. Initial economic forecasts following the outbreak of COVID-19 are subject to a high degree of uncertainty and are also not considered to represent an appropriate basis for long-term planning. As such, the Experian Baseline Growth forecast requirement for 38.7ha business land represents a sound basis on which to plan for economic growth in Crawley.

- 9.21 Taking account of the available employment land supply pipeline, as explained in paragraph 9.13 above, Crawley is meeting its identified quantitative office land requirement, notwithstanding a wider qualitative demand in the sub-region for higher-specification Grade A offices. The outstanding business land requirement is therefore for industrial land, where there is need for a minimum 24.1ha, predominantly for B8 storage & distribution uses. This is summarised below.

	<b>Baseline Growth (Experian 2018)</b>
Office Requirement (ha)	5.9
Office Land Supply Pipeline (ha)	8.8
<b>Surplus/Shortfall (ha)</b>	<b>+2.9</b>
Industrial Requirement (ha)	32.8
Industrial Land Supply Pipeline (ha)	8.7
<b>Surplus/Shortfall (ha)</b>	<b>-24.1</b>

- 9.22 To help address the significant need for business land, Policy EC1 firstly protects the function of Manor Royal as the key destination for mixed business development, and safeguards all designated Main Employment Areas to protect their economic function, and as a consequence that of Crawley and the wider Gatwick Diamond. To maximise the use of Crawley's limited employment land supply, Policy EC1 supports the redevelopment and intensification of under-utilised sites in Main Employment Areas to maximise their efficient use. To respond to demand for additional business land, carefully planned minor extensions abutting the Manor Royal boundary may be appropriate. Should proposals come forward for these areas, regard must be had to the countryside setting of the site, its surrounds and context, given its location within the Upper Mole Rural Fringe (Policy CL8). Crucially, development in these areas should not prejudice the potential future delivery of a southern runway to the south of Gatwick Airport within the safeguarded land. Should any extensions be considered appropriate, development will need to demonstrate how it delivers additional business floorspace in line with Policy EC3. Following implementation, the site would form part of the Manor Royal Main Employment Area, and Policies EC2 and EC3 will apply.
- 9.23 However, this approach alone will not be sufficient to meet the outstanding need for a minimum additional 24.1ha industrial land. Therefore land at Gatwick Green is

*allocated for the delivery of a high-quality industrial-led Strategic Employment Location. The Strategic Employment Location will be expected to meet, as a minimum, Crawley's outstanding industrial land requirement of 24.1ha, and must be planned in a manner that is complementary to the established role of Manor Royal as a strong and competitive mixed business district and also the office-focused Horley Strategic Business Park allocation in Reigate & Banstead Borough.*

## **Main Employment Areas**

- 9.24 Crawley's economy is characterised by its range of employment areas, each of which has an established character and function, and performs an identified role. The Main Employment Areas represent a focus for sustainable economic growth, and given the significant employment land requirement and limited available land supply pipeline, the council's evidence base makes clear that the existing Main Employment Areas should continue to be a focus for sustainable economic growth. Therefore, Policy EC2 seeks to protect and improve the existing economic areas, maximising the potential to utilise existing employment sites.
- 9.25 Manor Royal, Gatwick Airport and Crawley Town Centre represent key economic locations, and are identified as Main Employment Areas. Given the fundamental role performed by each in driving the Crawley and Gatwick Diamond economy, individual location-specific policies for each are established through Local Plan Policies EC3, GAT1-4 and TC1-5 respectively. In addition to these spatial policies, Policy EC2 also applies to the designated Main Employment Areas of Manor Royal, Gatwick Airport and Crawley Town Centre.
- 9.26 Crawley's remaining Main Employment Areas as identified within Policy EC2 are: Three Bridges Corridor (including Denvale Trade Park, Spindle Way, Stephenson Way and Hazelwick Avenue), Maidenbower Business Park, Tilgate Forest Business Centre, Broadfield Business Park, Lowfield Heath, Broadfield Stadium and K2 Crawley, and The Hawth Theatre. The role and function of these Main Employment Areas for economic development use will be protected, and further intensification for employment uses within these locations will be supported.
- 9.27 This approach dovetails with the objectives of other policies and the wider Local Plan Vision which directs employment generating uses to the Main Employment Areas as sustainable and appropriate locations for economic growth. Given the need to balance use of the available land supply for economic and housing needs, the loss of employment land and floorspace criteria of Policy EC2 will not apply where sites are allocated for housing under Local Plan Policy H2.

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

As a key economic driver in the sub-region, Crawley's Main Employment Areas make a significant contribution to the economy of the town and the wider area, and are designated as a focus for sustainable economic growth.

The Main Employment Areas are:

- Manor Royal;
- Crawley Town Centre;
- Gatwick Airport;
- Three Bridges Corridor (including Denvale Trade Park, Spindle Way, Stephenson Way and Hazelwick Avenue);
- Maidenbower Business Park;
- Tilgate Forest Business Centre;
- Broadfield Business Park;
- Lowfield Heath;

- Broadfield Stadium and K2 Crawley;
- The Hawth.

Employment generating development will be supported in the Main Employment Areas where it makes for an efficient use of land or buildings and contributes positively to sustainable economic growth in the Main Employment Area, and to the overall economic function of Crawley.

Development that would involve a net loss of employment land or floorspace in any Main Employment Area will only be permitted where it is demonstrated that:

- i. the site is no longer suitable, nor viable, nor appropriate for employment purposes, or that a limited loss of employment floorspace will support the wider economic use of the site; and
- ii. the loss of any land or floorspace will result in wider social, environmental or economic benefit to the town which clearly outweighs the loss; and
- iii. there would be no adverse impact on the economic function of the Main Employment Area, nor the wider economic function of Crawley.

### **Reasoned Justification**

9.28 *The approach set out in Policy EC2 supports the established role of the Main Employment Areas as destinations for sustainable economic growth. Each performs a different but vital role in helping to meet economic needs in Crawley. The largest Main Employment Areas are Manor Royal, the leading business destination in the Gatwick Diamond; Crawley Town Centre, a focus for Main Town Centre uses and a sub-regionally significant centre; and Gatwick Airport, a key location for airport-related employment. The borough's other Main Employment Areas perform an important complementary role, supporting a range of employment uses that includes small businesses, offices, and high quality leisure facilities. The Main Employment Areas, individually and collectively, play a vital role in supporting sustainable economic growth in Crawley and that of the wider Gatwick Diamond. Therefore, Policy EC2 ensures that the economic role and function of each Main Employment Area is protected and strengthened to support economic growth. The Policy also seeks to ensure that the important economic function of the Main Employment Area is not undermined and potentially compromised by inappropriate non-employment development. To further protect the employment function of the borough, Article 4 Directions are in place for several Main Employment Areas to control changes of use to residential.*

### **Crawley's Main Employment Areas**

#### **Manor Royal: A premier location for business**

9.29 *Covering an area of 240 hectares, Manor Royal is the Gatwick Diamond's leading business district, accommodating over 600 businesses and just under 28,000 jobs. Its strategic location between Brighton and London, proximity to Gatwick Airport, and excellent transport links, places Manor Royal at the heart of the Gatwick Diamond. Through the Manor Royal Business Improvement District (Manor Royal BID), ongoing projects will help to build upon the Manor Royal brand and deliver the improvements sought by business. The Local Plan has a key role to play in supporting the business-led economic role of Manor Royal, supporting its key business focus, and setting in place a framework for wider improvements that will enable Manor Royal to go from strength to strength. The specific policy approach for Manor Royal is set out at Policy EC3.*

#### **Crawley Town Centre: A sub-regional shopping and leisure destination**

9.30 *Crawley Town Centre is the main shopping and leisure destination in Crawley borough, and is a key shopping destination for people living in the wider sub-region.*

*It contains a good range of shops, restaurants, cafes and bars, as well as entertainment uses at Crawley Leisure Park, all of which contribute to the overall attractiveness of the town centre as an enjoyable place to visit. As a centrally located and highly sustainable location, around 13,500 people work in the Town Centre. A growing residential population, alongside an ambitious regeneration programme, is further enhancing its vitality as a place. Specific policies for Crawley Town Centre are set out at Policies TC1 to TC5.*

#### Gatwick Airport: An international airport

9.31 *During 2018/19, Gatwick Airport served 46.4 million passengers, a figure that the Gatwick Airport Master Plan forecasts to grow to 61 million passengers per annum (mppa) by 2032 within the current two terminal, single runway operation, and potentially to 70mppa by 2032 should the government allow the operational use of its existing standby runway. As a hub for employees and visitors, and a key economic driver through direct or indirect employment, the airport is central to the function of the wider economic area, and within its current configuration, in 2019 the airport provided 24,000 on-airport jobs within the Main Employment Area. Specific policies for Gatwick Airport are set out at Policies GAT1 to GAT4.*

#### Three Bridges Employment Corridor

9.32 *The Three Bridges Employment Corridor is situated in a highly sustainable location between Three Bridges railway station and Crawley Town Centre, and includes Denvale Trade Park, Spindle Way, Stephenson Way and Hazelwick Avenue. It supports a diverse range of economic uses including office, light storage, distribution, trade, car showroom and automotive uses, across generally older and smaller units.*

#### Maidenbower Business Park, Tilgate Forest Business Centre, Broadfield Business Park

9.33 *These small scale business parks, situated adjacent to main road interchanges, provide a range of floorspace typologies, including offices, car dealerships, and commercial leisure.*

#### Lowfield Heath

9.34 *A traditional industrial estate, accommodating a wide range of light industrial and some non-business uses, the area is located adjacent to the southern perimeter of Gatwick Airport. There is a range of building stock, with regard to size and use, and the site provides a complementary employment role close to Manor Royal. This Main Employment Area is situated within the Safeguarded land for Gatwick Airport, and applicants should also refer to Local Plan Policy GAT2.*

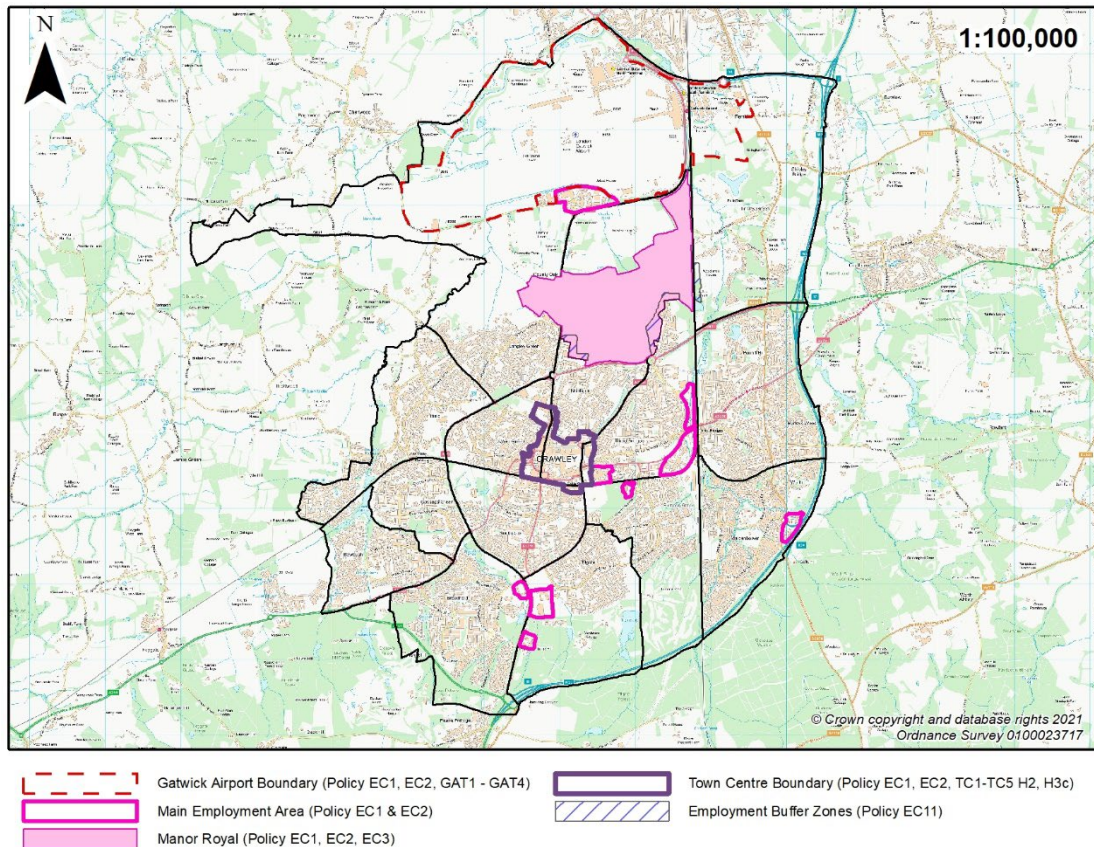
#### Broadfield Stadium and K2 Crawley

9.35 *These Main Employment Areas make an important contribution to the leisure and sports sector of the economy, accommodating Crawley Town Football Club and K2 Crawley, both of which provide a key commercial leisure offer within Crawley and also serve its wider catchment.*

#### The Hawth Theatre

9.36 *The Hawth Theatre is an arts, culture and entertainment complex, situated around 0.5 miles from Crawley Town Centre, adjacent to an expanse of ancient woodland in Southgate Park. It is a focus for creative and cultural uses in Crawley, and in addition to its theatre function, it contains a dance studio, learning and meeting space, and conferencing facilities.*





## Manor Royal

- 9.37 Manor Royal is the principal business location in the Gatwick Diamond, leading the way as a destination for industrial and office focused economic growth. At approximately 240 hectares, with over 600 businesses and providing around 28,000 jobs, Manor Royal is critical to the economic function of Crawley and also that of the wider sub region. It is one of the largest mixed use business areas in the South East, with excellent transport links providing access to a wide catchment of suppliers, customers and staff. Situated just 30 minutes from both Brighton and London, it is a focal location for employment at the heart of the Gatwick Diamond and Coast-to-Capital Local Enterprise Partnership areas. The presence of the Manor Royal BID adds further strength to the business district, developing the Manor Royal brand, delivering wider enhancements to support the function of the area, and lending a collective voice to its businesses.
- 9.38 The ambition for Manor Royal relies on the systematic enhancement of its existing strengths of scale, diversity, connectivity and location. Key to this approach is a priority focus on business uses within Manor Royal, ensuring that its core business function is maintained and enhanced to promote a high-quality environment that supports the operation and growth of existing businesses and attracts new business investment. There is also a recognised need for supporting facilities and staff amenities that are of an appropriate scale and function to support the day-to-day needs of Manor Royal businesses and employees. These may potentially be accommodated in the form of a dedicated business hub that is capable of achieving genuine step-change at Manor Royal, but may also come forward at a smaller scale on an individual standalone basis. Therefore, the Local Plan applies flexibility for non-business development where it can be demonstrated that this will help address existing deficiencies and would support Manor Royal's core business function. There is also need to support, through good design and landscaping of all development,

aesthetic improvements to the Manor Royal environment, helping ensure it remains a successful and desirable business location.

- 9.39 By using positive planning to facilitate business-led development in the area, and improve the quality of the environment, the council, in partnership with the Manor Royal BID, local businesses, and other stakeholders will support Manor Royal through:
- providing an environment that supports and encourages business growth;
  - building on the unique business and physical attributes afforded by its location and history; and
  - enabling an attractive and desirable working environment.

### Policy EC3: Manor Royal

Manor Royal is the principal business location for Crawley, and instrumental to the success of the wider Gatwick Diamond.

Development that is compatible with the area's economic function and role in the wider sub-region will be permitted where it falls within the business sectors of office, research and development, light industry, general industrial and storage or distribution and would result in the reuse, intensification, or change of use of the land or buildings.

Development outside of the sectors identified above will be permitted where it can be demonstrated that it is of a scale and function that supports, and does not undermine, the established business role and function of Manor Royal. Such development may be provided on a standalone basis, or on a comprehensive basis through a dedicated business hub that is capable of addressing the current lack of supporting business facilities or staff amenities. Any business hub should be sustainably located and will be expected to provide genuine step-change that enhances the business function of Manor Royal.

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

Where developments in Manor Royal involve a net increase in gross internal area in excess of 100sqm, the council will seek a proportionate financial contribution towards public realm improvements in Manor Royal, subject to appropriate projects being identified, as set out in the Local Plan Planning Obligations Annex.

### **Reasoned Justification**

- 9.40 *Manor Royal has performed well over recent years and continues to represent a dominant business cluster within the Gatwick Diamond and wider south east. It is home to the largest critical mass of businesses in Crawley, its total 866,000sqm commercial floorspace, includes 227,000sqm office floorspace (26% of total floorspace), 187,000sqm industrial (22%), and 379,000sqm warehousing (44%)<sup>76</sup>. Despite declining land availability, new stock continues to be delivered, underlining Manor Royal's economic vibrancy and attractiveness to a diverse mix of business occupiers and activity.*
- 9.41 *As is the case for Crawley as a whole, the limited available land supply at Manor Royal represents a challenge, presenting an obstacle for existing businesses seeking to grow, and also for new businesses seeking to locate in the business district. Therefore, the Local Plan takes a positive approach to support Manor Royal and*

<sup>76</sup> Manor Royal Economic Impact Study (2017) Lichfields

*reinforce its role as the leading business destination for Crawley and the Gatwick Diamond. Key to its approach is support for B-class business development within Manor Royal, ensuring that its principal business function is maintained and enhanced, whilst adding to the overall business land-supply pipeline. Flexibility is provided for other employment and ancillary uses where these are of a scale and function that would support Manor Royal's business function.*

- 9.42 *To protect the business function of Manor Royal, a number of Article 4 Directions are in force. These remove permitted development rights that had previously allowed the change of use of B1a offices, B1c light industrial, and B8 warehouses premises to convert to residential. The Article 4 Directions are in place as residential use is amenity-sensitive, and is not compatible with the operation and function of a working business district.*
- 9.43 *There remains a recognised need to improve access to complementary business facilities and staff amenities within the business district, which are needed to support the day-to-day needs of Manor Royal businesses and employees. This includes facilities for meeting room hire and conferencing; childcare; small-scale convenience retail; café and restaurant uses; leisure and health; open space, and also facilities that would support sustainable access, for example, electric vehicle charge points or cycle parking. Such facilities will be supported where it is demonstrated that development is of a scale and function that supports, and does not undermine, the core business function of Manor Royal. The Manor Royal Economic Impact Study (2017) advises that, unlike many of its competitors, Manor Royal lacks a dedicated hub that is designed specifically with business users in mind. A facility of this nature would provide opportunity to cluster several of the required business support facilities and staff amenities in a centrally located business hub, helping reinforce the Manor Royal brand, and potentially achieving a genuine step-change to support the business district in responding effectively to existing and emerging competitors.*
- 9.44 *As Manor Royal was purpose-built as part of the original Crawley New Town, it is not planned out in the way that more modern business parks are today, and its physical and aesthetic environment has in places inevitably declined. The Local Plan will ensure that development in Manor Royal is of a high design quality and delivers suitable landscaping to support improvements to the overall environmental quality of the business district. The Manor Royal Design Guide Supplementary Planning Document will continue to play a key role in guiding the delivery of qualitative improvements to the business district's environment through the implementation of high quality design standards, particularly at key gateway sites and frontages.*
- 9.45 *To support ongoing improvements to the Manor Royal environment, a developer contribution will be sought towards public realm improvements. Subject to the quantum of development proposed, this may take the form of a financial contribution towards specified projects identified by the council in liaison with Manor Royal BID, or where the financial contribution sought would be £500 or less, through appropriate on site provision to be negotiated with the council. Specific projects will be identified by the council in liaison with the Manor Royal BID. Further detail is provided in the Local Plan Planning Obligations Annex.*
- 9.46 *Crawley Goods Yard and railhead is located within Manor Royal and provides an important function in the processing and bulk transportation of minerals and aggregates. As required by the NPPF, the existing railhead and associated storage and handling facilities are safeguarded from other forms of development through Policy M10 of the West Sussex Joint Minerals Local Plan (2018). West Sussex County Council (WSSCC) should be consulted in relation to any planning proposals at, or within 250m of Crawley Goods Yard.*

## Strategic Employment Location

- 9.47 Land east of Balcombe Road and south of the M23 spur, known as Gatwick Green, is allocated for the development of a Strategic Employment Location that will contribute significantly to meeting Crawley's substantial need for new industrial and warehouse land and floorspace. The site is strategically located in proximity to Gatwick Airport, Manor Royal Business District, and the Horley Strategic Business Park site allocated by Reigate & Banstead Borough Council. It offers significant opportunity to deliver the type and quantum of industrial-led business floorspace that is needed to maintain and enhance Crawley's leading role as an economic driver of at the heart of the Coast to Capital LEP and Gatwick Diamond areas, and can be delivered without prejudicing the delivery of a new southern runway at Gatwick Airport, should that be supported by the Government.
- 9.48 As identified by Strategic Policy EC1, over the period to 2036 there is need for provision of up to 38.7 hectares new business land in Crawley. Of the total business land requirement, office needs account for 5.9ha, which, taking account of the identified office land supply pipeline of 8.8ha, can be accommodated at sites identified in the Employment Land Trajectory. As such, the business land supply shortfall relates purely to industrial land, substantially within the storage & distribution (Class B8) sectors, where there is a total need for 32.8ha land. With the Employment Land Trajectory identifying an existing supply pipeline of 8.7ha land within these sectors, this results in an outstanding need of around 24.1ha industrial land.
- 9.49 Given the specific nature of the identified need, the allocated Gatwick Green Strategic Employment Location will be substantially led by the provision of industrial, storage and distribution floorspace, supported by other ancillary uses that are of an appropriate scale and function. Through expanding the range and quantum of business floorspace within Crawley, Gatwick Green will support the growth of existing Crawley businesses and attract new investment to the borough, enabling market demand for industrial and warehouse space in Crawley, which has to date been frustrated by a constrained land supply position, to be accommodated within the borough. This offer will be complementary to the mixed business function of Manor Royal, and the office-led development of Horley Strategic Business Park which is allocated in the Reigate & Banstead Borough Council Development Management Policies DPD.

### Strategic Policy EC4: Strategic Employment Location

Land east of Balcombe Road and south of the M23 spur, referred to as Gatwick Green, is allocated for the comprehensive development of an industrial-led Strategic Employment Location.

#### Requirements

Proposals for development of the Strategic Employment Location will be required to:

#### *Employment Uses*

- a. provide as a minimum 24.1ha new industrial land, predominantly for B8 storage and distribution use, demonstrating through appropriate evidence the justification for any further industrial floorspace beyond this amount;
- b. justify any limited complementary ancillary uses such as office floorspace, small-scale convenience retail and small-scale leisure facilities that would support the principal industrial-led storage and distribution function.

#### *Movement and Accessibility*

- c. Demonstrate through a Transport Assessment that appropriate access can be provided to the site having regard to both employee and operational movements. This must demonstrate that there will be no severe residual impact on the local and



strategic road network, taking into account the operation of Gatwick Airport as nationally significant infrastructure, the allocated Horley Strategic Business Park, and the impact of committed developments in the borough and surrounding areas.

- d. Demonstrate through a comprehensive Mobility Strategy how the development will include measures and improvements to maximise sustainable access to the site, focusing on how the development will optimise the usage of sustainable modes of transport as opposed to the private vehicle, and detailing infrastructure improvements that will be required to adequately mitigate the development impacts on the highways network, detailing how these improvements will be delivered and operated. Highways infrastructure and improvements that are required as a result of impacts arising from the development must be delivered as part of the development. On the basis that the development will be required to address its own highways impact, a S106 sustainable transport contribution will not be sought.
- e. Provide improvements to public transport facilities, including existing bus infrastructure, and measures to maximise the accessibility of routes/services to future occupiers in and around the site.
- f. Upgrade and extend pedestrian/cycle routes to the site from residential areas in Crawley and Horley and from Gatwick Airport station.
- g. Provide appropriate levels of on-site parking solely for the uses on the site and ensure measures are in place to ensure no airport-related parking occurs.
- h. Submit air quality modelling alongside the Transport Assessment, to include consideration of cumulative impacts

#### *Sustainable Design and Construction*

- i. Achieve an exemplar development in sustainability terms, achieving BREEAM Excellent rating, and demonstrating how the development will achieve Net Zero emissions and carbon neutrality by 2050
- j. Implement an energy strategy developed in accordance with the hierarchy set out in Policy SDC2
- k. Demonstrate, through a Flood Risk Assessment and Surface Water Drainage Strategy, how drainage and flood risk (including cumulative flood risk) will be taken into account in the design and layout of development, and appropriately mitigated to ensure that the development is safe in flood risk terms and does not increase flood risk elsewhere;

#### *Digital Technology*

- l. Support the needs of 21<sup>st</sup> century business through the delivery of high quality communications infrastructure including gigabit capable full fibre broadband.

#### *Character and Design*

- m. Be designed and laid out to achieve an appropriate transition to, and relationship with, neighbouring residential and countryside areas, including through appropriate height, massing and siting of buildings and suitable consideration of shared boundaries to include measures to reinforce existing tree and hedgerow screening. Particular regard should be had to the location of the site in the North East Crawley Rural Fringe landscape character area.
- n. Ensure the height and design of buildings, lighting and other design aspects are consistent with the operational standards of Gatwick Airport and to respect aerodrome safeguarding requirements and the Public Safety Zone.
- o. Include an appropriate landscape buffer, and public open space, to reinforce the distinctive identity of Gatwick Green Strategic Employment Location, and its separation from Gatwick Airport, Horley, and the wider countryside setting of the site.
- p. Provide buildings of an exemplar standard of design to reflect the Strategic Employment Location concept including sufficient flexibility to provide adaptability to cater for a range of, expanding and established businesses and major occupiers and to be complemented by high quality public realm.



- q. Protect and enhance ancient woodland, existing trees and hedgerows where possible and enhance the green/blue infrastructure on site, including the Gatwick Wood Biodiversity Opportunity Area.
- r. Ensure the design of buildings provides appropriate interior environment for users, having regard to the impacts of noise from existing and future sources, particularly air traffic and the M23. Mitigate noise intrusion from activities on the site to adjacent residential and open areas.
- s. Provide measures to minimise the impact of lighting upon neighbouring residential and adjoining countryside areas.
- t. Ensure development proposals have regard to conserving the setting of the Listed Buildings at Donkey Lane and Fernhill Road and the locally listed building at Rivington Farm. The retention of important hedgerows will be encouraged as will retention of a buffer to the green corridor along Balcombe Road to retain the historic landscape character.

### **Impact Assessment**

It must be demonstrated how the Strategic Employment Location will address Crawley's identified need for industrial focused business floorspace, and how its offer will be complementary to the mixed-use business function of Manor Royal, the vitality and viability of Crawley Town Centre, delivery of the allocated office-led Horley Strategic Business Park in Reigate & Banstead Borough, and other planned strategic employment development in the functional economic market area.

### **Delivery**

Planning conditions and obligations to control delivery of the development, the use of the site and appropriate off-site considerations will be required, including for infrastructure, open space and social commitments. These will include:

- Requirement for ongoing economic impacts testing;
- Contribute to delivering objectives of the Crawley Employment and Skills Programme, demonstrating through an Employment and Skills Plan (to be agreed by the council) how the development, through its construction and end user phases, will contribute to addressing the local skills gap. This may include, use of local labour, local supply chain procurement and similar skills/capacity support (in conjunction with local education and training providers).

The development of the site will be in accordance with an agreed master plan, produced by the site promoter in consultation with the council to ensure comprehensive development in line with the above requirements. The master plan will be submitted at the outline planning application stage to assist the consideration of subsequent planning application(s) and must include phasing, programming of infrastructure and details on quantum of development and appropriate uses.

### **Reasoned Justification**

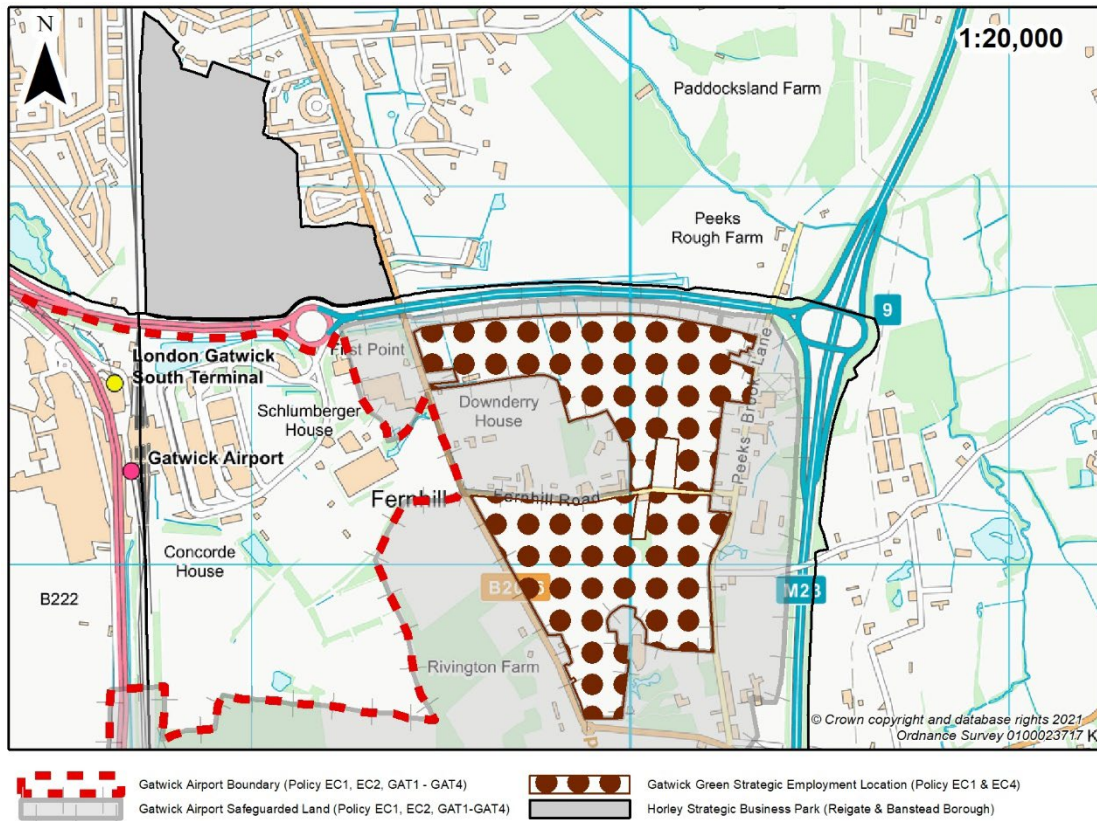
- 9.50 *Local Plan Policy EC1 identifies an overall need for 38.7ha business land over the Plan period, of which the majority (32.8ha) is for industrial land, predominantly B8 storage & distribution warehousing. With an existing industrial land supply pipeline of 8.8ha, there is outstanding need for at least 24.1ha new industrial land in the borough over the period to 2036.*
- 9.51 *The 'call for sites' undertaken for the Local Plan resulted in land totalling just under 140ha being promoted to the council for business-led employment use. These sites, set out within the Employment Land Availability Assessment, are significantly located on land identified in the Gatwick Airport Master Plan for safeguarding.*
- 9.52 *As explained in para.10.17 and set out in Policy GAT 2, land at Gatwick Airport is required to be safeguarded for a potential future southern runway. Most of the sites promoted to the council for employment are located south of the airport, on*

*safeguarded land that would potentially be required to accommodate the physical land-take needed for a southern runway and road diversions. Employment development at these sites would prejudice the future delivery of a southern runway, were this to be required by the Government, and cannot therefore be explored further for allocation, as to do so would be contrary to national policy.*

- 9.53 *Land to the east of Balcombe Road and south of the M23 spur, referred to as Gatwick Green, has also been promoted to the council for employment use through the 'call for sites'. The 47ha site is located east of Gatwick Airport, also on land identified by the Gatwick Airport Master Plan for safeguarding. However, unlike the situation for the other employment sites that have been promoted, land at Gatwick Green does not form part of the land take that would be required to accommodate a southern runway and the diversion of the A23, and is shown in the Gatwick Airport Master Plan as being utilised for a large area of surface car parking. The council does not consider parking to represent an efficient use of the site, particularly given the significant employment needs of Crawley borough, and is of the view that the airport could accommodate parking more efficiently through decked parking and other efficiency measures, should it be demonstrated that additional on-airport parking is required having regard to the airport's surface access obligations stated in the S106 legal agreement. Therefore, the Local Plan retains safeguarding but amends its boundary to exclude land to the east of Balcombe Road and south of the M23 spur, which represents the only site within Crawley that can be allocated for strategic employment growth without prejudicing the possible delivery of a southern runway at Gatwick Airport.*
- 9.54 *Land at east of Balcombe Road and south of the M23 spur, known as Gatwick Green, is allocated for an industrial-led Strategic Employment Location that will provide a minimum of 24.1ha industrial land, predominantly within the B8 use class. The site identified on the Local Plan Map is larger because the significant quantum of industrial floorspace could be supported by complementary uses where justified by evidence, including ancillary uses such as a limited provision of offices and supporting amenity uses that will cater for the needs of employees. Also, there is a need for the strategic development to provide comprehensive supporting infrastructure, appropriate landscaping and to protect the amenity of neighbouring properties. Anticipated to be built out over a seven to ten year period, completed by 2035, the Gatwick Green allocation will meet Crawley's economic needs in the latter part of the Plan period.*
- 9.55 *Crawley's emerging Economic Development Strategy (2020) is clear that diversity is important for the economy's resilience, with greater economic diversity reducing the exposure to financial crisis. Identification of new employment land to address the identified provision gap in the industrial sector, particularly in storage and distribution, will support the shift towards a more diverse and multi-sectoral economy in Crawley. It will add to the type and range of employment sites within the borough. This will help to meet the growth and locational requirements of businesses that have outgrown existing sites, and attract new investment that has not previously been able to locate in the borough due to the scale of their operations and lack of appropriate sites. As such, allocation of Gatwick Green for industrial-led employment will help to reinvigorate Crawley's economy, supporting existing businesses, attracting new and diverse growth, and reinforcing the key economic role of Crawley within the Gatwick Diamond.*
- 9.56 *In doing so, it will be vital to ensure that employment growth at Gatwick Green is delivered in a manner that is complementary to the mixed-business offer of Manor Royal, the vitality and viability of Crawley Town Centre, the office-led Horley Strategic Business Park allocation in Reigate & Banstead Borough, and other planned strategic employment development within the functional economic market area. The*

*applicant will be required to demonstrate in further detail how the required complementarity will be achieved to ensure that Gatwick Green supports economic growth in a manner that does not undermine existing or planned development.*

- 9.57 *Gatwick Green is sustainably located close to Gatwick Airport, though it does represent a countryside location, and it is vital that development is carefully master planned and designed to ensure that the character of its rural setting within the North East Crawley Rural Fringe is not undermined. Issues that will merit particular consideration will include the relationship with the designated Gatwick Wood Biodiversity Opportunity Area and existing properties that border the site, and an appropriate landscape buffer will be required to retain a sense of separation between the site and adjoining countryside and settlements. Regard should be had to presence of ancient woodland, trees and hedgerows, which should be protected and where possible enhanced.*
- 9.58 *The allocated Strategic Employment Location is situated within the Burstow Stream catchment, which is identified as being at a high risk of cumulative flood impacts, whereby multiple development sites, unless carefully planned could result in increased flood risk to third parties. To minimise cross-boundary issues, a detailed local area Flood Risk Assessment and Drainage Study will be required to consider further how the cumulative effects of potential peak rates and volumes of water from development would impact on peak flows, duration of flooding and timing of flood peaks on receiving watercourses. This should detail how SuDS will be incorporated into the development, providing details of adoption, ongoing maintenance and management. This should also outline how the development will seek to provide wider betterment by demonstrating what measures can be put in place to contribute to a reduction in flood risk downstream.*
- 9.59 *The Strategic Employment Location is surrounded by strategic transport links, but it has no immediate access to the strategic road network or Gatwick Airport railway station. A Strategic Employment Location of the scale proposed at Gatwick Green will generate surface access demands that will impact upon the existing highways network. The focus will be to maximise opportunities to access the site by sustainable transport modes, particularly for employees. However, given the scale and industrial nature of the proposed development, development must cater for its operational requirements, particularly HGV movements, demonstrating through the Transport Assessment and Mobility Strategy how this will be achieved without an adverse impact upon the highways network and residential amenity. It is vital that surface access demands arising from the development are appropriately catered for through the delivery of new infrastructure and/or improvements to existing infrastructure as part of the development. The outcomes of the Crawley Local Plan Transport model are at the time of writing being finalised, and will form the basis for more detailed modelling to be undertaken by the site promoter at the planning application stage. Given the requirement to provide the physical infrastructure to support the Strategic Employment Location as part of the development itself, a S106 sustainable transport contribution will not be sought.*
- 9.60 *It should be noted that the requirements set out under Policy EC4 do not represent an exhaustive list, and development at Gatwick Green will be required to have regard to the Local Plan as a whole.*



## Employment and Skills Development

- 9.61 Crawley is a place that is changing and growing, as more people choose to come to the borough to live and work. It is well established as a key employment destination in the Gatwick Diamond, and is home to around 4,000 active businesses which generate over 100,000 jobs. Despite its strong economic performance, there is a recognised disparity between the, on average, lower level of qualifications and income achieved by people that live in Crawley and those of the in-commuting workforce, which are on average higher. This is reflected in Crawley's position close to the bottom of social mobility rankings published in the State of Nation report, where Crawley ranks 304<sup>th</sup> out of 324 local authorities.
- 9.62 Addressing the skills gap is vital to enabling local people to access higher skilled employment, creating the right conditions for career opportunities within the borough. It is important that Crawley offers the right skills profile to cater for the needs of current and future employers. Through the council's own research, it is estimated that £49 million GVA per annum is lost through skills shortages, and working to address the skills gap will help ensure that Crawley continues to attract inward investment as a preferred location for business.
- 9.63 The original Crawley Employment and Skills Plan, launched in 2016, has made a significant impact. Its flagship projects, which include the borough having achieved Construction Industry Training Board (CITB) Skills Academy status, introducing the Developer and Partner Charter and the council's creation of Employ Crawley, are helping to address skills gaps in the local workforce to benefit local people and businesses. In supporting different routes to education and higher value jobs, it has helped to empower some of Crawley's most disadvantaged residents and has promoted and enhanced the council's commitment to making Crawley a Living Wage zone. Through the updated Crawley Employment and Skills Programme 2019-2024 and joint working with stakeholders, the council is continuing its work to enable

Crawley residents to access better quality education and job opportunities within the borough.

- 9.64 However, more needs to be done. One of the challenges facing Crawley is the need to improve education, skills, employment and social mobility outcomes. Crawley's people, location and assets make it an attractive investment and regeneration area, and it is important that the opportunities and proceeds of growth, regeneration and housing can be used to raise aspirations and reduce inequality. The economic implications of the Covid-19 pandemic have added further urgency, and with Crawley among the most exposed authorities in terms of employment, even greater support is needed to help impacted residents to retrain and re-skill.
- 9.65 As Crawley's population grows, the Local Plan has an important role to play in ensuring that development appropriately contributes to improving social mobility in the borough, through supporting access to training and learning for those residents who require assistance, and enabling access to the job market where residents require support.

### Policy EC5: Employment and Skills Development

All major developments will be required to contribute to meeting the objectives of the most up-to-date Crawley Employment and Skills Programme through:

- i. Committing at the Planning Application stage to prepare and submit a site-specific Employment and Skills Plan, the content of which must be agreed by the council prior to the commencement of development. This will detail how the development, through its construction and (for commercial development where there is a known occupier) end user phases, will support initiatives identified in the Crawley Employment and Skills Programme. This commitment will form part of the obligations on a planning permission and will be secured by way of a S106 legal agreement.
- ii. The making of a proportionate financial contribution towards employment and skills initiatives in Crawley.

The requirements of parts i. and ii. above should be satisfied in accordance with the Local Plan Planning Obligations Annex.

### Reasoned Justification

- 9.66 *There is a recognised disparity between the skills levels obtained on average by Crawley residents, and those of the in-commuting workforce. Compared with the South East England (41.4%) average, and also those of neighbouring Horsham District (42.3%) and Mid Sussex District (46.3%), Crawley (33.2%) has a lower proportion of residents with higher-level qualifications (equivalent to NVQ4+). This is also shown in the proportion of Crawley residents (7.6%) who have no formal qualifications, which whilst comparing favourably to the South East England (10.5%) average, is significantly higher than corresponding figures for both Horsham District (3.8%) and Mid Sussex District (4.2%)<sup>77</sup>.*
- 9.67 *Reflecting the skills profile, average weekly earnings for Crawley residents (£558.70) are significantly lower than those for residents living in Horsham (£649.80) and Mid Sussex (£645.40), and remain below the South East England (£614.50) average. The average wage for someone working in Crawley (£632.80) remains higher than the average wage (£558.70) for someone living in the borough, again demonstrating the practical issues arising from the skills gap in Crawley.*

<sup>77</sup> Source: ONS/Lichfields analysis, Northern West Sussex Economic Growth Assessment (2019)



- 9.68 *Crawley is below its neighbours in terms of Gross Value Added (GVA)<sup>78</sup>, a measure of workforce productivity. Average GVA per Crawley worker is £51,300, compared to £57,100 in Horsham District and £52,800 in Mid Sussex. Crawley's GVA per worker is also lower than the average for South East England (£55,707) and that of the UK as a whole (£51,700). Total claimant unemployment has historically compared favourably with the national average but has been gradually increasing in Crawley since the start of the recession in early 2008 (1.3%) to 1.9% in January 2019, and 2.8% in March 2020. However, since the Covid-19 pandemic the Local Universal Credit claimant count has risen sharply to 7.5%, making Crawley the worst affected within the Coast to Capital LEP area and ranking 68<sup>th</sup> highest out of the 380 local authorities in the UK. While the borough's rate compares favourably with the national average (2.4%), it is slightly higher than the South East England region (1.6%), a pattern that has prevailed historically.*
- 9.69 *Therefore, Crawley residents are less likely to access higher-skilled, higher paid jobs. Through the council's Employment and Skills Programme, identifying and creating apprenticeships, training and job opportunities for local residents will continue to be a key objective from which support is sought from developers on major development schemes. A key priority for the council is helping local people and businesses benefit from the opportunities arising from development. This can be supported through the funding of skills, training and employment programmes and local employment and training obligations. Crawley Borough Council is committed to residents, investors, developers and businesses and the council will do all it can to deliver growth, which is inclusive and sustainable for all. The aim is to support local residents, young and old, into employment and raise the skills of the workforce so that they can access the new jobs being created across the borough.*
- 9.70 *As outlined by the Economic Development Strategy (2020), Crawley is classified as the most vulnerable area from Covid-19, having the highest share of employees in the aviation and aircraft manufacturing. Over half of all of Crawley's jobs are at risk of being either furloughed or lost completely and, with the end of the Job Retention Scheme in October 2020, further economic implications are likely to occur. This will increase the need to provide the support and training to enable impacted residents to access new opportunities arising from economic diversification, helping to offset some of the Covid-19 impacts on employment.*
- 9.71 *The NPPF is clear that planning policies should help create the conditions in which businesses can invest, adapt and expand, with significant weight placed on the need to support economic growth and productivity, taking account of local business needs. It goes on to set out that the approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. The Gatwick 360° Strategic Economic Plan<sup>79</sup> identifies pockets of lower skills, specifically referencing Crawley, as a barrier to growth, and establishes the need to create skills for the future as one of its eight economic priorities.*
- 9.72 *Significant forecast job growth in Crawley presents the opportunity to maximise skills development and employment opportunities for local people through securing contributions from development. A better skilled local workforce can provide a pool of talent to both developers and end occupiers. This will also reduce the need to import skills, and in doing so reduce congestion and less sustainable travel to work journeys and reduce carbon emissions. Conversely, an inability to effectively improve local skills levels will maintain the current skills gap, potentially inhibiting economic growth, and failing to address a recognised economic weakness for Crawley.*

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<sup>78</sup> Source: ONS/Lichfields analysis, Northern West Sussex Economic Growth Assessment (2019)

<sup>79</sup> Strategic Economic Plan Gatwick 360° (2018) Coast to Capital Local Enterprise Partnership

- 9.73 *Therefore, Policy EC5 requires all major development, including residential and employment uses, to contribute towards addressing the skills gap in Crawley, helping to support the social mobility of Crawley residents and also meet the requirements of business in providing local access to a more highly skilled workforce. The approach will support appropriate social infrastructure through provision of employment and training initiatives on major development sites at demolition and construction, and for commercial sites where there is a known occupier, the end user phases. This will be demonstrated by way of a site specific Employment and Skills Plan, which should be prepared and submitted by the applicant, in liaison with the council, to demonstrate how the development will support initiatives identified in the Crawley Employment and Skills Programme. This will be secured through a S106 agreement on a planning permission.*
- 9.74 *A developer contribution will also be sought for all major residential and employment applications. This will be used to support Employ Crawley in the borough wide coordination of training and employment schemes supporting local people in gaining access to the job market. Contributions will be agreed by the council and developer and secured through a S106 legal agreement.*
- 9.75 *Further information on the preparation, content and outcomes required from part i, the Employment and Skills Plan, is set out in the Employment and Skills Provision Guidance Note<sup>80</sup>. The Planning Obligations Annex sets out detailed guidance on the requirements of Strategic Policy EC5, part ii. relating to the calculation and payment of a developer contribution towards employment and skills development. Both parts of Policy EC5 should be satisfied in accordance with the Planning Obligations Annex.*

### **High Quality Office Provision**

- 9.76 Crawley is the Gatwick Diamond sub-region's largest and most dominant office centre, and the market has increasingly gravitated to Crawley in order to benefit from its accessible location. Across the Northern West Sussex Functional Economic Market Area, the office market has been characterised recently by more challenging conditions, with lower levels of take-up. This is in part a result of the available supply, which is largely composed of older Grade B office stock that does not match the market demand which is for new Grade A stock, often bespoke rather than speculative, across a range of sizes. This has resulted in the Crawley office market being somewhat suppressed, with the limited available Grade A stock quickly taken up, and lower grade stock tending to remain vacant. This is very much a qualitative issue for Crawley's office stock, and there is a growth opportunity for Crawley if the quality and configuration of office space being sought can be provided.
- 9.77 The Local Plan identifies designated Main Employment Areas, which are protected and promoted as the focus for sustainable economic growth. These are long-established employment destinations which make a significant contribution to the economy of Crawley, and also to that of the wider sub-region. The NPPF<sup>81</sup> identifies offices as a main town centre use, requiring that these should in the first instance be directed to Town Centre locations in line with the sequential approach, before edge-of-centre or out-of-centre locations can be considered. Whilst the Town Centre remains an important employment destination, including for office uses, it is important that sustainable economic growth is supported within the Main Employment Areas. For this reason, office development will be exempt from the requirements of the NPPF sequential test where located within the designated Main Employment Areas, or at appropriate locations that are within 500 metres of a public transport interchange.

<sup>80</sup> <https://investcrawley.co.uk/employment-and-skills/employments-and-skills-programme>

<sup>81</sup> National Planning Policy Framework, Glossary, page 68 (2019) MHCLG

## Policy EC6: High Quality Office Provision

Development that adds to the supply and variety of high quality Grade A office space in Crawley, including the refurbishment and improvement of existing office floorspace and the provision of new office floorspace, will be supported in the Main Employment Areas.

The sequential test will not be required where new Grade A office floorspace is proposed within the Main Employment Areas, or where it is located within 500 metres of a public transport interchange.

Within the Gatwick Airport boundary, non-airport related office development should meet the requirements of Policy GAT4.

### **Reasoned Justification**

- 9.78 *Through the EGA, engagement with local property agents identifies that ‘pent up’ demand exists in the current market for new, high quality office stock across the full size and spectrum, with limited to no demand for the lower quality ‘Grade B’ space. This reflects the shifting focus amongst office occupiers, with most office activity and churn involving a move into upgraded accommodation. However, the available portfolio of office space across Northern West Sussex, including Crawley, does not fully match this requirement, and in the absence of any significant quantum of new Grade A office accommodation, much of this demand cannot be satisfied by the existing stock on offer.*
- 9.79 *Analysis presented within the emerging Coast to Capital Local Industrial Strategy evidence shows that recent office take up (2013-2018) across the Local Enterprise Partnership area has been for mid-to-lower quality office stock, driven by a lack of higher quality stock. For the same area, there have been fewer 4-5 star office transactions than in more productive competitor areas. With Crawley providing little by way of new high quality office space, and the available lower grade space not meeting market demands, Crawley’s office market has in recent years been characterised by an over-supply of lower grade office provision. Therefore, the issue for Crawley is very much a qualitative one, and moving forward, the EGA recognises the lack of quality office stock as a key challenge facing the Northern West Sussex Functional Economic Market Area.*
- 9.80 *The NPPF is clear that planning policies should create the conditions in which businesses can invest, adapt and expand, taking account of local business needs, and seeking to build on existing strengths, counter any weaknesses, and address the challenges of the future<sup>82</sup>. The EGA identifies that the Northern West Sussex office market is being suppressed by an insufficient supply of high quality new stock, and recognises that Crawley, as the main driver of the sub-region market, has an opportunity to support economic growth in the functional economic market area through making a ‘step-change’ intervention that supports delivery of the type and configuration of office provision sought by the market. Therefore, Policy EC6 supports, within the designated Main Employment Areas, the upgrade of existing offices and the delivery of new high quality office stock.*
- 9.81 *Recognising the established role of Crawley’s Main Employment Areas as a focus for sustainable economic growth, and the significant role of these locations in promoting local and sub-regional economic growth, the Local Plan is positive in supporting economic development within the Main Employment Areas. The NPPF identifies offices as a Main Town Centre use, requiring through the sequential test that office development should in the first instance be located in the Town Centre, before edge-*

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<sup>82</sup> National Planning Policy Framework, paragraph 80 (2019) MHCLG

*of-centre or out-of-centre sites can be considered. Whilst office development is supported within Crawley Town Centre, the national policy does not take account of the specific local circumstances in Crawley, specifically that the town has dedicated Main Employment Areas, including Manor Royal, which is the largest business location in the Gatwick Diamond.*

- 9.82 *Therefore, to support economic growth in Crawley, and to help create conditions in which business can invest, where office development is proposed in the Main Employment Areas, it will not be necessary for applicants to demonstrate that the sequential test<sup>83</sup> is satisfied. For office development, the NPPF defines 'edge-of-centre' as including 'locations outside the town centre but within 500 metres of a public transport interchange'<sup>84</sup>. To support economic growth in Crawley, where office development is proposed within 500 metres of a public transport interchange, it will also not be necessary for applicants to demonstrate that the sequential test is satisfied.*
- 9.83 *Office development at Gatwick Airport is specifically considered under Local Plan Policy GAT4 (Employment Uses at Gatwick).*

### **Visitor Accommodation**

- 9.84 Crawley is home to a number of hotels and other forms of visitor accommodation. These are located throughout the borough, but are particularly concentrated in the Town Centre and at Gatwick Airport. Hotels are identified by the NPPF as a main town centre use, and should be located in the town centre in the first instance. However, it is recognised that in Crawley hotels serve a particular airport-related need for passengers, air crew and other airport users, and therefore Gatwick Airport is also a sustainable location for hotels.
- 9.85 Hotels can also provide supporting facilities for Manor Royal, but it will also be necessary to demonstrate that the development will support the business function of Manor Royal, particularly given the evidenced business land supply constraints in Crawley and the need to maximise the use of the Main Employment Areas for business-led economic growth.
- 9.86 Local Plan Policy GAT3 outlines that the provision of airport-related parking will only be permitted within the Gatwick Airport boundary and must be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport. This applies to the provision of airport-related vehicle parking at hotels.

### **Policy EC7: Hotel and Visitor Accommodation**

Hotel and visitor accommodation will be supported where it meets the specific locational requirements set out below.

Where hotel and visitor accommodation is proposed outside of the Town Centre or Gatwick Airport, it will be necessary to demonstrate, through the use of the sequential test, that no sequentially preferable sites are available.

Where hotel and visitor accommodation is proposed within the Gatwick Airport boundary, it will be necessary to demonstrate that the development will not have a detrimental impact on the long-term ability of the airport to meet its operational land and floorspace requirements as it grows. Car parking related to on-airport hotel development must meet the requirements of Policy GAT3.

<sup>83</sup> National Planning Policy Framework, paragraph 86 (2019) MHCLG

<sup>84</sup> National Planning Policy Framework, Glossary, page 66 (2019) MHCLG

Where hotel and visitor accommodation is proposed in Manor Royal it will be necessary to demonstrate that the development will cater specifically for the business needs of Manor Royal, including through the provision of business support facilities and staff amenities as per the requirements of Local Plan Policy EC3 (Manor Royal).

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

### **Reasoned Justification**

- 9.87 *Hotels represent a main town centre use, and support Town Centre vitality and viability. The Town Centre is the preferred location for hotel and visitor accommodation, as it is here where linkages with shops, restaurants and other main town centre uses can best be facilitated. Gatwick Airport is also a sustainable location for hotels given the demand it generates, and whilst hotels do not represent an operational use (paragraph 10.15 refers), they are supported at the airport provided current and future operational needs are not compromised. Where hotel and visitor accommodation is proposed outside of the Town Centre or Gatwick Airport, it will be necessary to demonstrate that the requirements of the NPPF sequential test are satisfied.*
- 9.88 *Where hotel and visitor accommodation is proposed in Manor Royal, applicants will be required to demonstrate how the development will provide business facilities and amenities for Manor Royal staff to ensure that the development supports the principal business function of Manor Royal. Given the recognised absence of a dedicated business hub at Manor Royal, there is scope for a hotel development, if carefully planned to incorporate an appropriate range of business-supporting facilities, to provide the business hub function that is currently lacking. To steer the type of business supporting facilities that may help to achieve this, applicants should refer to Local Plan Policy EC3 and its supporting text. The onus will be on the applicant to incorporate the necessary features into their scheme that would clearly demonstrate the complementary nature of the proposal to Manor Royal. Applicants are also encouraged to liaise with the council and Manor Royal BID at an early stage to scope the type of facilities needed to enable any hotel proposal to appropriately support the Manor Royal business function.*
- 9.89 *Airport parking should be located within the airport boundary and, therefore, Policy EC7 contains the appropriate text to ensure consistency with the approach of Local Plan Policy GAT3.*

### **Evening and Night-Time Economy**

- 9.90 The evening and night-time economy refers to those commercial activities that operate into the evening and night, at a time when retail and other daytime uses typically cease. It can include arts, culture and entertainment uses (such as cinemas, theatres, restaurants, bars and nightclubs) that can appeal to a wide cross-section of the population and a variety of age groups.
- 9.91 In Crawley, the evening and night-time economy is focused in the Town Centre, particularly around the historic High Street, and also at neighbourhood centres and in some cases Manor Royal. When managed correctly, a successful evening and night-time economy becomes part of a town's character and atmosphere, extending vitality beyond regular working hours, creating jobs, and particularly for the Town Centre, increasing its attractiveness as a place to live and visit. However, where evening and night-time uses are inappropriately located or poorly managed, this can create or exacerbate negative impacts including nuisance, noise, odour, crime and anti-social



behaviour. Therefore, it is important that evening and night-time uses are carefully planned so that they are complementary to, rather than conflict with, other uses.

### **Policy EC8: Evening and Night-Time Economy**

Development that adds to the vitality and viability of Crawley's evening and night-time economy will be supported, subject to demonstrating that:

- a) the design of development and management arrangements are appropriate in relation to public safety, crime prevention and the reduction of anti-social behaviour where relevant;
- b) there will be no significant individual or cumulative negative impact on the surrounding character of the area and residential amenity;
- c) arrangements for mitigating pollution including odour and noise, are provided in a way that minimises visual and environmental impact;
- d) the proposed evening or night-time use will not result in blank or inactive frontages onto the public realm during daytime hours.

Flexible or late-night opening hours will be a material consideration in favour of such development, where appropriate to the use proposed and subject to relevant amenity considerations. Development will not be permitted where it would create or exacerbate existing problems when considered against the criteria set out above. In all cases, the NPPF 'agent of change' principle will form a material consideration.

#### **Reasoned Justification**

- 9.92 *A successful evening and night-time economy can add vibrancy and vitality to a location, helping to generate activity whilst meeting local needs. In order to avoid conflict with existing amenity sensitive uses, proposals for evening and night-time economy uses should be sited in appropriate locations, and carefully planned to take account of cumulative impact on the character and function of the town, crime and local amenity.*
- 9.93 *Crawley Town Centre, and particularly the historic High Street, represents an established focus for evening and night-time uses. Evening and night-time uses that add to the vibrancy of the Town Centre, can help attract visitors to the Town Centre and also support the needs of its growing residential population. However, there is a need to ensure that such uses are carefully planned, having regard to the 'agent of change' principle, to avoid conflict with existing residential uses. There is also a need to ensure that where uses are proposed that would operate predominantly during the evening, this would not result in blank facades or frontages that fail to engage with the public realm and street scene during daytime hours.*
- 9.94 *Crawley's neighbourhood parades are situated in residential areas, and any evening or night-time economy uses in these locations will need to be carefully managed to ensure that there is not a negative amenity impact on nearby residential uses, nor on the function of the neighbourhood centre itself.*
- 9.95 *Manor Royal is a 24-hour main employment area, with a number of commercial and business uses that operate through the night. It is recognised that some evening and night-time uses, subject to their scale and function, may be appropriate to support the principal business function of Manor Royal and to meet the needs of people working in Manor Royal, particularly those working night shifts. Where evening and night-time economy uses are proposed in Manor Royal, particular regard should be had to the requirements of Local Plan Policy EC3.*

#### **Supporting the Creative Industries**

- 9.96 The creative industries sector, which makes up over five per cent of the UK economy and employs more than two million people, is one of the fastest growing, contributing

£87bn of GVA<sup>85</sup> in 2017. Through its Gatwick 360° Strategic Economic Plan, the Coast to Capital Local Enterprise Partnership identifies the creative industries sector as a key competitive advantage for the area, outlining that highly innovative micro, small and medium-sized businesses are now increasing in number, not just in the traditional creative hubs of Brighton and Croydon, also in the towns surrounding Gatwick Airport. The LEP objective is to create the economic conditions for innovation to continue to flourish.

### **Policy EC9: Supporting the Creative Industries**

Within the Main Employment Areas the provision of new or improved business floorspace for use by the creative industries will be supported where:

- a) it would enhance the supply and range of employment floorspace, including start-up, incubation, and growth space, in the borough;
- b) it would not result in a significant individual or cumulative negative impact on the operation of the Main Employment Area;
- c) it makes provision for gigabit-capable full fibre broadband to ensure that fibre or other cabling does not need to be retrofitted;
- d) the proposed use, if falling within the definition of 'Main Town Centre' uses, satisfies the NPPF sequential and impact tests where these apply.

#### **Reasoned Justification**

- 9.97 *Work undertaken by the Arts Council through its Active Lives survey shows that Crawley performs lower in terms of participation in the arts and creative sectors compared to neighbouring areas, with the borough falling within the bottom 33% nationally and being the only West Sussex authority ranked this low.*
- 9.98 *The Crawley 2030 Local Plan applied a flexible approach to support sustainable economic growth in Crawley, though it was not explicit in its support for the creative industries. Policy EC9 seeks to positively support the creative industries through the planning system. The creative industries sector captures a broad range of typologies, including Advertising & Marketing; Architecture; Arts & Crafts, Culture & Exhibitions; Markets and Food & Drink Sales; Design (including digital, product, graphic and fashion design); Film, TV, video, radio and photography; IT Software and Computer services; Publishing; Museums, Galleries and Libraries; Music, Performing and Visual Arts; Arts/Crafts workplaces and studios.*
- 9.99 *Many of the creative uses listed above fall within the business use sectors, and where this is the case, proposals will be supported in the Main Employment Areas. However, it is recognised that other uses will fall outside of the business sectors and within the Commercial, Business and Service E-Class, for example food and drink stalls or cultural uses. Where this is the case, development should be directed to the Town Centre in the first instance, and the NPPF sequential and (where required) impact tests will need to be satisfied where development of this nature is proposed at edge-of-centre or out-of-centre locations. The Hawth Theatre Main Employment Area represents a particular focus for arts, culture, performance and exhibitions.*
- 9.100 *Gatwick 360° identifies the need to support the creative industry sector through the provision of essential technology, including the roll out of 5G connectivity to key locations including Gatwick Airport. To support this objective, it is important that new development takes the opportunity to incorporate provision for gigabit-capable full fibre broadband to ensure that fibre or other cabling does not need to be retrofitted.*

<sup>85</sup> UK Industrial Strategy: Building a Britain Fit for the Future (2017)

## Flexible Temporary Cultural and Creative Uses

9.101 Where sites and buildings have been long-term vacant, particularly where these are vacant before planning permission is implemented, it is recognised that certain uses within the cultural and creative industries sector, may be appropriate on a temporary basis. Such temporary uses can help stimulate activity and vibrancy, making efficient use of sites that would otherwise remain unused. Equally, in enabling vacant units to be taken up on a temporary basis by businesses seeking to test new business concepts, pop-up stores and event spaces, the approach can generate interest and footfall whilst providing confidence for new and existing small and medium-sized enterprises (SMEs) investing in Crawley.

### Policy EC10: Flexible Temporary Cultural and Creative Uses

Within the Main Employment Areas and neighbourhood centres, the growth and evolution of Crawley's cultural facilities and creative industries will be supported through the temporary 'meanwhile' use of vacant commercial premises and public realm, provided that the proposed temporary use:

- a. would generate footfall and stimulate activity, including through the provision of active and engaging frontage where appropriate;
- b. would be appropriate to its location in terms of amenity and disturbance, having regard to the agent of change principle;
- c. would be sustainably located close to public transport links;
- d. where proposed on land or buildings that are subject to a Local Plan allocation or planning permission, would not prejudice the timely implementation of that site;
- e. would not result in an adverse impact on the economic function of the Main Employment Area.

### Reasoned Justification

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

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

### Employment Development and Residential Amenity

9.104 It is important that the relationship between employment and amenity sensitive uses, such as residential uses, is carefully managed in order to minimise the scope for conflict. Given Crawley's limited available land supply, it is vital that the employment function of the designated Main Employment Areas is not undermined by the inappropriate introduction of new residential or other amenity-sensitive uses. Equally, it is important that the amenity of existing residential or other sensitive uses is not

compromised by new employment development that would result in nuisance to existing occupiers. This scope for conflict can be reduced through applying the 'agent of change' principle, this being the position that development that would introduce a new land use (whether this is a noise sensitive use or a noise generating use), is responsible for managing the impact of that change.

### **Policy EC11: Employment Development and Residential Amenity**

The relationship between employment and amenity sensitive uses, particularly residential, must be carefully planned, having regard to the 'agent of change' principle, to minimise the scope for nuisance.

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

Proposals for the development, redevelopment or change of use of sites for employment use within or adjacent to residential areas will be permitted where there is no adverse harm to the amenity, function and setting of nearby residential uses.

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

#### **Reasoned Justification**

- 9.105 *The Main Employment Areas are designated to support economic growth in Crawley, with Manor Royal protected for business and business supporting uses, with a more flexible range of employment generating uses supported in the other Main Employment Areas. The role of the Main Employment Areas is to protect them for employment use in order to help meet the economic land and floorspace needs identified in Policy EC1, and to ensure that the economic function (as existing or in the future) of these areas is not unduly constrained by the inappropriate introduction of amenity-sensitive uses.*
- 9.106 *Some types of economic development may result in issues of noise or other forms of disturbance, which if located close to existing amenity-sensitive uses, could result in nuisance to occupiers. The Main Employment Areas are designated to support economic growth, though it is recognised that some Main Employment Areas are situated in close proximity to existing residential or amenity-sensitive uses, and in these cases it will be necessary for development to ensure that the amenity of local residents has been fully addressed and mitigated.*
- 9.107 *This is most notably the case at the south-east and south-west of Manor Royal, and the employment land at Forge Wood, where there is little separation between nearby residential development and the Main Employment Area. Recognising the scope for conflict in these areas, Buffer Zones have been identified in Manor Royal at Tinsley Lane and Tushmore Lane, and at the Forge Wood employment land, as identified on the Local Plan Map. Within these areas, particular care should be taken to ensure that economic development proposals do not adversely impact upon the amenity and setting of nearby residential uses.*
- 9.108 *Equally, it is recognised that the Main Employment Areas represent the key focus for economic development in Crawley, and the economic function of these areas should not be constrained by inappropriate new residential or other amenity-sensitive*

*development. This reflects the NPPF, which is clear that ‘existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established’<sup>86</sup>. This is expanded upon by PPG: Noise, which recognises that new development may represent an ‘agent of change’, and is clear that regard should be had ‘not only the current activities that may cause a nuisance, but also those activities that businesses or other facilities are permitted to carry out, even if they are not occurring at the time of the application being made’<sup>87</sup>. To promote the continued functionality of Main Employment Areas, where residential development is proposed within or adjacent to Main Employment Areas, regard will be had to the potential impact on the operation of existing economic uses, as well as future employment uses, to ensure that the economic function of the Main Employment Area is not undermined.*

## **Neighbourhood Centres**

9.109 As a New Town, Crawley has been built on the neighbourhood principle, with each neighbourhood centre providing its own local shops in a dedicated neighbourhood parade, as well as facilities and services such as community centres, public houses and local level employment to support the day-to-day needs of residents. Although shopping habits have changed over time, the neighbourhood parades remain an important part of Crawley’s make-up; representing a key aspect of Crawley’s character, serving as sustainable locations for local retail and employment and acting as hubs for day-to-day community life.

### **Policy EC12: Neighbourhood Centres**

Crawley’s neighbourhood centres provide floorspace that contributes to the town’s wider employment function. These areas continue to be recognised as sustainable locations for smaller-scale employment use, and economic development will be supported where it meets the policy requirements of Local Plan Policies CL1, CL2, DD1, EC1 and EC11.

In neighbourhood parades, new floorspace and ground floor changes of use will be supported provided that proposals:

- i) are appropriate to the established role of the neighbourhood centre in terms of scale and function; and
- ii) will not adversely affect the ability of the parade to cater for the day-to-day needs of local residents; and
- iii) will not result in an adverse impact upon the amenity and environment of the locality; and
- iv) will maintain and where possible enhance the vitality and viability of the parade.

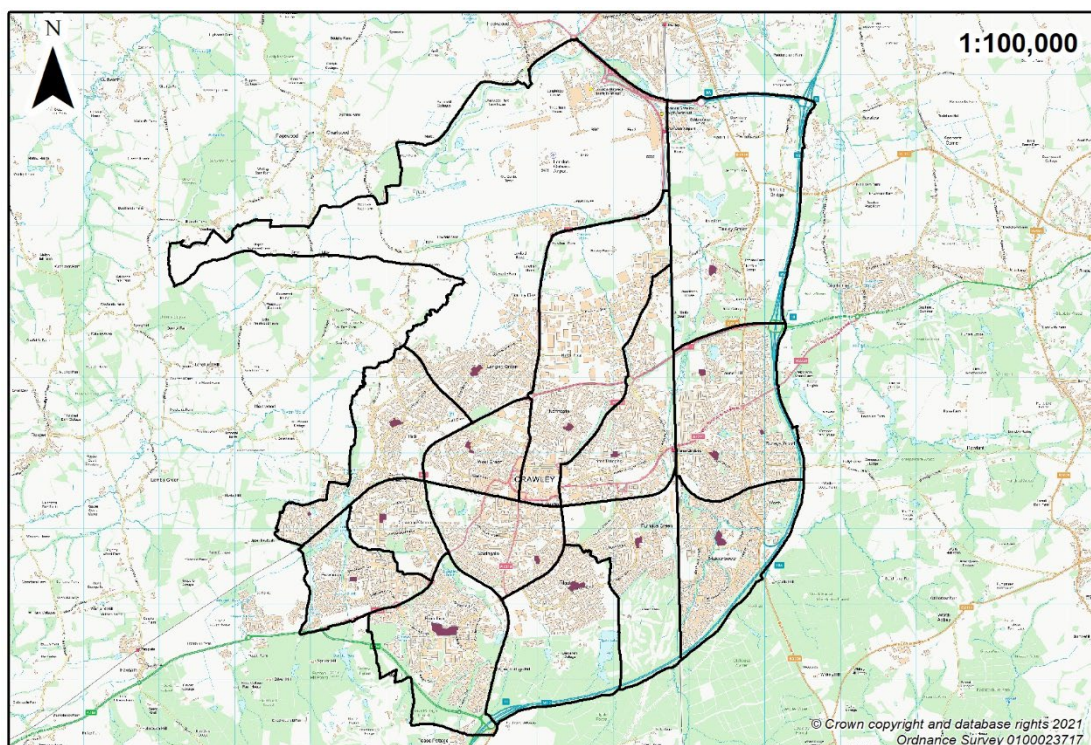
### **Reasoned Justification**

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

<sup>86</sup> National Planning Policy Framework, paragraph 182 (2019) MHCLG

<sup>87</sup> Planning Practice Guidance: Noise, paragraph 009 Reference ID: 30-009-20190722 (2019) MHCLG





Neighbourhood Parades (Policy EC12)

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

### Rural Economy

9.112 Crawley is a predominantly urban borough, though the countryside beyond its Built-up Area Boundary contains some agricultural, commercial and recreational enterprises. The NPPF<sup>88</sup> recognises that these rural businesses should be allowed to grow where this can be achieved in a manner that is sustainable and appropriate to the countryside setting. Therefore, it is vital to ensure that these needs are balanced against the overall strategy to protect the intrinsic value and beauty of the countryside, and avoid inappropriate development that would have an urbanising effect.

### Policy EC13: Rural Economy

Beyond the Built-Up Area Boundary, development that enhances Crawley's rural economy will be supported provided it:

- a) is of a scale and function that is appropriate to, and consistent with, the character of the countryside; and

<sup>88</sup> National Planning Policy Framework, paragraphs 83-84 (2019) MHCLG

- b) would not result in an urbanising impact that would undermine the intrinsic character and beauty of the countryside; and
- c) would not result in the loss of valued landscapes, sites of biodiversity or geological value, trees and woodland, or the best and most versatile agricultural land; and
- d) would not result in the loss of connectivity or function of the green infrastructure network and/or sites of biodiversity value.

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

Any development must also meet the requirements of Policy CL8: Development Outside the Built-Up Area.

### **Reasoned Justification**

9.113 *The NPPF supports the sustainable growth and expansion of businesses in rural areas, but is clear that this should be achieved in a manner that respects the character of the countryside. The NPPF requires planning policies and decisions to contribute to and enhance the natural environment, including through protecting and enhancing valued landscapes, recognising the intrinsic character and beauty of the countryside, and preventing new development from contributing to unacceptable levels of pollution<sup>89</sup>. The NPPF is clear that planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation<sup>90</sup>.*

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<sup>89</sup> National Planning Policy Framework, paragraph 170 (2019) MHCLG

<sup>90</sup> National Planning Policy Framework, paragraph 180 (c) (2019) MHCLG

## Gatwick Airport

- 10.1 Gatwick Airport lies within the borough of Crawley and at peak times, prior to the Covid-19 pandemic, was the busiest single runway airport in the world. In 2018/19, Gatwick Airport handled 46.4million passengers. The presence and operation of an international airport within the borough generates specific planning issues which need to be addressed by local planning policies. The Airport generates a significant number of economic benefits both directly through its own employment requirements but also, indirectly, through the wider benefits to the regional and local economy which make Crawley and the wider Gatwick Diamond area attractive to employers and businesses. However, it also creates significant environmental impacts particularly as a result of air traffic movements and surface access to the airport. The airport operator and the councils around the airport work together to seek to reduce any significant adverse effects.
- 10.2 The council is consulted on any developments which the airport operator proposes to undertake under its 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. Development required to support the growth in capacity of the airport over 10mppa, for example through the routine use of the northern standby runway, would be considered as a Nationally Significant Infrastructure Project under the Planning Act 2008, and as such would be determined by the Secretary of State for Transport, advised by the Planning Inspectorate through the Development Consent Order process.

### Chapter Content

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

### The Key Issues

- 10.4 There are a number of key evidence based documents which need to be taken into account including the national policy background in terms of airport growth and runway issues.
- 10.5 The main evidence based documents are:
- Aviation Policy Framework (DfT, March 2013)
  - Aviation 2050; The Future of UK Aviation Consultation (DfT, December 2018)
  - Beyond the Horizon; The Future of Aviation; Making Best Use of Existing Runways (DfT, June 2018)
  - Airports National Policy Statement: New runway capacity and infrastructure at airports in the South East of England (DfT June 2018)
  - Gatwick Airport Master Plan (Gatwick Airport Limited, July 2019)
  - Gatwick Airport Surface Access Strategy (Gatwick Airport Limited, May 2018)
  - Gatwick Airport Interim Parking Strategy (Gatwick Airport Limited, February 2017)
  - April 2019 Legal Agreement between CBC, WSCC and the airport operator
- 10.6 The National Aviation Policy Framework, 2013, makes it clear in para. 5.9 that “*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*”. Following the work of the Airports Commission to examine the scale and timing of any requirement for additional runway capacity in the south east,

the government set out its preferred option for a new Northwest runway at Heathrow in the “Airports National Policy Statement, (ANPS): new runway capacity and infrastructure at airports in the South East of England”, adopted in June 2018. The ANPS was challenged through the Courts but the Supreme Court in December 2020 concluded it was lawful. The ANPS also references the Airports Commission’s findings on the need for more intensive use of existing infrastructure at other airports. In its document, “Beyond the Horizon: The Future of UK Aviation: Making best use of existing runways”, June 2018, the government recognises that the DfT’s latest aviation forecasts (2017) reflect accelerated growth at London’s main airports. This is putting pressure on existing infrastructure, despite significant financial investments by airports over the past decade. “Beyond the Horizon”, therefore, sets out the government’s support of airports beyond Heathrow making best use of their existing runways, provided that all relevant considerations, particularly economic and environmental impacts and proposed mitigations are addressed.

- 10.7 The government published its draft Aviation Strategy, “Aviation 2050; The Future of UK Aviation” in December 2018 although this has not yet been progressed further. The draft document aims to achieve a safe, secure and sustainable aviation sector that meets the needs of consumers and a global, outward-looking Britain. It supports the growth of aviation and the benefits this would deliver, provided that growth takes place in a sustainable way, with actions to mitigate the environmental impacts. The draft document states that the government believes forecasted aviation demand up to 2030 can be met through expansion at Heathrow and other airports making best use of their existing runways subject to environmental issues being addressed. It notes that the Airports Commission recognised that whilst there may be a demand case beyond 2030, there is not necessarily a corresponding environmental or commercial case and that the government is not at the point of making a decision on long term need. The document states that the government 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 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 suggests the government’s preferred approach is to set criteria but not name specific airports, and to let the industry decide whether and when to bring forward applications.
- 10.8 With regard to the safeguarding of land for airport growth, however, the draft document does state in para. 3.66 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”. It refers to the NPPF which restates the government’s commitment to “identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice” and that the government believes this provides sufficient guidance for local authorities to consider the future needs of airports and their surface access requirements when developing local plans. The NPPF 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. Whilst NSIPs are subject to a separate planning process within the national planning regime, the policies set out within the Local Plan will inform any Local Impact Report submitted by the council to the Secretary of State in connection with the determination of an NSIP.



- 10.9 An existing S106 Agreement signed between Gatwick Airport, WSCC and CBC in April 2019 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.
- 10.10 The Gatwick Airport Master Plan (July 2019) anticipates capacity on its single runway could increase to between 58 and 61 million passengers per annum by 2032/33. The Gatwick Airport Master Plan also sets out two further scenarios for growth of the airport, through operational use of the existing standby runway and through continuing to safeguard land for an additional runway to the south of the airport. The Master Plan states that Gatwick is no longer actively pursuing plans for an additional runway, but that there nevertheless remains the possibility that the airport may wish to build and operate one in the future. The document states that it is in the national interest to continue with the strategy of land safeguarding.
- 10.11 The Covid-19 pandemic has had a very significant impact on airport operations, with a substantial reduction in flight and passenger numbers continuing at the current time. However, it is anticipated that passenger numbers will gradually return to pre-Covid levels in the next few years and will continue to grow over the Plan period, albeit perhaps at a slower rate in line with wider economic recovery.

## Local Plan Policies

### Development of the Airport

- 10.12 Prior to the Covid-19 pandemic, annual passenger numbers at Gatwick Airport were increasing each year, reaching 46.4million in 2018/19. This is due to a combination of more use of the airport in off-peak periods, larger aircraft and greater load factors, and more intensive use of the runway. The Gatwick Airport Master Plan (July 2019) anticipates these factors, which are significantly able to take place outside the control of the planning system, could increase capacity on its single runway to 53million passengers per annum (mppa) by 2023, and 61mppa by 2032 due to advances in air traffic management technology. The Master Plan also sets out two further scenarios for growth of the airport, through use of the existing standby runway which could increase capacity to 70mppa by 2032, and through continuing to safeguard land for an additional runway to the south of the airport which could increase capacity to around 95mppa within 20 or 25 years from opening the additional runway.

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

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

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



The control or mitigation of impacts, compensation, infrastructure and benefits will be secured through appropriate planning conditions and/or S106 obligations.

Where development to enable sustainable growth at Gatwick Airport will be a Nationally Significant Infrastructure Project, such as the use of the northern runway, i-iv above will be expected to be met by the airport operator and secured through appropriate requirements or S106 obligations.

### **Reasoned Justification**

- 10.13 *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 permitted development rights for new facilities to support rising passenger numbers. Measures are in place, through the S106 Agreement between CBC, WSCC and Gatwick Airport to mitigate some of the adverse impacts of airport growth, and where planning permission is required for new development at the airport, the council will need to ensure that it contributes to the safe and efficient operation of the airport and that its impacts are minimised or mitigated as required, sufficient supporting infrastructure can be put in place, and local benefits are maximised. The council will also consider the cumulative impact of numerous small developments. Planning conditions and further S106 obligations will be sought.*
- 10.14 *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. Applications for such developments would, therefore, be determined by the Secretary of State through the Development Consent Order (DCO) process. The Gatwick Airport Master Plan 2019 proposal to use the standby runway would increase capacity by over 10mppa and will therefore be determined through a DCO process. Gatwick Airport has formally commenced this process, publishing its Scoping Report in September 2019. Submission of the DCO has been delayed but is still currently anticipated in 2021 with, should it be approved, operational use starting in 2026. Maximum capacity would be reached in 2038. The council would expect the environmental impacts to be minimised, or mitigated, infrastructure to be provided and related benefits to the local area to be maximised, and is working with neighbouring authorities to ensure these objectives are achieved across the wider area.*
- 10.15 *Proposals that contribute to the safe, secure and efficient operation of the airport are considered to include operational uses such as terminals, runway facilities, aircraft maintenance, freight handling facilities; directly related development including transport interchanges, admin offices and parking; as well as less directly related development (e.g. hotels, conference and leisure facilities, offices and retail) where the relationship to the airport is explicitly justified and is of an appropriate scale relative to airport activities. In all cases, proposals should have regard to the NPPF requirements for promoting public safety through anticipating and addressing possible malicious threats, including through proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security<sup>91</sup>.*

### **Future Runway Development and Need for Safeguarding**

- 10.16 The Aviation Policy Framework (March 2013) outlines that 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

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<sup>91</sup> National Planning Policy Framework, paragraph 95 (2019) MHCLG

any relevant policies and proposals in response to the findings of the Airport Commission.

- 10.17 The government established its policy and proposals in response to the findings of the Airports Commission when it published the ANPS in June 2018, supporting a third runway at Heathrow. The 'Making the Best Use of Existing Runways' government policy statement, also published in June 2018, also referred to the Heathrow decision and provided policy relating to all other airports, supporting the expansion of capacity on their existing runways. However, the draft national Aviation Strategy, Aviation 2050, which was published in December 2018, after the ANPS was published, as detailed in para. 10.8 above, states that it would be prudent to retain safeguarding policies at other airports. There is not, therefore, any certainty in government policy that land at Gatwick is no longer required to be safeguarded. This means that it is considered land at Gatwick is still required to be safeguarded for a potential future runway, as the Local Plan must be consistent with national policy. Paragraph 1.33 confirms that a review of the Local Plan will be triggered should certainty be gained over national aviation policy on safeguarding.

### Policy GAT2: Safeguarded Land

#### **Safeguarding for a second runway**

The Local Plan Map identifies land that is safeguarded from development which would be incompatible with expansion of the airport to accommodate the construction of an additional wide spaced runway (if required by national policy) together with a commensurate increase in facilities that contribute to the safe and efficient operation of the expanded airport.

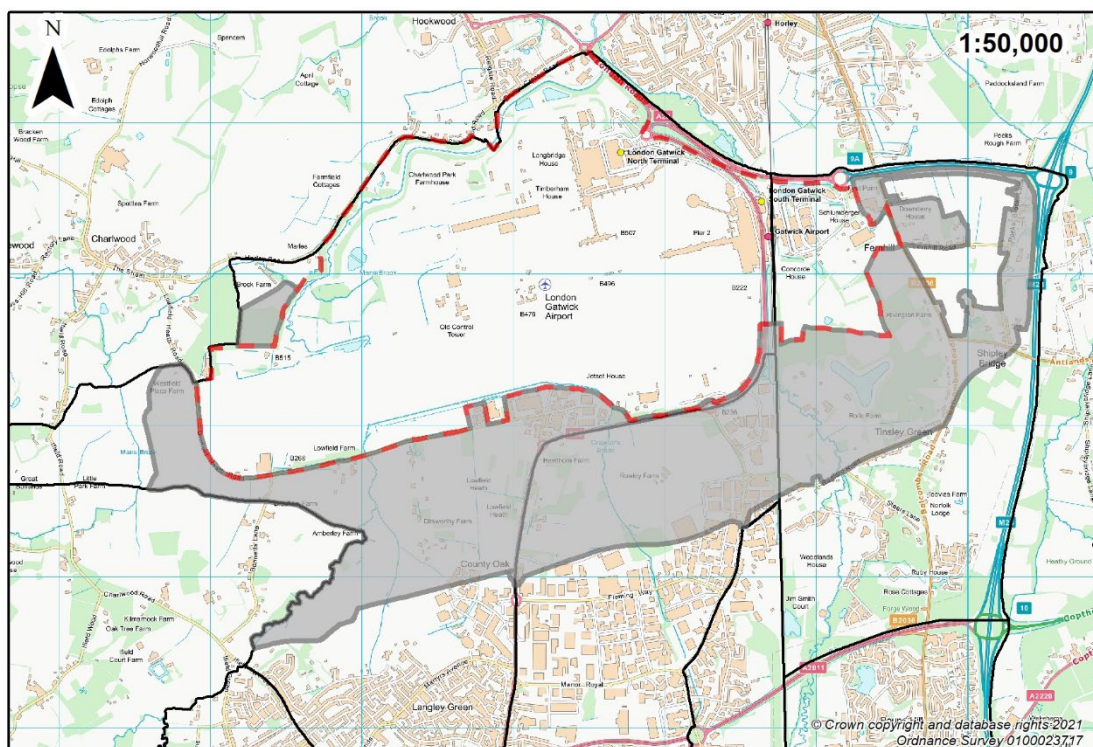
Small scale development within this area, such as residential extensions, will normally be acceptable. The airport operator will be consulted on all planning applications within the safeguarded area.

Planning applications for noise sensitive development will be considered on the basis of Air Noise Map – Additional Runway – Summer Day – 2040 as shown at Plan 31 of the Gatwick Airport Master Plan and in the Local Plan Noise Annex.

#### **Reasoned Justification**

- 10.18 *The original requirement to safeguard land for a second runway at Gatwick was contained in the 2003 Aviation White Paper. The Aviation Policy Framework (March 2013) clarified the position, and the draft Aviation Strategy, published after the ANPS, also refers to the need for safeguarding, as set out above. If national aviation policy on safeguarding provides certainty that safeguarding is no longer required at Gatwick, then a Local Plan Review will take place in order to assess the appropriate uses for the currently safeguarded area (para. 1.33).*
- 10.19 *Incompatible development within safeguarded land is regarded as development which would add constraints or increase the costs or complexity of the development or operation of an additional runway. The airport operator will be consulted on all applications within the safeguarded area for a second runway.*
- 10.20 *As safeguarding of land provides the potential for a southern runway, it is important to ensure that noise sensitive development is not located in an area which could become unacceptably noisy in the future due to air traffic movements from a southern runway. The potential future noise contours for this runway, set out in the Gatwick Airport Master Plan, will therefore be used to assess planning applications for noise sensitive proposals within the borough.*

- 10.21 *The Gatwick Airport Master Plan requests that local planning authorities use the revised safeguarding boundary shown in the Master Plan. The council has considered the Airport Layout: Additional Runway shown in Plan 20 of the Master Plan and has included within the Local Plan safeguarded boundary the land that would be required to accommodate a southern runway, including the diversion of the A23. However, the Local Plan safeguarded boundary has not included all the land east of the Balcombe Road which is shown in the Master Plan as being utilised for a large area of surface car parking. Given the constrained land supply within the borough and its significant employment and housing needs, the council does not consider surface parking to represent an efficient use of land. The Airport is already accommodating parking more efficiently through decked and robotic parking, and its Surface Access Strategy seeks to reduce access to the airport by car. This area excluded from safeguarding is essential to meet Crawley’s employment floorspace needs and is allocated in Policy EC1 as a Strategic Employment Location.*
- 10.22 *The issue of runway safeguarding should be distinguished from that of aerodrome safeguarding which considers the impact of proposals on the operation of aircraft. Policy DD5 relates to Aerodrome Safeguarding.*



 Gatwick Airport Boundary (Policy EC1, EC2, GAT1 - GAT4)  
 Safeguarded Land (Policy GAT2)

### **Gatwick Related Car Parking**

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



### Policy GAT3: Gatwick Airport Related Parking

The provision of additional or replacement airport-related parking will only be permitted where:

- i) it is located within the airport boundary; and
- ii) it is justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport.

#### **Reasoned Justification**

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

#### **Employment Uses at Gatwick**

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

### Policy GAT4: Employment Uses at Gatwick

The loss of airport-related employment floorspace within the airport boundary will be permitted where it can be demonstrated that development will not have a detrimental

impact on the long term ability of the airport to meet the floorspace need necessary to meet the operational needs of the airport as it grows.

New non-airport related employment floorspace within the airport boundary will only be permitted where it can be demonstrated that:

- i. this will not have a detrimental effect on the long term ability of the airport to meet the land and floorspace requirements necessary to meet the needs of the airport as it grows; and
- ii. it will not have an unacceptable impact on the role and function of the other Main Employment Areas within Crawley Borough and town centres and employment areas beyond Crawley's boundaries.

### **Reasoned Justification**

10.29 *Recent years have seen an increasing level of vacant office property at the airport, due in part to the changing needs of airlines and airport businesses which require less office space than previously. The council has recently allowed the temporary relaxation of conditions for a period of three years on some office developments at the airport. Whilst recognising the changing nature of airport operations and the economic growth needs of the borough, it is important that the airport continues to be able to cater for operational needs without requiring, in the future, the development of additional land beyond its boundary to meet its operational needs as it expands.*

10.30 *In addition to existing office floorspace, on-going changes in airport operational trends and efficiencies may also provide scope for other buildings and sites within the airport boundary to be used for other purposes. It is important though that non-airport uses do not prejudice the current and future operational requirements of the airport as its passenger throughput increases. It is also important that the impact of non-airport related commercial development at the airport does not have a detrimental impact on the policy objectives for Crawley Town Centre and Manor Royal, and town centres and employment areas in neighbouring areas which may be affected by such development. Any proposals would also be tested against all other relevant policies in the Plan for development of this nature.*



## Crawley Town Centre

- 11.1 At the heart of Crawley is the Town Centre, originally planned as a retail, commercial and civic centre as part of the New Town. Centred around Queens Square and County Mall shopping centre, it extends to Memorial Gardens in the east, west to the historic High Street, north to Crawley Leisure Park and south to Crawley Railway Station.
- 11.2 The Town Centre performs a number of important roles. It is a leading sub-regional destination for retail and leisure, popular with Crawley residents and attracting visitors from a wider catchment outside the borough. It is a place to work, designated as a Main Employment Area and employing 13,450 people (14% of all jobs in Crawley) across a range of sectors including retail, administrative and professional business services. It is also a sustainable place to live, with a residential population that has risen to approximately 1,150 people in recent years. Moving forward, significant new residential development is planned and it is recognised that the Town Centre, as well as being a retail, leisure and employment destination, is diversifying to become a neighbourhood in its own right.

### Chapter Content

- 11.3 This chapter establishes the planning strategy for Crawley Town Centre, recognising its important role for local communities and applying a positive approach to support its growth, management and adaptation. The policies within this chapter pro-actively support the role and function of the Town Centre, seeking to build upon its existing strengths as a retail, leisure and commercial destination, and balancing these with its growing role as a place to live. The challenges facing town centres are also recognised, not least those posed by out-of-centre and online retailing, and as a result of economic impacts arising from the Covid-19 pandemic. Therefore, the policies within this chapter seek to ensure that the vitality and viability of the Town Centre is supported, and that sufficient flexibility is in place to enable it to respond positively and effectively to changes in circumstance over the Plan period.

### The Key Issues

- 11.4 Crawley Town Centre is healthy, vibrant and competitive, offering a good mix of shops, restaurants and leisure uses and providing a pleasant environment for residents and visitors. It benefits from excellent sustainable transport links, and is well served by rail and bus. It also has a significant cluster of professional services employers, including those offering legal, financial, recruitment, marketing and property services. These factors make an important contribution to the sustainability of the Town Centre economy. The Town Centre has recently undergone significant regeneration, with £5.4m of improvements made to the public realm in [Queens Square](#) at the heart of the Town Centre, and the adjoining [Queensway and The Pavement](#). Additional plans are well progressed to further transform the Town Centre public realm through the Crawley Growth Programme.
- 11.5 Like many town centres, Crawley also faces challenges, particularly from the growth of internet shopping, which has significantly affected the retail sector and, more widely, the immediate economic impacts of COVID-19. Crawley Town Centre has needed to adapt, diversifying its offer to include a greater range of leisure- and experience-focused main town centre uses, cafes and restaurants. There is an increasing contribution to be made to town centre vitality and viability by other uses including offices, community space, and facilities to support a growing town centre

residential population. Recognising the Town Centre as a well-connected and sustainable location for people to live, the growing residential population is itself adding further footfall and vibrancy.

- 11.6 The Crawley Retail, Commercial Leisure and Town Centre Neighbourhood Needs Assessment (2020) has evaluated Crawley's strengths and weaknesses as a town centre, and has identified growth forecasts for the Plan period. The study finds that Crawley Town Centre has proven to be relatively robust to the challenges facing many town centres, retaining much of its market spend, as opposed to this being lost to other centres within the catchment area. Based on Crawley's full housing need being met within and close to Crawley, the study identifies capacity for between 5,800sqm to 10,000sqm new convenience retail floorspace, and between 21,800sqm to 29,700sqm comparison retail floorspace over the Plan period to 2036.
- 11.7 These are uncertain times for town centres, and it is vital that Crawley Town Centre is able to adapt and diversify in light of changing circumstances to help ensure its vitality and viability over the longer-term. It is not just retail that makes for a successful town centre, and a range of main town centre uses can help generate footfall and activity. Through positively planning for a range of main town centre uses, including those which that support the day-time and evening economy, and balancing this with opportunities for residential development and supporting neighbourhood facilities and services, the Local Plan puts in place a framework that will enable Crawley is able to diversify and adapt over the Plan period, ensuring it is best placed to build upon its established role as a vibrant and competitive sub-regional town centre.

## Local Plan Policies

### Primary Shopping Area

- 11.8 The Primary Shopping Area represents the heart of Crawley Town Centre, and is the location in which its retail offer is concentrated. It is divided into primary and secondary shopping frontages. The primary shopping frontages, including Queens Square, County Mall and The Martlets, provide a retail-led mix of uses and attract a significant footfall of customers. The secondary frontages, including The Broadway, The Boulevard, Broad Walk and High Street, are typically more peripherally located, and offer a more diverse range of main town centre uses, including restaurants, drinking establishments, takeaways and offices. Above ground floor level, upper floors present opportunities for a range of main town centre uses, residential, and neighbourhood facilities to support the growing Town Centre population.

### Strategic Policy TC1: Primary Shopping Area

Development that enhances the vitality and viability of Crawley Town Centre as a competitive sub-regional town centre will be supported.

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

Within Primary Shopping Frontages at ground floor level, development within Use Class E (Commercial, Business and Service Use) will normally be permitted.

Within Secondary Shopping Frontages at ground floor level, development within Use Class E (Commercial, Business and Service Use), drinking establishments (Sui Generis), and hot food takeaways (Sui Generis) will normally be permitted.

Other main town centre uses will normally be permitted within the Primary Shopping Area, provided it can be demonstrated through a proportionate Economic Statement, that the proposed use will support the overall vitality and viability of the Town Centre.

The effective and efficient use of upper floors within the Primary Shopping Area for main town centre uses, town centre neighbourhood facilities, or residential use, is supported, subject to meeting the requirements of Policy EC2 where a net loss of employment floorspace is proposed.

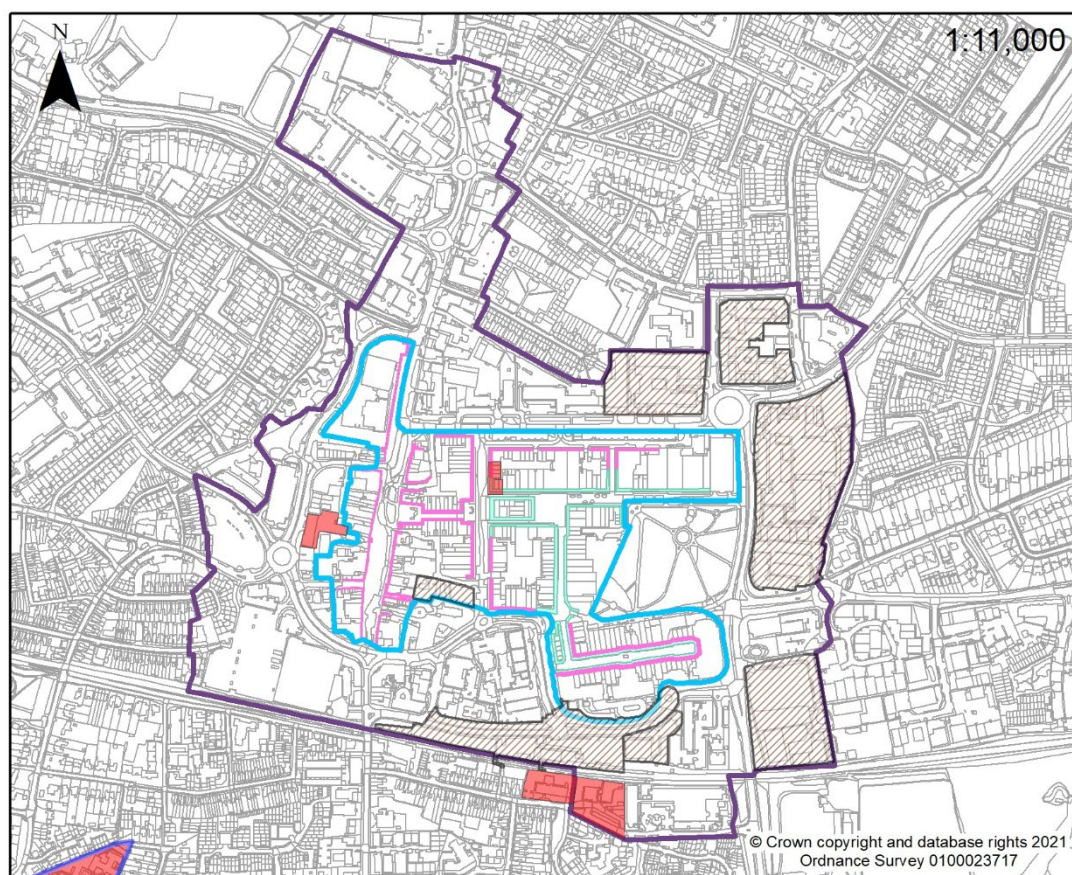
The amalgamation or sub-division of units at ground and upper floor levels will be supported, subject to the requirements of Policy EC2 where loss of employment floorspace is proposed.

### **Reasoned Justification**

- 11.9 *Crawley is a leading Town Centre within the sub-region, popular with residents and visitors, and represent a key location for retail, leisure, employment, and increasingly residential uses. Crawley's strong shopping offer is the core factor that shapes the heart of the Town Centre, and will continue to be moving forward, supported by a range of other main town centre uses that provide interest and variety. However, in challenging times for the retail sector, it is vital that Crawley Town Centre is planned for in a positive and flexible manner that enables it to respond effectively to change so that it is able to retain its long-term vitality and viability and continue to be a thriving and competitive town centre.*
- 11.10 *On 1 September 2020 the Use Class Order was revised in order to allow for greater flexibility for changes of use. A newly created Class E (Commercial, Business and Service Use) includes shops, financial & professional services, restaurants & cafes, gymnasiums, medical and health services, offices, research & development, and (subject to matters of amenity) light industrial use. Drinking establishments and hot food takeaways are moved to the Sui Generis Use Class. Each of these uses, particularly if designed with active and engaging frontages, can contribute positively in generating footfall and creating a vibrant sense of place. First and foremost, the Town Centre is a main employment area, with a retail core at its heart. Whilst continuing to emphasise the important role of a strong retail core within the Primary Shopping Area, Policy TC1 supports a broad range of uses capable of diversifying Crawley's offer that will help ensure the Town Centre remains a vibrant destination during the daytime and also through the evening into the night.*
- 11.11 *The Primary Shopping Area contains the primary and secondary shopping frontages at ground floor level. The primary shopping frontages are a focus for uses falling within Class E (Commercial, Business and Service Use). The secondary frontages are more flexible, enabling the same uses as for the primary shopping frontages, but also supporting drinking establishments and hot food take-away uses. At ground floor level in both the primary and secondary shopping frontages, flexibility is afforded for other appropriate main town centre uses and town centre neighbourhood facilities provided it can be demonstrated through an Economic Statement that the proposed use would support the overall vitality and viability of the town centre. This flexible approach has historically helped secure the reuse of vacant units, helping to generate footfall and activity.*
- 11.12 *Within the Primary Shopping Area, the use of upper floors for main town centre uses, town centre neighbourhood facilities (Policy TC2) and residential use will be supported provided this is consistent with the 'Agent of Change' principle with regards to matters of residential amenity, and with Policy EC2 where a loss of employment floorspace is proposed.*
- 11.13 *It is not the intention to support residential development at the expense of the Town Centre as a main employment area, and whilst the principle of residential is supported in many cases, it is vital that a balance is struck to ensure that the retail and economic role of the Town Centre is not undermined. Residential development will not be acceptable in locations where this would impact negatively on the vitality*



and viability of the Town Centre, and residential development that would undermine the function of the Town Centre as a main employment area will be refused. The Primary Shopping Area should retain a retail-led economic focus, particularly through promoting active frontages and an engaging street scene. Therefore, residential use will not be acceptable at ground floor level in the Primary Shopping Area.



- |  |  |
|--|--|
|  Key Housing Sites (Policy H2)                                    |  Primary Shopping Area (Policy TC1-TC5)       |
|  Housing for Older People and those with Disabilities (Policy H2) |  Primary Shopping Frontage (Policy TC1-TC5)   |
|  Town Centre Key Opportunity Site (Policy TC3 and H2)             |  Secondary Shopping Frontage (Policy TC1-TC5) |
|  Town Centre Boundary (Policy EC1, EC2, TC1-TC5 H2, H3c)          |  |

## Town Centre Neighbourhood

11.14 Crawley Town Centre is a sustainable location for residential development, as recognised through the mixed use allocations of Policy TC3 (Key Opportunity Sites within the Town Centre Boundary) and also through its identification under Policy H2 (Key Housing Sites) as a broad housing location. The Town Centre residential population has grown significantly in recent years, both as a result of planned developments and also through Permitted Development. This has meant the number of residents living in the Town Centre has increased significantly and, from a starting point of 214 residential units in 2014, there are now over 1,000 dwellings in the Town Centre, and a residential population of around 1,150 people. It is anticipated that, over the Plan period to 2037, a further 2,200 dwellings will come forward in the Town Centre, bringing the total to just over 3,000 residential units.

11.15 As a planned New Town, Crawley is designed on the ‘neighbourhood principle’; that is, the town has been developed on the basis of planned neighbourhoods, each designed to provide its residents with sustainable local access to the facilities and services that are required to meet the day-to-day needs. It is though recognised that the Town Centre, having increased its residential population over a relatively short

timeframe, lacks some of the supporting facilities that Crawley's purpose-planned neighbourhoods benefit from. The provision of neighbourhood facilities can support the needs of town centre residents, and if carefully planned, can help generate activity that enhances Town Centre vitality and viability, and can make for an efficient use of disused space, particularly at upper floor level.

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

To facilitate the changing role of Crawley Town Centre, development of town centre neighbourhood facilities to meet the needs of its growing residential population will be supported. Such Town Centre neighbourhood facilities fall broadly within Use Classes E (Commercial, business and service), F1 (non-residential institutions) and F2 (local community uses) and may include:

- i. Local shopping facilities;
- ii. Community facilities, including community halls, flexible community space, and space for religious or faith activities;
- iii. Healthcare;
- iv. Education;
- v. Leisure provision;
- vi. Accessible high quality green, open or recreational amenity space.

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

In all cases, Town Centre neighbourhood facilities must support, and not undermine, the vitality and viability of the Town Centre. Where the provision of town centre neighbourhood facilities would result in a net loss of employment floorspace, the requirements of Policy EC2 must be met.

### **Reasoned Justification**

- 11.16 *With an increasing residential population, the Town Centre is beginning to become a neighbourhood in its own right. However, the rapid nature of this growth, combined with a significant proportion of the residential coming forward through Prior Approval (and consequently currently with no developer contributions), has meant that the Town Centre does not benefit from the same range of supporting facilities and services as Crawley's purpose-built neighbourhoods.*
- 11.17 *The Crawley Retail, Commercial Leisure, and Town Centre Neighbourhood Needs Assessment (2020) has considered in further detail whether sufficient supporting infrastructure, facilities and services are in place to support the growing Town Centre population. The assessment finds that Crawley Town Centre currently provides local residents with good access to shops, services, leisure activities and community facilities, and does not identify any pressing gaps within these sectors that are forecast to arise as a result of anticipated population growth within the Town Centre. Notwithstanding this, the study recognises that both leisure and community facilities can both play an active role in contributing to the functionality of the Town Centre and identifies a growing need for health care facilities, including GP and dental services.*
- 11.18 *The Town Centre is a main employment area, and in many cases town centre neighbourhood facilities will perform an employment function. However, where proposed town centre neighbourhood facilities would not provide an employment function, and would result in a loss of employment floorspace, it will be necessary to demonstrate through an Economic Statement that the requirements of Policy EC2 are met. Where town centre neighbourhood facilities are proposed, these should not undermine the operation of existing uses, as per the NPPF 'agent of change' principle, and it will be necessary to demonstrate how the proposed use supports,*



*and does not undermine, town centre vitality and viability. Again, this should be set out through an Economic Statement.*

### **Town Centre Key Opportunity Sites**

- 11.19 There are a number of under-utilised Key Opportunity Sites within the Town Centre Boundary that present significant scope for development to help accommodate identified needs in sustainable and accessible locations. The Local Plan seeks to secure the regeneration and improvement of brownfield sites through standalone and mixed-use development that helps to support and diversify Crawley's role as a sub-regional centre, enhances the vitality and viability of the Town Centre, provide facilities for new and existing residents, strengthens the town's non retail employment base, improves links between different areas of the Town Centre, and creates a good living and working environment.
- 11.20 Recognising the identified need for both employment and residential land, the Town Centre Key Opportunity Sites should seek to deliver development comprising main town centre uses or mixed-use development that comprises residential use with either main town centre uses and/or town centre neighbourhood facilities.

### **Policy TC3: Town Centre Key Opportunity Sites**

The following Town Centre Key Opportunity Sites are identified for development that enhances town centre vitality and viability and helps to meet the economic and housing needs of the borough:

- Telford Place, Three Bridges;
- Crawley Station and Car Parks;
- County Buildings;
- Land North of the Boulevard;
- Crawley College (mixed use development with priority for education);
- Cross Keys;
- MOKA.

At these sites, development will be supported where it is for:

- a. main town centre uses, or
- b. mixed use development for residential and main town centre uses and/or town centre neighbourhood facilities.

It should be demonstrated that:

- i. the development positively contributes to the vitality and viability of Crawley Town Centre and sustainable economic growth and job creation in the borough; and
- ii. where retail use is proposed outside the Primary Shopping Area, that the sequential and (where applicable) the impact tests (as per Policy TC5) are satisfied; and
- iii. where a net loss of employment land or floorspace is proposed, the requirements of Policy EC2 are satisfied; and
- iv. where no residential is proposed, the development will not undermine the delivery of a minimum of 1,500 net dwellings cumulatively across the sites, nor the delivery of the overall minimum housing figure set out in Policy H1; and
- v. where residential forms part of development, the requirements of Local Plan Policy H3c are satisfied.

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

### **Reasoned Justification**

- 11.21 *The council wishes to encourage the regeneration and efficient use of under-utilised sites within the Town Centre Boundary, particularly where this will maximise the potential of outworn buildings and underused land. Development at the Town Centre Key Opportunity Sites should support and diversify Crawley's role as a primary sub-regional centre, enhancing the vitality of the Town Centre, and supporting economic and residential growth. There is a real opportunity to provide residential development in a highly sustainable location, and to unlock modern commercial space development which that will uphold the Town Centre's role as a provider of significant business and professional services employment. There is also significant scope to maximise opportunities to provide neighbourhood facilities for new residents, improve the links between different areas of the Town Centre and create a good living and working environment.*
- 11.22 *The Town Centre is needing to adapt and evolve to remain competitive in a changing economic climate. Policy TC3 applies a flexible approach to support a range of appropriate development typologies on the Town Centre Key Opportunity Sites. Development at these sites has significant potential to accommodate a mix of uses and take a balanced approach in meeting the economic and housing needs of the borough. The Town Centre is a highly sustainable location for residential development and, given Crawley's significant level of housing need and constrained housing land supply, the Town Centre Key Opportunity Sites will make an important contribution to housing delivery. At least 1,500 dwellings are anticipated across all of these sites, as part of mixed use proposals. A mix of uses on these sites will ensure the Town Centre's economic function is retained and enhanced, whilst providing the opportunity to accommodate town centre neighbourhood facilities and, where located adjacent to public realm or road frontages, ensure active frontages are provided. Requirements set out in Policy H3c must also be adhered to when designing a scheme which includes a residential element within the Town Centre.*
- 11.23 *Some proposals, which would be of significant benefit to the vitality of the Town Centre and help to meet other needs within the borough, may not be able to accommodate residential into schemes for operational or viability reasons. In these cases, information will be required to demonstrate how the proposals will deliver wider social and economic benefits and that the development as proposed would not impact unacceptably on the ability of the council to meet objectively assessed housing need. B1 office uses would also meet an identified need, and leisure uses would also support the regeneration of the Town Centre. The council, working with WSCC and Crawley College through One Public Estate, has aspirations to create a commercial eastern gateway with significant new office presence on the Town Hall and County Buildings sites. The Employment Land Trajectory anticipates approximately 14,000sqm Civic and B1 floorspace on the Town Hall site, and 5,000sqm B1 floorspace on the County Buildings site.*
- 11.24 *This Policy identifies specific Key Opportunity Sites where mixed-use development is promoted. Policy H2 identifies other sites within the Town Centre that are specifically for residential development, and identifies the whole Town Centre as a broad location for future housing in the anticipation that other sites may come forward over the Plan period.*

### **Active and Engaging Frontages**

- 11.25 The role of Crawley Town Centre is changing, and to help support its ongoing competitiveness, the Local Plan is positive in encouraging a range of main town centre uses, neighbourhood facilities, residential, and mixed-use development. These uses can all contribute to the vitality and viability of the Town Centre, but new

development must be carefully planned and designed to ensure that it engages and interacts positively with the public realm.

- 11.26 The use of active frontages, where there is an active visual engagement between the public realm and the ground floors of buildings, generates vibrancy and can encourage footfall. Active frontages can be incorporated into a range of main town centre developments to ensure that ground floor development adjacent to the public realm contributes positively to the Town Centre's overall sense of place and its role as a location for people to visit, live and enjoy.
- 11.27 Conversely, poorly designed development that does not appropriately engage with the public realm can undermine the Town Centre environment. Inactive frontages, such as blank façades or closed window displays, can create a hostile and unwelcoming aesthetic that reduces legibility and vibrancy, and should be avoided.

#### **Policy TC4: Active and Engaging Frontages**

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

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

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

#### **Reasoned Justification**

- 11.28 *As the range of Town Centre uses becomes more diverse, the incorporation of active frontages into development can play a key role in ensuring that a positive interaction is retained with the street scene. Carefully designed frontages will help generate activity and interest, supporting the overall vitality and vibrancy of the Town Centre. Development that is adjacent to the public realm (whether the street, or formal/informal public space, including parks) must provide a positive interface to the public realm.*
- 11.29 *In doing so, the positive relationship between a development and its adjacent public realm will better integrate development into the urban fabric, promoting activity, interest and a sense of safety to its setting. This quality is assisted where the front façade of buildings, including the main entrance, face and open towards the street. The objective of achieving active frontages can be realised through a variety of means. Overall, the desirable outcome is avoiding blank walls to increase visual interest, generate activity and improve surveillance. As residents will seek privacy, ground floor dwellings with windows fronting onto public realm or streets, unless carefully designed, could result in a blank façade as residents use blinds or curtains permanently. The incorporation of other uses attracting visitors at ground floor level can help create activity.*

#### **Town Centre First**

- 11.30 The Local Plan vision recognises the vital role of Crawley Town Centre in providing a social, employment, cultural, entertainment and retail focus for people and

communities within Crawley and the wider area, and supports its evolution as a healthy and competitive centre. As recognised by national planning policy, it is important to support the function of town centres, directing the development of main town centre uses to the Town Centre in the first instance, and ensuring that where main town centre uses are proposed outside the Town Centre or neighbourhood centres, that these do not result in a significant adverse impact on the Town Centre itself, or other centres within the retail catchment. The Local Plan responds to these national objectives by setting out requirements for the NPPF sequential and impact tests within a local context.

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

Proposals for main town centre uses in Crawley will follow the NPPF ‘town centre first’ approach, with development directed to the most sequentially preferable and sustainable locations.

Development of main town centre uses in edge-of-centre or out-of-centre locations will be permitted where it can be demonstrated that:

- a) the proposed development cannot be met on more sequentially preferable sites, having applied the sequential test; and
- b) for retail or leisure use, the development will not have a significant adverse impact on the vitality and viability, including local consumer choice and trade, of Crawley Town Centre, Neighbourhood Parades, or other centres within the retail catchment, as existing and planned.

In assessing the impact of edge-of-centre or out-of-centre retail development under part b), an impact assessment will be required for development of 500sqm gross floorspace or greater.

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

Neighbourhood Parades are Local Centres in Crawley’s retail hierarchy. Development at the Neighbourhood Parades will not be subject to the NPPF sequential or impact tests, though must meet the requirements of Local Plan Policy EC11.

### **Reasoned Justification**

11.31 *Both retail and leisure uses represent a key focus of Crawley’s Town Centre offer, and edge-of-centre and out-of-centre proposals have the potential to impact negatively upon town centre vitality and viability. Therefore, where main town centre uses are proposed in either edge-of-centre or out-of-centre locations, it will be necessary to demonstrate that the requirements of the NPPF sequential test are satisfied, with development first directed to town centre locations before other, less sequentially preferable, locations can be considered.*

11.32 *For the purposes of policy interpretation, for retail uses Town Centre sites are defined as those locations falling within the Primary Shopping Area as identified on the Local Plan Map. Sites falling outside of the Primary Shopping Area, though within the Town Centre Boundary, are defined as edge-of-centre sites and these are the next most sequentially preferable sites. With the exception of the Neighbourhood Parades, all locations beyond the Town Centre Boundary, in retail terms, represent out-of-centre locations. All other main town centre uses, unless otherwise stated should be directed to sites within the Town Centre Boundary, before edge-of-centre*

*(within 300 metres of the Town Centre Boundary) or out-of-centre locations are considered.*

- 11.33 *Crawley's Neighbourhood Parades perform an important local function, offering a range of shops and services to meet the day-to-day needs of residents. Each neighbourhood centre serves a localised catchment in the region of 2,500 homes, and their operation is akin to that of a local centre. Given the important local role of the Neighbourhood Parades, Policy EC5 recognises these as appropriate locations for retail, and the NPPF sequential and impact tests will not apply at the Neighbourhood Parades. Development will however be required to comply with Local Plan Policy EC11 (Neighbourhood Centres).*
- 11.34 *County Oak Retail Park and London Road Retail Park provide a significant out-of-centre retail warehouse offer. These locations are not designated as centres, and applications for main town centre uses in these locations will be required to satisfy the requirements of the NPPF sequential, and as required, impact tests.*
- 11.35 *As identified through Policy EC5, office development within the designated Main Employment Areas, and at sites outside the Town Centre Boundary that are within 500 metres of a public transport interchange, will be exempt from the sequential test. This reflects the approach of protecting and supporting the established economic function of the Main Employment Areas as a focus for economic growth. As per Policy EC6, hotel and visitor accommodation development within the Gatwick Airport boundary will also be exempt from the sequential test.*
- 11.36 *There is capacity for up to 10,000sqm convenience retail floorspace and up to 29,700sqm comparison retail floorspace over the Plan period to 2036. Where retail or leisure development is proposed outside of the Town Centre Boundary, impact on the vitality and viability of Crawley Town Centre, Neighbourhood Centres, and other centres within the retail catchment as existing and planned, will be a material planning consideration.*
- 11.37 *Notwithstanding the relative strength of Crawley Borough as a whole, the Town Centre specifically has suffered a fall in market share of overall spending at physical stores in the last decade as shoppers have turned to online shopping and out-of-centre retailers. This trend has potential to 'chip away' at the vitality and viability of the Town Centre. Edge-of-centre and out-of-centre retail development, even where this is of a quantum that falls beneath the NPPF threshold of 2,500sqm, has the potential to impact negatively on the health of the Town Centre. Therefore, for retail development, a locally specific threshold of 500sqm gross floorspace is set as the point at which a proportionate retail impact assessment will be required. For leisure development, the NPPF threshold of 2,500sqm as the trigger for undertaking an impact assessment will apply.*
- 11.38 *Retail planning applications may take a number of forms, including for standalone development, extensions that would result in a gross retail floorspace increase, or applications to vary the range of goods sold from an existing retail unit. In all cases, it will be important that matters of impact on the Town Centre, Neighbourhood Parades and other centres within the retail catchment are appropriately considered and evidenced by the applicant to ensure there is not a significant adverse effect arising from the proposed development.*
- 11.39 *The impact of edge-of-centre or out-of-centre retail or leisure development will be determined by a number of factors, including (but not limited to) forecast trade draw and the extent to which the type of development proposed is considered to compete with or complement existing and planned town centre uses on a like-for-like basis. As such, where the relevant impact threshold is triggered, edge-of-centre or out-of-centre retail or leisure proposals will be required to demonstrate that the*



*development will not result in a significant adverse impact on the Town Centre or deliverability of planned investment, particularly at the Town Centre Key Opportunity Sites identified by Policy TC3. Applications should be accompanied by a proportionate impact assessment to demonstrate that the proposal is acceptable in impact terms, making clear how the proposed development would complement, rather than compete with, the current/future town centre, neighbourhood centre offer, and the offer of other centres in the retail catchment.*

- 11.40 *The Town Centre Supplementary Planning Document (2016) provides further guidance on the application of the sequential and impact tests in Crawley. This document will be updated as set out in the Local Development Scheme.*

## Housing

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

*By 2037, 5,300 new homes will have been built to support the needs of the growing population. A mix of new homes will be designed for residents in all stages of life. These will be built in locations which respect the town's unique development and design principles and preserve the most valued of the town's environmental features.*

## Housing Delivery

- 12.1 The population of Crawley has been rising significantly over the past three decades, increasing by about 22% from 88,750 in 1991 to 106,600 in 2011, it now stands at approximately 113,500 residents. In Crawley, population growth has been driven strongly by natural change (i.e. births outnumbering deaths), due to the typically younger population structure reflecting its New Town history. Crawley also sees a notable level of international migration and net out-migration compared to other parts of the country. Crawley's population is expected to grow by over 16% over the period 2019-2039<sup>92</sup> to reach 135,262 residents.
- 12.2 The Northern West Sussex Housing Market Area overlaps closely with the Crawley Travel to Work Area and is characterised by a high level of self-containment, reflecting the strength of Gatwick Airport and Manor Royal. However, whilst the labour market area extends to include Horley, Redhill, Leatherhead and Dorking (essentially extending north to the M25), there is a significant difference in house prices in the authorities north of this Housing Market Area.
- 12.3 Crawley is a compact borough, with developable land suitable for housing further constrained by the presence of the airport in the north of the borough. The town's recent history as a twentieth century New Town means the area was comprehensively planned and built out on a neighbourhood basis. A further neighbourhood was added in the 1990s (Maidenbower), and the most recent neighbourhood, Forge Wood, located to the North East of the built-up area, is now under construction to provide around 1,900 dwellings supported by neighbourhood community facilities. In addition to these neighbourhood developments and limited intensification of the small areas of unconstrained land within the built-up area, a further new neighbourhood beyond the borough boundary to the west (Kilnwood Vale) in Horsham District is also under construction.

### Chapter Content

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

### The Key Issues

#### **Past House Building:**

- 12.5 The number of dwellings built each year has varied considerably in Crawley. Following a peak in house building in 2007/08, there was a significant reduction in completions, despite a considerable number of planning permissions granted. This was largely due to the national economic downturn. Since the preparation and adoption of the current Crawley Borough Local Plan in 2015, delivery has been increasing, and completions have significantly exceeded the average annual requirement set out in the adopted Plan (340 dwellings per annum). Consequently, Crawley comfortably passed the government's national Housing Delivery Test in 2018 and 2019, scoring 181% and 235% respectively.
- 12.6 Notwithstanding this, delivery fell short of the 2015 Local Plan Housing Trajectory. This predicted a peak in delivery in 2017/18, whereas that year actually saw delivery

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<sup>92</sup> 2014-Based Population Projections, Northern West Sussex Strategic Housing Market Assessment (2019) Icen Projects

fall in comparison with 2016/17. Failure to achieve the levels of delivery detailed in the Housing Trajectory has primarily been due to delays in the coming forward of a number of key site allocations. Windfalls on the other hand have been higher than anticipated, particularly in the form of developments benefiting from permitted development rights for the conversion of offices to dwellings. Of the 2,490 gross completions over 2015-20 32% came from developments benefiting from these permitted development rights, where extraordinary densities have been achieved that would not otherwise have been approved through a formal planning application.

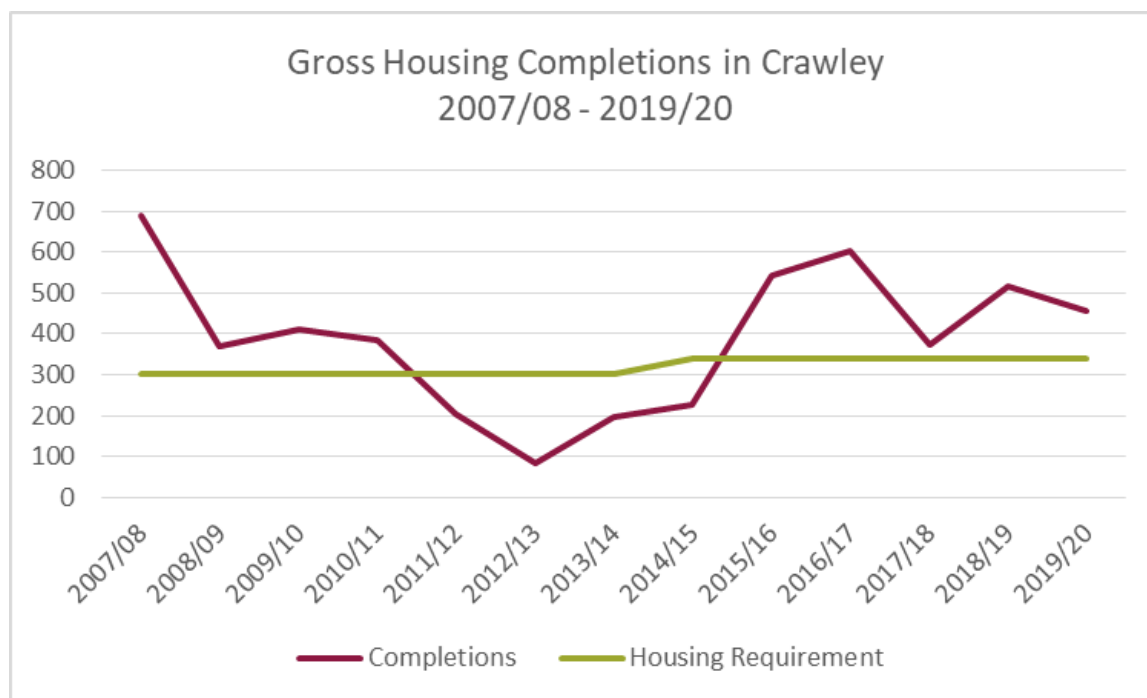


Fig 5: Gross Housing Completions in Crawley 2007/8 – 2019/20

### Housing Need:

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

12.8 Crawley’s total annual housing need, based on the Standard Method, is 750 dwellings per year.

#### MHCLG Standard Method Housing Need Calculation

Households 2021	48,516
Households 2031	54,218
Change in Households	5,702
Per Annum Change	570
Affordability Ratio (2020)	9.05
Affordability Uplift to Household Growth	31.56%
<b>Total Need (dwellings per annum)</b>	<b>750</b>

### **Housing Land Supply:**

- 12.9 Local authorities are encouraged to deliver a wide range of high quality homes, to widen opportunities for home ownership and to create sustainable, inclusive and mixed communities. In doing so, planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (i.e. families, elderly, and people with disabilities).
- 12.10 Using a flexible approach, empty houses and buildings should be brought back into residential use and where appropriate, powers of compulsory purchase used more widely. Planning policies should avoid the long term protection of sites and land allocations should be regularly reviewed. Proposals for mixed tenure residential development should generally be approved where there is an identified need for additional housing provided there are no reasons why development would be inappropriate.
- 12.11 Crawley's development as a series of comprehensive neighbourhoods, many of which have also accommodated a significant amount of infill housing in the last decade, means that the capacity of the built up area to accommodate further housing is limited. The planned areas of open space (both formal and informal) within the neighbourhoods are clearly highly valued by local residents for their amenity and recreational value. The tight relationship between the Built-Up Area Boundary and the borough's administrative boundary further limits capacity. The need to safeguard land for a potential second runway at Gatwick Airport, together with the noise contours associated with both a single and potential southern runway scenario, limits the potential for additional housing in the northern parts of the borough. In line with Policy EP4, housing development will not be permitted in noise contours above the 60dB LAeq 16hr noise threshold both for the existing and potential southern runway. Areas on the periphery of Crawley, both within and outside the borough boundary, will continue to be assessed in partnership with the adjoining authorities.
- 12.12 As the land within Crawley is constrained, it is anticipated that the adjoining authorities will be asked to meet approximately 50% of Crawley's housing need. However, this is predominantly in the form of market housing, where the market has choice. Duty to Cooperate discussions will include reference to the need to address meeting Crawley's critical affordable housing need, in particular where developments are close to Crawley's boundaries, although this is unlikely to meet Crawley's full unmet affordable need. This places a greater emphasis on the need to secure affordable housing from those schemes within the borough, whereby the council's percentage affordable requirement achieves significantly less if also accounting for the out of borough housing provision. Therefore, the council intends to robustly defend its affordable housing policy on residential developments, particularly through on-site provision of affordable housing, within the borough.

### Crawley's Strategic Housing Land Availability Assessment

- 12.13 To determine a realistic assumption for the quantum of housing land supply within the borough, a Strategic Housing Land Availability Assessment (SHLAA) has been undertaken<sup>93</sup>, and forms part of the evidence base for the Local Plan. The primary role of the SHLAA is:
- The identification of sites potentially suitable for housing development;
  - An assessment of the housing potential and the capacity of these sites;
  - An assessment of their suitability, availability and achievability; and
  - An assessment of the likely timeframe for development of these sites.
- The SHLAA does not determine whether a site should be progressed through the Local Plan process as a housing allocation, nor does it automatically mean that planning permission is certain. It merely carries out an assessment of sites that could

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<sup>93</sup> Crawley Strategic Housing Land Availability Assessment (September 2020) CBC



be suitable for housing development, and whether and when such sites could be developed.

- 12.14 Taking into account the suitability, availability, achievability and deliverability of housing sites within the borough, the SHLAA has identified a housing land supply which provides a total of 6,461 net dwellings including windfalls over the period 2019-37<sup>94</sup>. Over the Plan period (i.e. excluding those built during 2019/20 and 2020/21) this amounts to 5,316 net dwellings.

#### Crawley's Windfall Allowance

- 12.15 The NPPF states that local planning authorities can make an allowance for windfall sites in the housing land supply, if compelling evidence is put forward that such sites have and will consistently become available. This allowance should be realistic, having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates, and expected trends.
- 12.16 It is anticipated that an average of 90 dwellings per annum will come forward through windfall sites over the period 2021-37, amounting to 1,440 dwellings altogether during the Plan period, as detailed in the council's Housing Trajectory.

#### **Urban Extensions: 'At Crawley'**

- 12.17 Over recent years, increasing numbers of houses are being built on the peripheries of Crawley's urban and administrative boundaries. Whilst, in some cases, this has been promoted through joint planning between Crawley and neighbouring authorities to come forward as comprehensive new neighbourhoods, such as Kilnwood Vale (2,650 new dwellings<sup>95</sup>), in most other cases this has come forward in piecemeal individual developments of between 30 and 600 new dwellings at a time, tacked on to the existing urban infrastructure.
- 12.18 Well planned urban extensions which provide comprehensive, sustainable new neighbourhoods with local facilities and services, relate well to their rural landscape character and protect the setting of Crawley's neighbourhoods could form an important way to meet Crawley's housing needs. Therefore, the Local Plan acknowledges that other potential urban extensions to Crawley outside its administrative area could be explored in the future in order to meet the arising housing need of the borough. This work will need to test whether this approach is agreed as a sustainable location in the context of the wider Housing Market Area and travel to work area, and whether the existing infrastructure and environmental constraints can be resolved<sup>96</sup>.
- 12.19 In these cases, developments should be laid out and designed to be reflective of their location as part of Crawley and should not result in harm to the setting of the master planned New Town nor result in urban sprawl nor unplanned merging of settlements. They should protect the setting of Crawley's existing neighbourhoods at the edge of the countryside. New development, by its very nature, will always have a significant impact on the sense of place, space and open setting of an area, both perceived and tangible. Careful analysis is therefore required to assess whether certain elements of landscape structure, form, or character are a major component of or contributor to an established, recognised and enjoyed rural landscape setting. Not all areas have the same capacity to accommodate change without harm to the landscape setting. For example, where wide tracts of non-enclosed open fields or grassland exist, there is

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<sup>94</sup> Figure is based on the period as shown within the full Housing Trajectory (1 September 2020) to the end of the Plan period: 2037.

<sup>95</sup> The Joint Area Action Plan allocated this neighbourhood for 2,500 new dwellings. The additional 150 dwellings is due to planning permissions granted to change the initial use of the land within the allocation boundary.

<sup>96</sup> Consultation Draft Crawley Borough Local Plan Review, paragraph 2.32, Policy H1 and paragraph 12.11 (2020) CBC

very limited capacity for change to the rural setting without impacting on the character of the area, and the setting of the areas adjacent to it. The proportion, scale and extent of these areas provides a sense of space and far reaching and expansive vistas. They provide a perceived and real sense of tranquillity due to the extensive absence of buildings and human presence and are important close to Crawley where such areas are very limited. In contrast, areas where the setting is characterised by woodlands or enclosed country lanes or hedgerow corridors provide contained views and a sense of enclosure.

- 12.20 In considering urban extensions, the shared evidence base including the Strategic Housing Market Assessment and Economic Growth Assessment should be referred to. Whilst located within Mid Sussex or Horsham Districts, any urban extension on the edge of Crawley should be meeting the unmet housing needs arising from Crawley, and should therefore meet Crawley's specific needs for affordable housing, housing mix, type, and tenure. The scale of urban extensions could also provide the opportunity to meet unmet employment needs, or infrastructure requirements such as education and health, and could provide strategic leisure facilities serving the wider area.
- 12.21 All infrastructure impacts should be considered cumulatively. Urban extensions should meet their own infrastructure needs on site to serve their new residents. It is inevitable that these residents will also access larger scale existing facilities in Crawley, including the town centre, leisure facilities and transport networks. These will also be affected by development within Crawley and it is important that cumulative impacts are assessed and developments fund improvements to ensure there is no adverse impact on Crawley's residents. In particular, the need for a Western Link Road for Crawley has been recognised but it has not yet come forward despite the development of Kilnwood Vale. If further urban extensions are proposed to the west of Crawley the route, design and delivery options for this road will need to be addressed. Policy ST4 provides more details for the section which would extend through Crawley Borough and connect with the A23.
- 12.22 Whilst these developments will be outside Crawley's boundary, the following criteria set out below will be used to inform discussions with neighbouring authorities, including through establishing Statements of Common Ground, and potential developers, and the council's responses to emerging policies and planning applications. Development should only come forward through a Plan-Led process, supported by clear cross-boundary and site-specific Local Plan policies. Where appropriate, Joint Area Action Plans would provide the most robust way to ensure Crawley's needs and concerns are fully addressed. Proposals should be supported by a comprehensive Masterplan agreed by the relevant authorities (including the county council).

#### 'At Crawley' Urban Extensions Key Considerations

- 12.23 Housing development through urban extensions on or close to Crawley's administrative borough boundaries will be supported by Crawley Borough Council where it can be shown that:
- i. Cumulative infrastructure needs are clearly identified and programmed for delivery in coordination with new development, and the proposal would not result in severe cumulative impacts of the development for existing residents in Crawley, including in terms of traffic and transport, flooding and drainage, air quality, town centre and community and social facilities;
  - ii. If development is proposed to the western side of Crawley, the scoping, design and delivery of the comprehensive Western Link Road (connecting from the A264 to the A23, north of County Oak, Policy ST4) 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;

- iii. Crawley's character as a compact town within a countryside setting, developed on a neighbourhood principle which maximises the use of sustainable transport is maintained;
- iv. The design of the urban form and infrastructure is of high quality design which is not unnecessarily prominent in the existing landscape setting;
- v. Developments are designed and progressed as comprehensive neighbourhoods rather than incremental ad hoc development;
- vi. Neighbourhood centres containing local facilities and services are provided in order to meet the day-to-day needs of residents;
- vii. The development helps address unmet development needs arising from Crawley, including in relation to housing mix, type, tenure and affordability (including meeting the 40% affordable housing levels and agreements in relation to the nomination rights for those on the Crawley housing register); complementary employment and economic growth needs; social, education and health needs; and strategic recreation and leisure requirements;
- viii. Linkages are maintained from Crawley's neighbourhoods through new development to the countryside beyond (both in terms of active transport and visual links) as well as prioritising sustainable modes of transport links (public transport, cycling and walking routes) into existing Crawley neighbourhoods and the town centre, making car journeys a longer, more circuitous option;
- ix. A landscape character, setting and heritage appraisal has been undertaken which:
  - a. identifies the scale, extent and spatial characteristics of the existing landscape structure and grain, including natural and man-made features, field patterns, views, landscape structure, tranquillity and sense of space or enclosure, and provides an understanding of how they are experienced, used and perceived; and this
  - b. has led to an assessment of the impact of the development on the landscape character, setting and heritage of the area, and the setting of Crawley's neighbourhoods and development is planned to ensure the key landscape features, character areas, areas of tranquillity and settings are protected, and the way they can be experienced is enhanced.
- x. Development has been designed and planned to carefully address both its connections to existing Crawley neighbourhoods as well as the wider countryside beyond, providing defensible boundaries which both prevents inappropriate merging of settlements or the effects of urban sprawl and ensures the careful stitching together of existing and new built form where appropriate;
- xi. Ancient woodland or veteran trees would not be damaged or lost and an appropriate buffer, in accordance with national guidance, is provided between any such trees and the edge of the development's construction. Any TPO protected trees should be retained where possible and measures to avoid damage and root compaction should be implemented. Where the loss of existing trees is unavoidable, appropriate replacement trees are to be provided;
- xii. Development must incorporate strategic Green Infrastructure throughout, providing ecological linkages, in particular to support pollination, and result in a Net Gain to biodiversity;
- xiii. Development must be designed to exemplar sustainability standards, taking advantage of the potential of a masterplanned approach and economies of scale,

and must design in tight energy and water efficiency targets from the outset in order to futureproof developments for a zero carbon future and a changing climate;

- xiv. Development proposals use bespoke Area Wide Design Assessment tools from the outset which will aim to set out and enable development proposals to identify, understand and fit in with the overall form and layout of their surroundings.

### **Housing for Older People and those with Disabilities:**

- 12.24 Although Crawley has a greater proportion of younger people than the rest of the south east, with 60% of its population under 45 years of age, the need to provide housing for older people is an increasingly important issue for Crawley, with 14% of the population aged over 65<sup>97</sup>. The number of people aged 65 and over has been increasing more quickly than other age groups with projected growth in this age group predicted to increase by 63%, over the 20 year period to 2039. It accounts for 35% of the total projected change, with a growth of 9,600 persons between 2019-39 aged 65+<sup>98</sup>.
- 12.25 Housing elderly people, and meeting their needs through either support or care, is a complex matter. Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. New dwellings, as set out in Policy DD2, should be designed to accessibility standards which allow for future adaptation as the circumstances of the occupiers change, allowing for longer supported independent living.
- 12.26 Providing suitable and alternative housing for older people to move into can free up houses that are under occupied. New housing built to more modern standards of sustainability is also attractive to older people as this offers lower maintenance and running costs. While housing for older people may require special consideration with regards to design, proximity to facilities and security, it is usually considered to be the least intrusive form of new housing development, with a lower impact on traffic, often resulting in a reduced parking requirement, and is thereby more readily accepted by existing local communities. For this reason, provided the densities of any proposals ensure the capacity of the site is maximised, any site considered appropriate for housing development would be positively considered for older people's accommodation through the decision-making process, where this also offers to meet the required affordable housing and affordable care needs (for both C2 and C3 Use Class development).
- 12.27 The Strategic Housing Market Assessment (SHMA)<sup>99</sup> considers the accommodation needs of older people and those with disabilities together, due to the clear links between age and disability. The 2011 Census indicated that 29% of households within Crawley contained someone with a long term health problem or disability. Of these, 52.6% were aged 65 and over, and a further 21.3% were aged between 50 and 64. This is projected to increase by around 7,000 (41%) in Crawley between 2019 and 2039. In particular, there is projected to be a large rise in the number of people with dementia (68%) and those with mobility problems (63%).
- 12.28 Evidence identifies a need for an additional 1,027 units (51 per annum) to meet the population's specialist accommodation need for older people (retirement/sheltered housing; enhanced sheltered and extra-care housing) and an additional 1,029 residential and nursing care bedspaces over the 20 year period from 2019 to 2039. Of these, 56% are anticipated to be in the market sector, with the remaining 44% needed in affordable tenures.

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<sup>97</sup> 2018-based subnational population projections (March 2020) ONS, Figures for 2020

<sup>98</sup> Northern West Sussex Strategic Housing Market Assessment (2019) Icen Project

<sup>99</sup> Northern West Sussex Strategic Housing Market Assessment, Chapter 10 (2019) Icen Projects

- 12.29 Supporting working-age adults who have care and support needs to be as independent as possible is equally important. Extra Care Housing can again contribute to meeting the housing and care requirements of some of these adults. West Sussex County Council sees Extra Care Housing as an all age housing solution and is keen to see barriers (such as aged over 55) removed from the criteria for this type of housing going forward. On this basis, specific allocations for housing for older people will also apply for the provision of Extra Care Housing for all ages.
- 12.30 West Sussex County Council has a target of 500 new Extra Care Housing homes across West Sussex by 2025. This target requires a development programme of at least 100 new homes each year, working in partnership with Districts and Boroughs, and with housing providers such as Registered Providers with experience of development of Extra Care Housing. Although there are existing Extra Care Housing schemes in Crawley, there is still, by the available measures, an undersupply of Extra Care Housing. Therefore, there is a need for further development in Crawley in order to meet the estimated demand for two schemes of 60 homes each over the Plan period.
- 12.31 Extra Care Housing schemes can additionally offer services to the local community and develop as a community resource, as well as offering employment and training opportunities in the local communities they serve. Mixed tenure schemes of Extra Care Housing located in areas where the care and support provider could recruit, and which are well located in terms of local available facilities, will be supported.
- 12.32 As Care Home stock forms a very specific part of the housing needs market, it is considered this falls within the definition set out in the CBLP for 'Infrastructure' which confirms that: "infrastructure includes a wide range of services and facilities such as"... "health, social infrastructure, community facilities"... Policy IN1: Infrastructure Provision, therefore, applies in relation to the protection of existing Care Home facilities. Under this Policy the loss of such provision through the redevelopment of sites for alternative uses would be prevented unless an equivalent replacement or improvement is provided, or there is sufficient alternative offer in the area.

## Local Plan Policies

### Housing Provision

- 12.33 The Local Plan provides a supply of housing sites to support delivery towards meeting the needs of present and future generations, whilst reflecting the physical constraints of the borough and the other policy objectives within this Plan.
- 12.34 These constraints include Local Green Space, designated heritage assets (Listed Buildings, Conservation Areas and Scheduled Monuments), Local Wildlife Sites, ancient woodland, structural landscaping, possible airport expansion/aircraft noise, and open space and floodplains. These constraints, together with the tight relationship between the Built-Up Area Boundary and the borough's administrative boundary, significantly limit capacity. The exception to this are the potential opportunities which may be found for higher density schemes within a greater mixed use Town Centre.
- 12.35 It is, therefore, recognised that continued cross-boundary working to understand the nature of the wider housing market area is essential to ensure that housing needs are being met in an appropriate and functional manner. There is already a long-established means of working through numerous joint evidence base documents, a joint Development Plan Document for the West of Bewbush neighbourhood (with Horsham District Council), and the Gatwick Diamond Local Strategic Statement and Memorandum of Understanding.



## Strategic Policy H1: Housing Provision

The council will positively consider proposals for the provision of housing to meet local housing needs, taking a pro-active approach to identifying suitable sites for housing development and working to overcome constraints wherever possible, whilst ensuring against detrimental town-cramming or unacceptable impacts on the planned character of the existing neighbourhoods or on residential amenity.

Proposals that result in a net loss of dwellings will be resisted.

All reasonable opportunities will be considered including: brownfield sites; surplus green space; town centre living; and opportunities on the edge of Crawley, where these are consistent with the other policies and proposals in this Local Plan and the principle of sustainable development.

The Local Plan makes provision for the development of a minimum of 5,320 net dwellings in the borough in the period 2021 to 2037<sup>100</sup>.

This minimum requirement will be broken down into an annual average requirement on a stepped basis as follows:

- Years 1-5 (2021-26): 350 dwellings per annum (dpa)
- Years 6-10 (2026-31): 450dpa
- Years 11-16 (2031-37): 220dpa.

After this supply is deducted from the identified housing need of 12,000 over the period 2021-37, there will be a remaining unmet housing need, of approximately 6,680 dwellings, arising from Crawley over the Plan period. This will arise as follows:

- Years 1-5 (2021-26): 400dpa
- Years 6-10 (2026-31): 300dpa
- Years 11-16 (2031-37): 530dpa

The council will continue to work closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this need in sustainable locations. This will include continued assessment of potential urban extensions to Crawley.

### **Reasoned Justification**

12.36 *The housing figure identified in Policy H1 represents a 'supply-led' requirement, and reflects the compact nature of the borough, its limited land availability and significant environmental, potential airport expansion and noise constraints.*

12.37 *The majority of housing delivery (against the borough's housing requirement) will take place in the Years 1–10 of the Plan period, beyond which capacity, and therefore identified delivery, is expected to be significantly lower (as illustrated in the Housing Trajectory). This is primarily due to the development of Crawley's new neighbourhood of up to 1,900 dwellings, Forge Wood, which forms a major part of housing delivery in the first ten years of the Plan period and is the last remaining large area of relatively unconstrained land in the borough (1,038 dwellings of which remained outstanding as of April 2020). The varied nature of housing land supply (and associated housing delivery) over the Plan period makes it difficult to identify an annual housing delivery target within Policy H1. However, whilst an annualised average delivery of 332.5 dwellings per annum is anticipated, a stepped trajectory is reflected in the Policy to account for the higher delivery in the early and middle part of*

<sup>100</sup> This includes the additional 10% buffer within Years 1-5 as required by paragraph 73 of the National Planning Policy Framework (2019) as detailed in the council's Housing Trajectory, 1 September 2020

*the Plan period and the lower anticipated levels towards the end. On this basis, monitoring of the housing delivery within the borough will reflect the planned approach taken, rather than suggesting “over delivery” followed by “under delivery”.*

- 12.38 *The council has endeavoured to ensure that every opportunity for residential development within the borough has been fully considered through the Local Plan process. Additional sites were proposed through the council’s “Call for Sites” and the council’s Strategic Housing Land Availability Assessment has been updated following the early engagement consultation. All sites have been reassessed to consider those which are considered to be suitable for development and either ‘deliverable’ in Years 1–5 or ‘developable’ in Years 6–10 or 11–16, and density levels of allocated sites have been reassessed in light of Policy CL4 and the council’s commitment to making effective use of land. The SHLAA also identifies a number of sites which are considered suitable for residential development but unlikely to come forward due to factors such as ownership and viability, and these sites cannot reasonably be expected to count towards housing land supply. However, the council will continue to work proactively with landowners to address the key barriers to bringing these sites forward. The supply figure should therefore be considered as a minimum.*
- 12.39 *The constrained nature of Crawley’s land supply means that approximately 44% of the borough’s predicted housing need over the 16 years 2021 – 2037 can be met within the borough boundaries. The remaining unmet housing need from Crawley, of 6,680<sup>101</sup>, will need to be considered through Duty to Cooperate discussions as part of the Local Plan Reviews for the other authorities within the Housing Market Area (primarily Horsham and Mid Sussex along with a small part of Reigate and Banstead, particularly an overlap with Horley). Currently, the adopted Local Plans for Horsham and Mid Sussex districts are anticipated to provide an additional 3,000 dwellings<sup>102</sup>, above their objectively assessed housing needs, in order to meet Crawley’s unmet need. However, through the Local Plan Reviews this figure is likely to change, particularly as the Standard Method increases their own housing requirements to above their current adopted Plan commitments (see paragraph 2.28).*
- 12.40 *Opportunities for urban extensions immediately adjoining Crawley’s borough boundaries will continue to be explored with Crawley’s neighbouring authorities, taking into account the issues set out in paragraphs 12.17-12.23 above. Efforts will be made to include affordable housing provision to meet Crawley’s needs outside of the borough, wherever possible, particularly if these are close to the borough boundary.*

#### Housing Monitoring and Delivery

- 12.41 *Housing delivery will be continually monitored and reported at least annually through the Authority’s Monitoring Report. Delivery will be assessed against the expectations of the Local Plan Housing Trajectory, and against the annually updated Housing Trajectory. The council will also be monitored through the government’s national Housing Delivery Test. This will be based on the annualised average housing target set by the Local Plan (where the Plan remains up-to-date) over a preceding rolling three-year period. As the anticipated higher delivery in the first part of the Plan period would not be considered as part of the Housing Delivery Test towards the end of the Plan period, a stepped target is established in Policy H1, to ensure the borough is measured against the realistic position of a constrained and reducing land supply.*

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<sup>101</sup> 12,000 dwellings housing need (Standard Method 750 x 16 years) – 5,320 dwellings total supply 2021 – 2037 (CBC Housing Trajectory, September 2020) = 6,680 dwellings unmet need

<sup>102</sup> 1,500 dwellings to be provided in Mid Sussex district (between April 2024 and March 2031: Policies DP4 and DP5, Mid Sussex District Plan 2014 – 2031, 2018) and 1,500 dwellings to be provided in Horsham district (between April 2021 and March 2031, Horsham District Planning Framework, 2015)

- 12.42 *Whilst the scope for the council to deliver private development, once planning permission is granted, is limited, the council has a history of intervening and supporting delivery of stalled development. In addition, the council has a robust own-build programme. Should delivery rates fall below 95% of the housing requirement, through the Housing Delivery Test, the council will be required to prepare an Action Plan. This will assess the causes of under-delivery and identify actions to increase delivery in future years. However, even where delivery is exceeding or meeting the Housing Delivery Test, as part of the council's monitoring the implementation of policies, the progress of key development sites identified by the Plan will be assessed and, where these are not coming forward in line with the anticipated Housing Trajectory timescales or delivery rates, the council will seek to identify the causes and whether there is scope for support or intervention.*
- 12.43 *However, early delivery will not override the need for a scheme to be policy compliant and meet the expectations of the Local Plan as a whole for good design and high quality schemes. Furthermore, the limited land supply of the borough makes on-site affordable housing delivery imperative, and viability claims suggesting this is slowing delivery will not automatically result in a reduction of the council's expectations for this to be provided.*

### **Key Housing Sites**

- 12.44 New housing is considered integral to the creation of sustainable neighbourhoods in Crawley. The council will ensure that new housing opportunities are identified according to both land availability and the characteristics of individual neighbourhoods. This approach will respect the town's unique neighbourhood development and design principles and preserve the most valued of the town's environmental features such as open space and strategic landscaping.

#### **Policy H2: Key Housing Sites**

The following sites are identified as key housing sites and allocated on the Local Plan Map. These are considered to be critical to the delivery of future housing in Crawley and are identified as being 'deliverable' within the first five years of the Plan (2021/22 – 2025/26) or 'developable' in years 6–16 (2026/27 – 2036/37)<sup>103</sup>. To ensure the delivery of the overall minimum housing figure set out in Policy H1, as supported by the Housing Trajectory, indicative capacity figures for each site are shown in brackets below.

##### **Deliverable**

- Forge Wood Masterplan Area, Pound Hill (1,083 dwellings outstanding in April 2020)
- Zurich House, East Park, Southgate (53 dwellings)
- Former TSB site, Russell Way, Three Bridges (90 dwellings)
- Upper Floors, 7 – 13 The Broadway & 1 - 3 Queens Square, Northgate (25 dwellings)
- Land Adjacent to Sutherland House, Russell Way, Three Bridges (30 dwellings)
- Shaw House, Pegler Way, West Green (33 dwellings)
- Longley House, Southgate (100 dwellings)

##### **Developable**

- Land at Steers Lane, Forge Wood (185 dwellings) (subject to implementation of outline planning permission of CR/2018/0894/OUT, or any amendment thereof, and associated Reserved Matters approval(s))
- Land adjacent to Desmond Anderson, Tilgate (150 dwellings)
- Land to the southeast of Heathy Farm, Balcombe Road, Forge Wood (150 dwellings)

<sup>103</sup> Crawley Borough Council Housing Trajectory, 31 December 2019

#### Housing and Neighbourhood Facilities Site

- The Imperial, Broadfield Barton (deliverable), 19 dwellings. Development of this site must include a drinking establishment (A4 use) and two retail (A1 use) units.

#### Town Centre Key Opportunity Sites (1,500 net dwellings); comprising:

- Telford Place, Three Bridges (deliverable)
- Crawley Station and Car Parks (deliverable)
- County Buildings (developable)
- Land North of the Boulevard (deliverable/developable)
- Crawley College (developable)
- Cross Keys (developable)
- MOKA (deliverable)

#### Housing and Open Space Sites

- Tinsley Lane, Three Bridges (deliverable) 120 dwellings, mixed use recreation/residential. Development of this site must include:
  - i. the replacement of Oakwood Football Club;
  - ii. senior football pitch and facilities;
  - iii. a junior 3G football pitch;
  - iv. community use arrangements for the sports pitch facilities;
  - v. enhancement and management for public access of Summersvere Woods;
  - vi. on-site publicly accessible play space and amenity greenspace;
  - vii. the provision of allotments.

Development must also be carefully planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent safeguarded minerals site.

Full details of the requirements relating to this site are set out in the Tinsley Lane Development Brief.

- Breezehurst Drive Playing Fields, Bewbush (deliverable) 65 dwellings, mixed use recreation/residential. Development of this site must include:
  - i. the retention of good quality pitch provision to the south of the pavilion;
  - ii. provision of enhanced pitch drainage off-site;
  - iii. new or retained provision of changing facilities to be directed towards Skelmersdale Walk Playing Fields or other suitably located provision to meet future fluctuations in demand for pitch sports;
  - iv. the provision of allotments.

These requirements are set out in full in the Breezehurst Drive Playing Fields Development Brief.

- Henty Close, Bewbush (deliverable) 24 dwellings. Development of this site must:
  - i. provide a replacement play area of equivalent or better quantity and quality in a suitable location.
- Rushetts Road Play Area, Langley Green (developable) 14 dwellings. Development of this site must:
  - i. provide a replacement play area of equivalent or better quantity and quality in a suitable location.

#### Housing, Biodiversity and Heritage Site

- Land east of Balcombe Road/Street Hill, Pound Hill (deliverable) 15 dwellings. The design and layout of the development of this site must:
  - i. respect its setting outside the built up area and the rural character of the Worth Conservation Area;

- ii. concentrate the residential element and associated infrastructure towards the least sensitive areas, where possible, and to be located within the southern section of the housing, biodiversity and heritage site;
- iii. reflect, enhance and ensure no significant harm to the locally designated historic parkland;
- iv. allow a suitable unbuilt margin around the archaeologically sensitive Moat;
- v. avoid harm to the species-rich meadow grassland which contributes to the Local Wildlife Sites (LWS);
- vi. maintain the woodland vegetation buffer between the development and the church, to retain the historic significance of the context of Worth Church; and
- vii. be accompanied by a long-term commitment to the ecological enhancement and positive management of the remainder of the LWS (excluding the ponds and woodland in the centre and north-east in separate ownership) for the benefit of biodiversity.

Detailed and up-to-date ecological and archaeological assessments must be carried out. Where impacts cannot be avoided adequate mitigation and compensation measures will be provided to offset any harm caused to the site's important assets.

These requirements will be set out in full in a Development Brief.

#### Housing for Older People and those with Disabilities

- Oakhurst Grange, Southgate (developable) 55 dwellings as residential Class C3 use for older people or up to 120 residential rooms as Class C2 (Residential Home) use.
- St. Catherine's Hospice (developable) as residential Class C3 use for older people (60 dwellings) and/or residential rooms as Class C2 (Residential Home) use.

Development of each of these sites should specifically meet the needs of older people, either as a care facility in the form of Extra-Care or Residential Care or to provide general housing designed to meet particular needs of older people and those with disabilities, including being wheelchair adapted dwellings meeting Building Regulations Part M, Category 3 accessibility standards.

#### Broad Locations

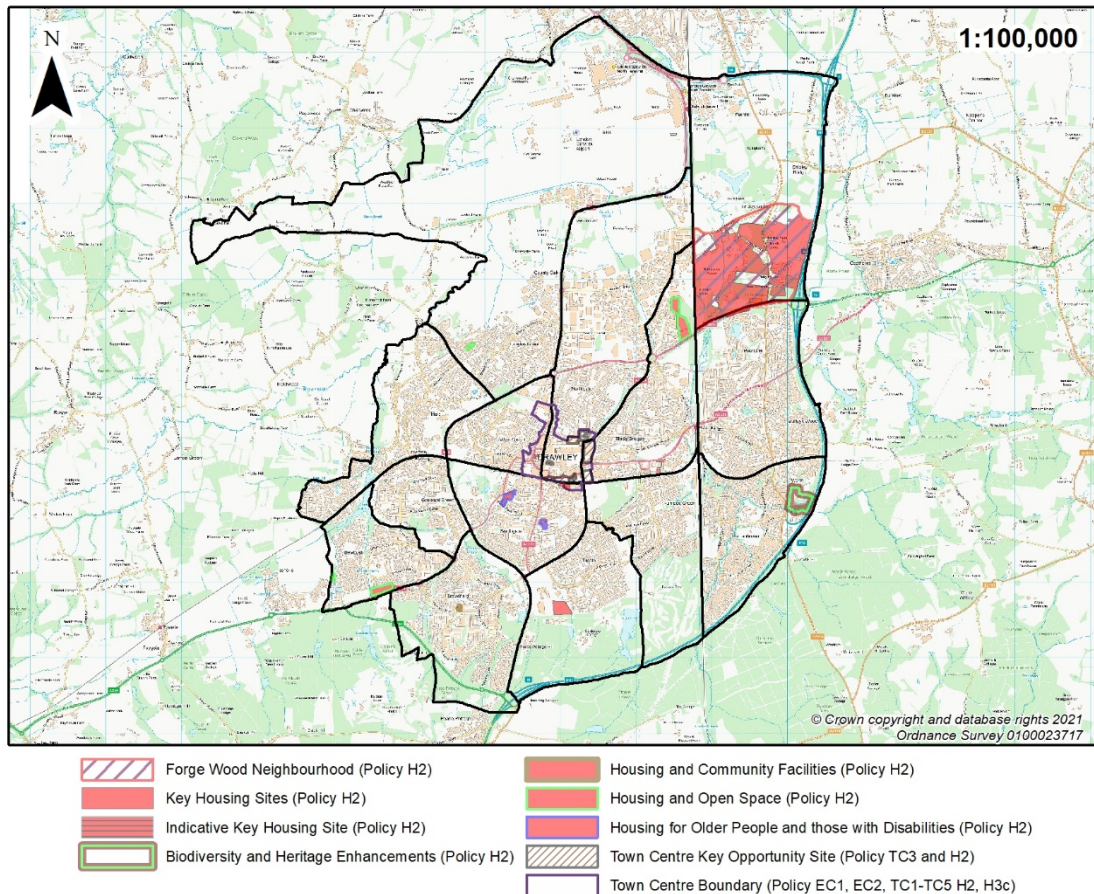
The remainder of the land within the Town Centre Boundary outside the identified Town Centre Key Opportunity Sites (above), and Land East of London Road, Northgate are identified as broad locations for housing development in years 6–10 and 11–15 with the capacity to deliver a minimum of 112 and 84 net dwellings respectively.

### **Reasoned Justification**

12.45 *This Policy demonstrates how the Local Plan makes provision for the delivery of a minimum of 5,320 net additional dwellings in the borough between 2021 and 2037. This includes the 10% additional buffer required within the first five years of the Plan to ensure greater competition and choice in the supply of housing land. The council has undertaken a Strategic Housing Land Availability Assessment (SHLAA) which identifies land that has the potential for residential development in the borough. The results of the SHLAA are used to demonstrate an annual five-year housing land supply and to identify sites that are likely to come forward for residential development over the lifetime of the Local Plan.*

12.46 *Through the SHLAA process, the council has been able to identify a number of deliverable and developable sites to meet the housing target for the Local Plan period. In this regard, the council can demonstrate that it can satisfy the government's requirement to identify specific 'deliverable' sites to meet the first five years housing supply and specific 'developable' sites or broad locations for years 6–10 and 11-16. It is considered that the additional 10% buffer requirement is capable of being delivered in the period 2021/22 – 2025/26.*





### Forge Wood

- 12.47 *The new neighbourhood of Forge Wood is currently under construction. A large proportion of the area allocated on the Local Plan Map benefits from outline planning permission and an approved masterplan. This is bringing forward up to 1,900 new dwellings in addition to a new neighbourhood centre, employment land and social facilities including a primary school and formal areas of public open space and sports pitches. The outstanding 1,038 dwellings are anticipated by the Housing Trajectory to be delivered within the Plan period; to be completed by 2030/31.*
- 12.48 *A further developable housing site is identified outside the Master Plan area, at Heathy Farm (in the south-east corner of the allocation). The site is located close to Crawley Avenue (A2011), M23 and Junction 10. This site is formed of two parcels of land, which are joined by a woodland area. Much of the woodland area is ancient woodland. Therefore, this site is constrained by noise levels and an ecological buffer zone associated with the ancient woodland, which must be determined by the appropriate surveys. In addition, the site is also likely to need to incorporate on-site open space, including allotment provision, which should be designed into a scheme from the outset to ensure its satisfactory accommodation.*
- 12.49 *Land at Steers Lane forms a further site which has historically been identified as residual land for residential development at Forge Wood. Outline planning permission for up to 185 dwellings with supporting access, parking, landscaping and open space on this site was granted on appeal in February 2020 (CR/2018/0894/OUT), and this provides a basis for the bringing forward of the site. At the same time it is noted that this application was assessed against the 2015 Local Plan, and any review of the principle of the acceptability of the site through a new planning application would need to be considered against the policies in this plan, including Policy EP4: Development and Noise.*

12.50 *Beyond this, there may be opportunities within the masterplan area to consider further smaller-scale housing development, as infill opportunities, subject to considerations of infrastructure capacity, open space and amenity requirements, biodiversity and ancient woodland, and the requirements of Policy EP4 relating to noise affected areas. Development of residential uses in land affected by the noise contours<sup>104</sup> above 60dB would not be in accordance with Policy EP4 and would be refused.*

#### Town Centre Housing Sites

12.51 *A number of sites within the Town Centre boundary have been identified as Key Opportunity Sites in Policy H2 and TC3. These sites have the capacity to deliver a minimum of 1,500 net dwellings cumulatively through mixed-use main town centre uses and residential development. Proposals for mixed-use (including non-residential) development on these sites will be considered favourably providing they can demonstrate the delivery of wider vitality and viability benefits to the Town Centre, and that their development would not undermine the delivery of a minimum of 1,500 net dwellings in the period 2020/21 to 2035/37 and support delivery of the overall minimum housing figure set out in Policy H1 (in accordance with Policy TC3). The council's delivery against these targets will be subject to ongoing monitoring and identified in the Authority's Monitoring Report. Residential proposals coming forward within the Town Centre boundary must also adhere to the location-specific requirements set out in Policies TC4: Active Frontages and H3d: Housing Typologies Town Centre Residential Sites, in addition to satisfying the other general policies in the Plan.*

#### Housing and Open Space Sites

12.52 *In determining how far Crawley can meet its own housing needs, detailed assessments have been carried out to ensure the town balances competing land uses in a sustainable manner. This includes landscape character assessments, open space and economic growth assessments alongside the Urban Capacity Study and Strategic Housing Land Availability Assessments. Four sites have been identified and allocated on the Local Plan Map for 'Housing and Open Space'. These are Tinsley Lane, Three Bridges (Developable), Breezehurst Drive, Bewbush (Deliverable), Henty Close, Bewbush (Developable) and Rushetts Road, Langley Green (Developable). The layout of these sites has been considered in more detail to ensure they can deliver the quantum of housing within the constraints identified by the open space study for meeting recreational open space needs<sup>105</sup>. A development brief has been prepared for two of these sites (Tinsley Lane and Breezehurst Drive) to ensure their development adheres to the requirements of the Open Space, Sport and Recreation Study and Playing Pitch Study (2014); critical elements of these are set out in the Policy<sup>106</sup>.*

12.53 *Tinsley Lane is located in close proximity to Crawley Goods Yard which is a safeguarded minerals site. Development must be carefully planned, laid out and designed to minimise potential future conflicts and constraints on its important minerals function.*

12.54 *A small housing site to the west of Henty Close could enable improved linkages and enhanced urban design and principles of designing out crime, into the new Kilnwood Vale neighbourhood at the point of the proposed bus, pedestrian and cycle connection. This would result in the need to replace the loss of a small play area, but*

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<sup>104</sup> As associated with an additional runway to the south of Gatwick Airport unless otherwise determined.

<sup>105</sup> In accordance with paragraphs 96 and 97 of National Planning Policy Framework (2019) MHCLG

<sup>106</sup> [Tinsley Lane Development Brief \(April 2017\)](#) and [Breezehurst Drive Playing Fields Development Brief](#).

would include the retention of the two sports pitches and a pavilion associated with the playing fields.

- 12.55 *Rushetts Road Play Area will also need to provide a replacement play area of better quality either within the site's layout or in an alternative suitable location in order to meet the access to play facilities needs for this area of Langley Green. The design and layout should enhance and improve this site without creating significant harm on the amenity of adjoining properties.*

#### Housing, Biodiversity and Heritage Site

- 12.56 *Land east of Balcombe Road/Street Hill has a number of heritage and environmental constraints which must be carefully considered and addressed through the design and layout of a development scheme. These include (but are not limited to):*
- i. Forming part of the historic countryside setting of the Grade I listed Church;*
  - ii. Its allocation within the Worth Conservation Area;*
  - iii. Its Local Wildlife Site designation (with species-rich meadow grassland as its important ecological attribute);*
  - iv. Containing an archaeological sensitive asset: the Moat;*
  - v. Forming part of an Historic Park and Garden;*
  - vi. Being located outside the Built-Up Area Boundary of the town.*
- 12.57 *To ensure an appropriate balance between the need for housing and the important heritage and environmental assets and characteristics of the site, a maximum capacity of 15 dwellings is considered likely to be appropriate, subject to careful layout and design which clearly addresses the constraints associated with the site, including those covered by other policies in this Local Plan and national legislation and policy, and which result in a high quality, sensitive scheme. The maximum capacity figure should not be considered a "target" at the expense of meeting policy and design expectations.*
- 12.58 *Harm to the character of the Worth Conservation Area must be minimised by a scale and design of development which respects the rural nature of the Conservation Area, as a loose-knit low density layout clearly distinct from the suburban character of Maidenbower. The potential impact of the development and long-term degradation of the valuable habitat on the site and the harm to the Moat can be mitigated against through the appropriate high quality enhancement of the remainder of the site. Therefore, an unbuilt margin around the archaeological asset and its appropriate management must be retained and an appropriate scheme for its future management, and that of the two-thirds of the LWS not affected by development and controlled by the landowner, will be required as part of the development. To protect the valuable nature of the site, measures must be incorporated within the development, and management proposals, to control the pressures created from the development on the remaining ecological assets, including informal recreation, dog walking and fly tipping.*
- 12.59 *Due to the complex character and assets associated with this site, it is shown on the Local Plan Map as a housing, biodiversity and heritage site, with the area most likely to be suitable for housing indicated within the southern part of the site.*

#### Housing for Older People and those with Disabilities Sites

- 12.60 *It can be difficult for developers of specialist housing for older people to compete with other developers for land, particularly in a land constrained borough such as Crawley. To support the delivery of specialist accommodation, and to seek to provide a greater number of affordable units within the borough in order to meet the growing needs of the aging population, the Local Plan has allocated two sites for specialist housing for older persons and/or Extra Care Housing for all ages.*



- 12.61 *Oakhurst Grange is a vacant site formerly occupied by a residential care facility. As a secluded and discrete site, the particular characteristics of the site and its location in close proximity to Crawley Hospital support its continued contribution towards meeting the local housing needs of older people. Appropriate development of this site could be as an Extra-Care or Residential Care facility; or as a bespoke development which may incorporate mixed units designed to meet the needs of older people; or for housing designed to provide more general accommodation for older people, and to contribute to the overarching principle of places to live that assist older people to retain their independence for as long as possible. This may include: accessible mainstream housing such as bungalows and step-free apartments designed and built to wheelchair adaptable access standards; sheltered or extra care housing; and/or retirement housing.*
- 12.62 *The existing St. Catherine's Hospice site is to become vacant following the move to a new facility in Pease Pottage. This site offers the council and St. Catherine's Hospice the opportunity to identify a further site for older people's housing and/or residential care home. The site's location and constraints including its size, changes in levels and location adjacent to a Conservation Area make it particularly appropriate for this type of housing.*

#### Broad Location Housing Sites

- 12.63 *Given that the council is required to identify 16 years housing supply, it is considered that there is additional housing potential in the Town Centre and Land East of London Road that will arise in the mid to latter part of the Plan period. These could contribute to housing land supply from Year 6 onwards (i.e. from 2026/27 to 2036/37) and are identified as broad locations for medium to long-term residential development. This is in accordance with the overall spatial approach as set out in the Local Plan Vision to 2037, by helping to minimise the impact on important biodiversity and landscape features and offers the greatest scope to reduce the need to travel by private vehicle because of the proximity to existing services, jobs and public transport.*

### **Housing Typologies**

- 12.64 In order to support Local Plan Policy H1 and seeking to maximise the delivery of new dwellings to meet as far as possible Crawley's emerging housing needs, the following land typologies have been identified for their potential suitability for housing development:

- Estate Regeneration;
- Densification;
- Infill opportunities;
- Small sites;
- Town centre;
- Upward extensions;
- Conversions from commercial/non-residential uses;
- Open spaces;
- Garden sites;
- Urban Extensions on/outside the borough boundaries (covered in paragraphs 2.30-2.33 and 12.17-12.23, along with Policy CL8, above).

### **Policy H3: Housing Typologies**

Housing development in Crawley will be supported where it meets the following criteria, along with the specific requirements set out associated with each of the housing typology sub-policies below (H3a-H3f inclusive):

- i. The principles of Good Urban Design are followed;
- ii. The principles in relation to Local Character and Design are followed;
- iii. The presumption in favour of sustainable land use is followed;
- iv. Local Design Standards and wider borough standards in relation to landscape and urban form are followed;
- v. A good standard of amenity for all existing and future occupants of land and buildings is provided or retained, including maintaining privacy and preventing overlooking; and avoiding dominance or overshadowing.
- vi. The scheme would not result in an unacceptable impact on car parking for existing and new residents and occupiers.
- vii. The scheme meets the internal and external space standards expected by the Local Plan, including being accessible and adaptable, and proposals ensure that rooms within buildings receive adequate daylight.

### **Reasoned Justification**

- 12.65 *The Plan's windfall allowance recognises that opportunities exist within the borough for residential schemes to come forward on sites not currently identified in the Housing Trajectory and, therefore, unable to be allocated in Policy H2. To provide a positive and pro-active planning approach, Policies H3 and sub-Policies H3a-f offer the planning policy framework for such proposals to be considered against in relation to their location and land typology.*
- 12.66 *Where residential development is proposed outside of the Built-Up Area Boundary, it must address the general requirements set out in Policy CL8, as well as those which relate to the character area or edge in which the site is located.*

### **Estate Regeneration**

- 12.67 In Crawley, due to the planned Twentieth Century New Town history, a significant proportion of housing was provided at a similar time, between the 1950s and 1990s. This may mean that opportunities for estate regeneration could arise as part of the promotion of improvements to housing stock, particularly where the construction methods of certain types of properties are causing maintenance problems or have poor energy efficiency. It can be a successful way to improve the quality of housing and increase numbers in an area whilst at the same time improving the local environment, but is also potentially disruptive to existing residents. Therefore, this would need careful planning. Local Authorities are encouraged by the NPPF<sup>107</sup> to consider the social, economic and environmental (including improved sustainability) benefits of estate regeneration.
- 12.68 At this stage, there are no estate regeneration projects planned in Crawley. Should this approach be progressed ahead of the next Local Plan Review, there are a number of specific planning policy considerations to be taken into account in early scoping and design.

### **Policy H3a: Estate Regeneration**

Housing development as part of Estate Regeneration will be supported where this is in conformity with the other policies and requirements of this Local Plan, and where it can be shown that:

<sup>107</sup> National Planning Policy Framework, paragraph 93 (2019) MHCLG



- i. The proposals are supported by, and in conformity with, an agreed comprehensive Masterplan for the new and remaining areas, including detailed phasing and relocation proposals;
- ii. The proposals will provide high quality new development in keeping with the character of the neighbourhood, maximising the efficient use of land whilst protecting residential amenity and providing appropriate open space;
- iii. Local communities and affected individuals have been engaged extensively, positively and with genuine opportunities to participate and are supportive of the proposals.

### **Reasoned Justification**

12.69 *The policy is consistent with the requirement in the National Planning Policy Framework that planning policies 'should consider the social, economic and environmental benefits of estate regeneration' and that 'Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard'*<sup>108</sup>.

### **Densification, Infill Opportunities and Small Sites**

12.70 Within the urban neighbourhoods, opportunities for densification through infill and small sites may arise as part of the windfall housing delivery anticipated through the Housing Trajectory. The Policy below sets some general principles which should be considered alongside any Area-Wide Character and Design Assessments and local design standards associated with the location of any proposals.

#### **Policy H3b: Densification, Infill Opportunities and Small Sites**

Densification and development on infill and small sites in Crawley will be supported where it meets the criteria set out in Policy H3, and Policy CL2, along with the specific requirements set out below, and where it is in conformity with the other policies and requirements of this Local Plan.

#### **Densification**

Housing development through densification schemes will be supported where it can be shown that:

- i. The site is located in a sustainable location which would be appropriate for higher densities, such as close to transport interchanges, town centre and neighbourhood centres, as outlined in detail in Policies CL2 –CL4.

For large developments, with medium to high density ranges, applicants are particularly encouraged to deliver residential schemes which meet the amenity standards outlined in policy DD3, section i to v.

#### **Small Sites**

Housing development on small urban sites will be supported where it can be shown that:

- ii. It would not unduly restrict the development potential of adjoining land, nor prejudice the proper planning and phasing of development over a wider area;
- iii. It maximises the potential capacity of the site, taking on board the character of the site and its context, and uses the land efficiently, through a careful and high quality design-led approach appropriate to the character of the neighbourhood;
- iv. It is based on a thorough understanding of the immediate and wider context and is designed to respond to and enhance the existing character.

<sup>108</sup> National Planning Policy Framework, paragraph 93 (2019) MHCLG.

### **Infill Opportunities**

Housing development through infill opportunities will be supported where it can be shown that:

- v. It maximises the potential capacity of the site, taking on board the character of the site and its context, and uses the land efficiently, through a careful and high quality design-led approach;
- vi. It is based on a thorough understanding of the immediate and wider context and is designed to respond to and enhance the existing character.

### **Reasoned Justification**

12.71 *National planning guidance requires Local Planning Authorities to support development that makes efficient use of land. However, impacts on character and the importance of securing well-designed, attractive and healthy places must be considered<sup>109</sup>.*

### **Town Centre Residential Sites**

12.72 Although there is limited housing at present, the Town Centre represents a highly sustainable location for residential development with immediate access to facilities, services, and transport links. Residential development also adds vitality to the Town Centre, bringing life into the centre and supporting the evening economy. Therefore, housing development is encouraged in the Town Centre, either as mixed use or wholly residential schemes (where agreed) or as conversions of the upper floors of existing retail premises, particularly where these bring forward balanced tenures and owner-occupation in the Town Centre.

12.73 However, this must be balanced with the need to maintain sufficient floorspace for retail, commercial and social facilities and services which should be provided in a central location. In addition, the needs of the residential population must be adequately catered for, through sufficient infrastructure provision. Residential proposals within the Town Centre must comply with the policies set out in the Crawley Town Centre Chapter (Policies TC1 – TC4).

### **Policy H3c: Town Centre Sites**

Housing development in Crawley Town Centre, except at ground floor level within the Primary Shopping Area (Policy TC1) will be supported where it meets the criteria set out in H3, along with the specific requirements set out below, and where it is in conformity with the other policies and requirements of this Local Plan:

- i. It would not result in a net loss of employment or retail land or floorspace unless it otherwise clearly meets the full requirements of Policy EC2;
- ii. The scheme should provide active frontages on the ground floor level in accordance with Policy TC4;
- iii. The scheme should achieve the correct housing mix for the Town Centre, as set out in Policy H4, particularly preventing an over-supply of small dwellings, and should create a balance in tenure, including through encouraging owner-occupation, encouraging affordable tenures, and monitoring the ratio of private rented accommodation;
- iv. The development will be designed to be integrated effectively with existing businesses and community facilities and to adequately address existing and

<sup>109</sup> National Planning Policy Framework, paragraph 122 d) and e) (2019) MHCLG

potential noise and nuisance arising from the mix of town centre uses through suitable mitigation before the development is occupied;

- v. Cumulative infrastructure needs of the increasing residential population in the Town Centre are clearly identified and met, and the proposal has been justified and is adequately supported by sufficient social facilities and infrastructure located within the Town Centre or accessible from the development;
- vi. Where a lower car parking provision is anticipated, alternative transport proposals must be justified, agreed and implemented;
- vii. It maximises the potential capacity of the site and uses the land efficiently, through a careful and high quality design-led approach;
- viii. Cycle parking and waste/recycling storage must be adequately designed into the scheme from the start and the site will meet the requirements necessary for access, circulation and manoeuvring, loading and unloading and the collection of waste/recycling, including the servicing requirements of existing and new commercial and retail floorspace.

### **Reasoned Justification**

12.74 *Policies contained within the Town Centre chapter are particularly relevant when considering residential opportunities within the Town Centre Boundary. In addition, Policies CL3 and CL4 set out policy expectations in relation to the effective use of land. The Urban Design and Town Centre SPDs also provide additional supporting guidance which should be considered when preparing schemes.*

12.75 *Policy H4 sets out the expected future housing mix from developments across the borough. However, it is recognised that the Town Centre provides a different offer to the overall requirements. Notwithstanding this, evidence<sup>110</sup> has identified concerns regarding the over-provision of smaller bedsit and one bed units coming forward in Town Centre schemes leading to a distorted market without sufficient provision of family-sized units. As the Town Centre residential population grows, it is essential to cater for a better mix of communities to also cater for small families (two-bed units) as well as larger families (three- and four-bed units). On this basis, schemes within the Town Centre Boundary should seek to meet the Town Centre housing mix. Justification will be required for a housing mix which significantly differs from that modelled. Schemes which provide only the small units will not be considered acceptable on the basis of arguments which do not accept a need for a mix of units in Town Centre.*

### **Upward Extensions**

12.76 National policy encourages Local Planning Authorities to support opportunities to use the airspace above existing residential and commercial premises for new homes, where these would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, are well designed, and can maintain safe access and egress for occupiers. Certain upward extensions are now permitted development but, as much of Crawley lies within 3km of an aerodrome, many will still require planning permission.

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<sup>110</sup> Market Housing Mix, paras 5.17-5.19, page 47 (November 2016) Chilmark Consulting: <https://crawley.gov.uk/sites/default/files/documents/PUB311637.pdf> and the Strategic Housing Market Assessment (November 2019) Icen Projects: <https://crawley.gov.uk/sites/default/files/documents/PUB354604.pdf>

### Policy H3d: Upward Extensions

Housing development through upward extensions will be supported where it meets the criteria set out in Policy H3 and is in conformity with the other policies and requirements of this Local Plan, and where it can be shown that:

- i. The proposed height, including construction cranes, has been agreed with Gatwick Airport Ltd in relation to aerodrome safeguarding and NATS En Route LTD in relation to technical sites safeguarding;
- ii. It is based on a thorough understanding of the immediate and wider context and is designed to respond to and enhance the existing character, and take into consideration the expectations set out in Policy CL2;
- iii. It would not unduly restrict the development potential of adjoining land, nor prejudice the proper planning and phasing of development over a wider area;
- iv. It would not cause unreasonable harm to the amenity of the surrounding area by way of overshadowing, dominance or overlooking;
- v. Where a lower car parking provision is anticipated, alternative transport proposals are justified, agreed and implemented;
- vi. The development will be designed to be integrated effectively with existing businesses and community facilities and adequately address existing and potential noise and nuisance arising from the adjoining uses through suitable mitigation before the development is occupied;
- vii. Cycle parking and waste/recycling storage are adequately designed into the scheme from the start and the site will meet the requirements necessary for access, circulation and manoeuvring, loading and unloading and the collection of waste/recycling.

#### **Reasoned Justification**

12.77 *Crawley neighbourhoods are predominantly characterised by low-rise, domestic scale developments, of two and sometimes three-storeys. In such cases, clear guidance will be provided by the Area-Wide Design Assessments. For Crawley Town Centre there may be more scope for upward extensions, where this is well-designed.*

12.78 *For any developments proposing an increase in height, liaison with Gatwick Airport Limited, with respect to Aerodrome Safeguarding (see Policy DD5) will be essential at an early stage. This will include consideration of height of cranes and construction.*

#### **Conversions from Commercial/Non-Residential Uses**

12.79 National planning policy encourages the conversion of commercial properties, especially vacant or underused buildings, to residential. Commercial properties within Crawley's Main Employment Areas are not considered suitable for residential, due to the need for employment floorspace and the impacts of residential developments on commercial operations in such locations. However, the town centre may provide opportunities for some conversions to residential where this has been considered against the Policy requirements of EC1 and EC2.

### Policy H3e: Conversions from Commercial/Non-Residential Uses

Housing development through conversion of existing buildings from non-residential uses will be supported where it meets the criteria set out in Policy H3 and is in conformity with the other policies and requirements of this Local Plan, and where it can be shown that:

- i. It would not result in a net loss of employment or retail land or floorspace, unless it clearly meets the requirements of Policy EC2;
- ii. Where this is located adjacent to one of the borough's Main Employment Areas, the scheme would not result in an adverse impact on the economic role or function of the Main Employment Area, and the wider economic function of Crawley;
- iii. Where this is located within one of the borough's Neighbourhood Parades, the scheme would not adversely affect the ability of the Neighbourhood Parade to cater for the day-to-day needs of local residents;
- iv. The scheme provides active frontages at ground floor level, where the site is within the town centre or appropriate other locations;
- v. The development will be designed to be integrated effectively with existing businesses and community facilities and adequately address existing and potential noise and nuisance arising from the mix of uses through suitable mitigation before the development is occupied;
- vi. Cycle parking and waste/recycling storage will be adequately designed into the scheme from the start and the site will meet the requirements necessary for access, circulation and manoeuvring, loading and unloading and the collection of waste/recycling. Where a lower car parking provision is anticipated, alternative proposals must be justified, agreed and implemented;
- vii. It maximises the potential capacity of the site and uses the land efficiently, through a careful and high quality design-led approach;
- viii. It is based on a thorough understanding of the immediate and wider context and is designed to respond to and enhance the existing character.

### **Reasoned Justification**

12.80 *Conversions can increase the supply of residential properties but it is important to ensure no conflicts arise by introducing a residential population into a commercial area. Policies in the Economic Growth and Crawley Town Centre chapters apply.*

### **Open Spaces**

12.81 Where open space can be shown to be surplus to open space requirements or sufficient alternative new provision is to be provided, in accordance with Policy OS1, the following specific criteria must be satisfied in considering new housing development on existing open space sites (including residential garden sites). Where an improvement on quality, usage and surveillance would be achieved through design and layout of new development this will be positively considered.

### **Policy H3f: Open Spaces**

Housing development on surplus open spaces within the Built-Up Area Boundary in Crawley will be supported where it meets the criteria in Policy H3, along with the specific requirements set out below, and where it is in conformity with the other policies and requirements of this Local Plan.

#### **Open Spaces**

Housing development on open spaces will be supported where it can be shown that:

- i. The site has been shown to be surplus to requirements for open space needs through the Open Space, Sport and Recreation Study or otherwise clearly meets the requirements established by Policy OS1;



- ii. Replacement and/or enhancement of open space is provided elsewhere in a suitable location to mitigate against the loss of the open space and to address the increased demand arising from the associated new population;
- iii. The urban and landscape character and environmental values of the site are outweighed by the benefits of the development and any harm mitigated and addressed, with an enhancement, through design and layout;
- iv. Mitigation measures would ensure that the scheme would not block or harm the strategic Green Infrastructure network and would be designed to provide new links to Green Infrastructure where possible and clearly result in Net Gain for biodiversity (based on up-to-date and professional ecological and arboricultural surveys);
- v. Flood risk will not be exacerbated elsewhere as a result of the development, and surface water drainage is maintained at greenfield runoff rate levels, as a minimum.

### **Garden Sites**

Housing development on garden sites will be supported where it can be shown that:

- vi. It is based on a thorough understanding of the immediate and wider context and is designed to respond to and enhance the existing character;
- vii. Ancient woodland or aged trees would not be damaged or lost and an appropriate buffer is provided between any such trees and the edge of the development's construction. Any TPO protected trees should be retained where possible and measures to avoid damage and root compaction should be implemented.

### **Reasoned Justification**

12.82 *Policies set out in the Wellbeing and Communities (Character, Landscape and Development Form; Design and Development Requirements; and Open Space, Sport and Recreation) and Environmental Sustainability (Green Infrastructure and Biodiversity and Environmental Protection) Sections are particularly relevant when considering applications in relation to housing on existing open space sites. In relation to flooding, Policy EP1 will apply to development of open spaces. Wherever possible, further reduction of surface water runoff beyond the greenfield runoff rate levels, and additional storage introduced as part of any development proposal, should be sought in order to offer a greater reduction in runoff rates from new development.*

## Meeting Housing Needs

- 13.1 Crawley provides a critical role in the Northern West Sussex Housing Market Area (comprising Crawley Borough, Horsham and Mid Sussex Districts and a small part of Reigate and Banstead Borough) offering a substantial stock of affordable, well-designed, family accommodation. In comparison to the other districts within the Housing Market Area, Crawley has a housing mix skewed towards smaller and cheaper housing, but with a high proportion of three-bedroom terrace properties built as a key component of the New Town housing stock. It also has higher levels of social tenure accommodation, made available to those unable to access private housing (rental or purchase), in contrast to other parts of the Housing Market Area.

### Chapter Content

- 13.2 This chapter establishes the policies to secure the appropriate type and mix of residential development within the borough to meet the needs of specific groups in the community and sets policies to support the delivery of the types of housing needed within the borough.

### The Key Issues

#### Existing Housing:

- 13.3 There are approximately 46,000 dwellings in Crawley. 60% of the town's housing is owner-occupied with 24% being affordable properties (social rent or affordable rent or part ownership). The number of people living in privately rented accommodation has increased significantly, and accounted for over 15% of households in 2011 compared with 6% in 2001. Almost 97% of the affordable housing stock is rented, with the remainder being part-owned (shared-ownership or shared-equity). Terraced housing makes up the largest share of the stock (42%), with the rest comprising flats (23%), semi-detached (21%) and detached housing (14%).
- 13.4 Overall, the housing stock appears well suited to younger working people (single households and those with young families) seeking to enter the housing market, but the supply of larger housing and high-end market housing is more limited.

#### Northern West Sussex Strategic Housing Market Assessment:

- 13.5 The Northern West Sussex Strategic Housing Market Assessment (SHMA) has recently been updated. The updated study takes into account the latest data (including the Standard Method for calculating housing needs) and the latest national policy in relation to Crawley borough and Horsham district. It has assessed local housing needs and identifies the needs of particular groups within the population including:

- Those who require affordable housing;
- Families with children;
- Older people;
- Students;
- People with disabilities;
- Service families;
- People who rent their homes; and
- People wishing to commission or build their own homes.

Key messages and detailed evidence from this study have been taken on board through the policies in this Plan. The need for specialist housing for older people is covered in paragraphs 12.24-12.32 above, along with specific allocations in Policy

H2: Key Housing Sites (Housing for Older People) and supporting text in 12.60-12.62.

### **Gypsy, Traveller and Travelling Showpeople:**

- 13.6 The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2013) identified a need to find a reserve site suitable for accommodating ten Gypsy and Traveller pitches to meet potential accommodation needs arising from the existing community currently living within Crawley over the whole Plan period.
- 13.7 The assessment identified approximately 30 Gypsy, Traveller and Travelling Showpeople households living within Crawley; with 77 individuals identifying themselves as a 'White Gypsy or Irish Traveller' within the 2011 Census.
- 13.8 The completed questionnaires identified a demand for pitches, particularly through:
- the aspiration for Gypsy and Traveller children to live on a pitch;
  - desire to move out of their current bricks and mortar accommodation owing to preference; and
  - the anticipation of new family formations expected to arise from the existing households within Crawley.
- 13.9 It is considered that none of the participants in bricks and mortar accommodation demonstrated an immediate 'need' in terms of having a proven psychological aversion to bricks and mortar accommodation. However, a growth rate of 3% has been applied to the number of households currently living within Crawley for the purposes of estimating the potential future need which may arise from the current population over the Plan period (beyond the first five years). This resulted in a Local Plan need for a reserve site suitable for accommodating up to ten Gypsy and Traveller pitches. This Accommodation Needs Assessment has been reviewed in 2020, with the same conclusion being reached.
- 13.10 None of the surveyed Gypsy and Travellers indicated that they owned land which they wished to be considered for a Gypsy and Traveller site.
- 13.11 The borough is heavily constrained by its administrative boundaries, which in most parts of the borough do not extend significantly beyond the Built-Up Area. The presence of Gatwick Airport also renders a significant amount of land in the north of the borough unsuitable for residential development (particularly Gypsy and Traveller accommodation) due to noise constraints; and other areas of land are constrained by flood risk. These factors limit the opportunities for providing a suitable site for permanent caravan accommodation but a location for a possible reserve site has been identified.

## **Local Plan Policies**

### **Future Housing Mix**

- 13.12 Different households require different types and sizes of housing. It is important that an appropriate choice and mix of housing is provided across the borough in order to create balanced and sustainable communities. Widening housing choice broadens the appeal of an area and assists in meeting the needs of existing residents as well as attracting new residents to the borough. The council's Strategic Housing Market Assessment (SHMA) and its updates, provides the baseline evidence against which housing mix should be considered.

### **Strategic Policy H4: Future Housing Mix**

All housing development should provide a mix of dwelling types and sizes to address the nature of local housing needs and market demand. The appropriate mix of house types

and sizes for each site will depend upon the size and characteristics of the site and the viability of the scheme. However, consideration should be given to the evidence established in the Strategic Housing Market Assessment and its updates for market housing needs and demand in Crawley.

In delivering the affordable housing element of residential schemes, in line with Policy H5, the need for one, two and three bedroom affordable dwellings in Crawley, as identified in the council's Strategic Housing Market Assessment and its updates, should be addressed in meeting the housing needs of those considered to be in greatest need. These should include smaller dwellings designed to meet the needs of families.

The expected starting point for the market housing mix, both for schemes of owner occupation and private market rent, and the affordable housing mix is set out in the table below. Applications should explain how they have sought to meet this mix (or any subsequent delivery-adjusted update published with the council's Authority Monitoring Report) and provide strong justification for schemes which fail to provide a reasonable balance of property types and sizes, to promote mixed communities.

#### Housing Mix Test:

In order to avoid an excessively distorted dwelling mix, major residential developments will be required to meet the following test:

- Step 1: where applicable, divide the scheme into separate tenures.
- Step 2: for each tenure exceeding 4 units within the development, identify the 'median' size of unit on a notional development of equivalent tenure, scale and location whose mix matches that stated in the table below or any subsequent delivery-adjusted position published in the council's Authority Monitoring Report.
- Step 3: compare the notional median to the proposed scheme and ensure that neither the proportion of units smaller, nor the proportion of units larger than the notional median, exceeds 90%.

### **Reasoned Justification**

13.13 *Ensuring that new housing takes account of local need to create neighbourhoods where there is genuine choice of the right housing in terms of size, type, tenure, and affordability, both at neighbourhood and borough wide level, is essential. Therefore, the council will encourage a mix of housing that will be appropriate to the needs of the community taking account of the information within the SHMA and its updates, to provide a range of types, sizes, tenures and affordability including housing for the elderly, lifetime homes and other specialist housing needs.*

13.14 *The recommended mix across all priority bandings and affordable tenures, and private ownership and private rent is set out below:*

	<b>Market Housing Element (Private Sale and Private Rent)</b>		<b>Affordable Housing Element (Intermediate and Rental Tenure)</b>
	<b>Town Centre</b>	<b>Borough-Wide</b>	
1 Bed	25% - 30%	10%	25% - 30%
2 Bed	40% - 45%	25%	30% - 35%
3 Bed	25%	40%	25% - 30%
4+ Bed	5%	25%	5% - 10%

13.15 *The council will expect new residential schemes to reflect the latest evidence of need, subject to density and character considerations. For larger developments, in particular, clear justification will be expected to support a proposed housing mix which significantly differs from that modelled in the SHMA and shown in the table above, or as updated through monitoring as part of the Authority's Monitoring Report.*

- 13.16 *Town Centre mixed use developments will be expected to be built at higher densities whilst including family accommodation, in accordance with Policy H3c. However, this may not necessarily be suitable for all sites.*
- 13.17 *In meeting the appropriate housing mix, the design and layout of buildings and the expected standards for residents must be considered in parallel at the earliest design stage, to ensure viability and suitability of a scheme. Policy DD2 establishes the need for all new development to be designed inclusively, including for residential units to demonstrate they are able to meet Building Regulations Part M Category 2<sup>111</sup> and Policy DD3 identifies the required internal space standards for all new dwellings. Further guidance, including for external space, is provided in the Urban Design SPD.*
- 13.18 *The council will particularly seek to achieve a mix of dwelling sizes to meet local affordable housing need. The 2019 SHMA has found that the demand for new homes for those in local affordable housing need is reasonably evenly split between one-bedroom, two-bedroom and three-bedroom units. However, this does not justify under-provision of the family-sized accommodation, including the provision of smaller two-bedroom houses, in appropriate schemes.*

### **Affordable Housing**

- 13.19 All Local Plans are required by the NPPF to make provision for meeting affordable housing needs in their area. Failure to address affordable housing needs would have detrimental implications on the economic and social health of the town. Therefore, it is important to secure an appropriate mix of housing types and tenures within developments that come forward over the Plan period.

#### **Strategic Policy H5: Affordable Housing**

40% affordable housing will be required from all residential developments across the borough which fall outside the Town Centre.

The council will expect a minimum of 75% of the affordable housing to be Social Rent and/or Affordable Rent and up to 25% as Shared-Ownership. This equates to 30% of the total scheme for Affordable/Social Rent and 10% of the total scheme as Shared-Ownership, resulting in a 75/25 tenure split.

For sites of 10 dwellings or less, a commuted sum towards off-site affordable housing provision will be sought, unless on-site provision is preferred, with the on-site tenure mix to be agreed as appropriate.

#### Crawley Town Centre

For residential developments within the Town Centre, 25% affordable housing will be required.

The council will expect 60% of the affordable housing in the Town Centre to be Social Rent and/or Affordable Rent, and up to 40% as Intermediate Tenure, to include either Shared-Ownership, Shared-Equity or Affordable Home Ownership tenures. This equates to 15% of the total scheme for Social Rent and/or Affordable Rent and 10% of the total scheme as Intermediate Tenure, resulting in a 60/40 tenure split.

#### Exceptions

Except for sites of 10 dwellings or less, payments in lieu will only be accepted in exceptional circumstances where it can be demonstrated that there are robust planning reasons for doing so and provided that the contribution is of equivalent financial value.

<sup>111</sup> Approved Document M: access to and use of buildings, volume 1: dwellings (2016) MHCLG  
<https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m>



For high density schemes, as defined in Policy CL4 (i), falling outside the Town Centre, should viability evidence be provided to justify similar levels of affordable housing to that required in the town centre, this will be considered with claw-back mechanisms in place to secure higher levels of affordable housing provision, up to the Policy level of 40%, should viability improve during the period of development construction. In exceptional circumstances an off-site commuted payment in lieu may be considered.

The council will only consider relaxing this affordable housing requirement, in part or in full, in exceptional circumstances, where a scheme is clearly subject to abnormal costs, not including land costs, and not otherwise envisaged by the Local Plan Viability Assessment. This must be evidenced by robustly assessed viability appraising various permutations of affordable housing provisions to best address local affordable housing needs which will be independently assessed. Should concessions be agreed by the council then claw-back mechanisms will be expected to be put in place and independently monitored. The scheme must also evidence that it addresses a demonstrative and immediate housing need.

Build to Rent will also be considered as an exception while all units remain for rent. This is further detailed in Policy H6, which will revert back to Policy H5 should such schemes cease to be predominantly private rental.

Rent to Buy is considered as an exceptional Intermediate Tenure that may be considered only in exceptional circumstances where it can be evidenced to address local housing needs, and will not be considered as a rental tenure.

### **Reasoned Justification**

- 13.20 *The cost of market housing for both sale and rent in Crawley is significant, with median house prices in 2018 at £295,000 and median rents of £975 per month. The median house prices now stand at 9.1 times median earnings in Crawley. The significant costs of market housing, and the difficulties facing the younger households and those on low to moderate incomes in being able to afford housing in the private market, directly influences the need for affordable housing in the borough. The Strategic Housing Market Assessment (2019) analysis indicated a net need for 739 affordable homes per year in Crawley, of which 563 dwellings per year are needed as rented affordable housing. This supports a split of 75% rented and 25% shared-ownership homes in Crawley.*
- 13.21 *Affordable housing refers to properties that are offered by the local authority or Registered Providers for rent or part-ownership at affordable levels to eligible households whose needs are not met by the housing open market. The council expects rentals to be offered below market rent levels preferably as Social Rent at target rent levels, otherwise at Affordable Rent levels that shall not exceed 80% of open market rent values. Rent levels shall not exceed Local Housing Allowance rent levels (or its equivalent) where Affordable Rent shall be inclusive of service charges, and provided that there are provisions in place for those homes to remain affordable for future eligible households. The council will always pursue perpetuity in affordable housing provision to ensure the ability to serve future households over the long-term.*

Market-led Housing Schemes	Borough-wide			Town Centre		
	Affordable Rent	Intermediate Tenure	Private Market Sale	Affordable Rent	Intermediate Tenure	Private Market Sale
	<b>30%</b>	<b>10%</b>	<b>60%</b>	<b>15%</b>	<b>10%</b>	<b>75%</b>
	@ 50% OMV	@ 60% OMV	@ OMV	@ 50% OMV	@ 80% OMV	@ OMV
Build to Rent Housing Schemes	Affordable Private Rent	Intermediate Tenure	Private Market Rent	Affordable Private Rent	Intermediate Tenure	Private Market Rent
	<b>30%</b>	(deferred)	<b>70%</b>	<b>20%</b>	(deferred)	<b>80%</b>
	@ 80% OMRV	n/a	@ OMRV	@ 80% OMRV	n/a	@ OMRV

### Rental Tenure

13.22 *Borough-wide the council requires 40% affordable housing of which 75% is to be rental tenure, and in the Town Centre the council requires 25% affordable housing of which 60% is to be rental tenure. While Social Rent at target rent levels is preferred as being more affordable to those in housing need, the council accepts that this form of tenure requires higher levels of cross-subsidy. In the absence of sufficient subsidy, Affordable Rent tenure, as defined by the NPPF, will be acceptable and will be the minimum expectation in every instance.*

13.23 *Affordable Rented properties are to be made available to Registered Providers at their best consideration. Only in the event that a Registered Provider cannot be secured for the affordable rent units then after reasonable and evidenced endeavours, the council may explore alternative tenures at a similar level of discount, and only in exceptional circumstances may the council consider accepting a commuted payment in lieu of on-site affordable housing at the equivalent of 50% of Open Market Value.*

### Intermediate Tenure

13.24 *While Crawley's predominant requirement is for affordable rented accommodation, Crawley also has a need for "intermediate" affordable housing. The Strategic Housing Market Assessment (2019) identifies that there is evidence to support the need for 25% of all affordable housing to be provided as affordable home ownership provision within Crawley, while the NPPF stipulates a minimum requirement of 10% of all residential dwellings to be made available for affordable home ownership. This shall remain the council's minimum requirement in every instance with off-site commuted payment in lieu only accepted in exceptional circumstances.*

13.25 *The intermediate housing market is identified as an emerging housing market; made available to households who are unable to buy a home on the open market. Intermediate housing includes Shared Ownership, Shared Equity and Discounted Market Sale, while Rent to Buy and First Homes may also be considered as an Intermediate Tenure if evidenced to address local housing needs. In all circumstances the council will seek to secure an element of perpetuity to address affordable housing needs into the long-term.*

13.26 *The council recognises that for the smaller sites, this tenure split may sometimes be impractical in management terms. In such cases, the composition of affordable housing will be agreed having regard to site specific circumstances and the particular needs of the locality, with rental accommodation remaining the first choice of tenure. The split between affordable housing for rent and other intermediate affordable housing will be kept under review through Supplementary Planning Documents, as appropriate, reflecting changes in local needs.*

13.27 *Shared ownership properties, where required, are to be made available to a Registered Provider at their best consideration. In the event that a Registered*

*Provider cannot be secured for the Shared-Ownership properties following reasonable and evidenced endeavours, then Shared Equity or Discounted Market Sale may be considered at 40% discount to market value, which shall be structured in perpetuity. In certain settings where a lower affordable housing requirement is permitted, such as the Town Centre, then there may not be the need to secure a Registered Provider and Shared-Equity or Discounted Market Sale may be considered in the first instance, where a minimum of 20% discount to market value will be expected, and secured in perpetuity. In either instance, the discounted equity shall either remain locked-in by way of a Covenant on Title, or transferred to the council by way of a Second Charge on Title. Only in exceptional circumstances will a commuted payment be considered in lieu of on-site affordable housing.*

### Policy Context

- 13.28 *The NPPF establishes an expectation that major development involving the provision of housing should include at least 10% of the homes to be available for affordable home ownership<sup>112</sup>. However, exceptions to this element are allowed where this would “exceed the level of affordable housing required in the area or significantly prejudice the ability to meet the identified affordable housing needs of specific groups”<sup>113</sup>. Whilst Crawley has an affordable home ownership need, the intermediate tenures (such as shared ownership) are a more appropriate form of affordable home ownership for Crawley. Furthermore, because there is a clear and acute need for rented affordable housing from lower income households, it is important that a supply of rented housing is maintained to meet the needs of this group. Where affordable home ownership is agreed, securing perpetuity to ensure housing remains at a discount for future eligible households will be the council’s priority. More detail will be provided in the updated Affordable Housing Supplementary Planning Document in due course.*
- 13.29 *Private Market Rent reflects open market rental values and, therefore, falls outside of the definition of affordable housing. However, this form of tenure is emerging through the Build to Rent programme on dedicated market rent schemes and this rental tenure may play a part in meeting affordable housing need where rent levels are contained to within Local Housing Allowance rates with nominations offered to the council. The council’s policy approach to affordable housing provision in Build to Rent schemes is detailed further in Policy H6 below.*
- 13.30 *Crawley Town Centre is expected to deliver high density residential schemes as defined in Policy CL4, where, due to the form of high density construction and higher land values in the Town Centre, viability is known to be a significant challenge to delivery.*
- 13.31 *Section 106 Planning Agreements (or Unilateral Undertakings) will be required to secure the delivery of affordable housing. The council will expect affordable housing to receive free serviced land as a starting point, whereby the Registered Provider receives transfer of the built-out units at a price commensurate with the affordable tenure or under special circumstances receives free transfer of serviced land at an equivalent aggregate value. The S106 Agreement will require applicants to provide an Affordable Housing Scheme setting out the provisions of affordable housing in keeping with this Policy requirement.*
- 13.32 *Information regarding the expected contributions associated with this Policy is set out in the Planning Obligations Annex attached to this Local Plan. This has been subject to scrutiny through the Whole Plan and CIL Viability Study (2020) and meets the requirements of the national Planning Practice Guidance. Viability will not be an*

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<sup>112</sup> As defined in the NPPF Glossary, National Planning Policy Framework, page 64 (2019) MHCLG

<sup>113</sup> National Planning Policy Framework, paragraph 65 (2019) MHCLG

*argument for not meeting the Policy requirements for 40% affordable housing, with a 75%/25% tenure split between rental and shared-ownership in most cases, or 25% affordable housing on a 60%/40% tenure split in the Town Centre. National guidance<sup>114</sup> is clear that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. The weight given to any viability assessment submitted alongside a planning application which seeks to differ in the affordable housing contribution from the Policy position of 40% with the 75/25 tenure split, or 25% on a 60/40 tenure split, will be a matter for the Local Planning Authority and will only be considered where there are costs associated with a particular site which could not have been envisaged at the Plan-making stage or where circumstances have changed since the Plan was brought into force.*

- 13.33 *In such 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. This will need to reflect the recommended approach in national planning guidance, including standardised inputs. Where this is agreed it will also be necessary for the viability assessment to undertake modelling of various affordable housing options rather than relying on an assumption that no affordable housing can be provided. This viability assessment 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 developer's expense to monitor the scheme against the claw-back provisions.*
- 13.34 *In any case, the national expectation, as set out by the NPPF, is that major housing developments will make at least 10% of the homes available for affordable home ownership, unless this would significantly prejudice the ability to meet the identified affordable housing needs of specific groups<sup>115</sup>. For sites in Crawley, therefore, and only where exceptional viability circumstances exist, the minimum of 10% affordable home ownership is expected to be provided as an absolute minimum on any particular housing scheme. The council will also consider negotiations in relation to rental tenure for this proportion as a preferred alternative, due to the significant affordable rental needs arising from the borough.*

## **Build to Rent**

- 13.35 Build to Rent is considered to be a distinct asset class within the private rented sector in Planning Practice Guidance, and has been defined in the NPPF glossary in order to simplify its treatment within the planning system. According to the NPPF, Build to Rent means 'purpose built housing that is typically 100% rented out'<sup>116</sup>.

### **Policy H6: Build to Rent**

A proposal including Build to Rent housing will be supported where it is in conformity with the other policies and requirements of this Local Plan.

Build to rent schemes are regarded as an exception to Policy H5, whereby Policy H5 will be deferred for as long as the scheme remains all-rental, during which time Affordable Private Rent is expected on the following basis:

- i. Schemes shall incorporate an element of Affordable Private Rent comprising:
  - 20% of dwellings in schemes within the Town Centre, or

<sup>114</sup> National Planning Policy Framework, paragraph 57 (2019) MHCLG

<sup>115</sup> National Planning Policy Framework, paragraph 64 (2019) MHCLG

<sup>116</sup> National Planning Policy Framework, Glossary (2019) MHCLG

- 30% of dwellings in schemes elsewhere in the borough.

In both settings rentals will not exceed either 80% of market rent values or Local Housing Allowance rates, and shall be offered to the council for qualifying nominations on an Assured Shorthold Tenure (AST) basis. Under no circumstances will less than 20% Affordable Private Rent be provided in line with NPPF guidance.

- ii. A deferred Affordable Housing Scheme is to be identified, for future provision in the event that the scheme ceases to be all-rental, in accordance with the requirements of Policy H5 (as applicable to the location of the development).
- iii. The deferred Affordable Housing Scheme will be triggered and delivered in the event that the scheme ceases to be all-rental, and shall be disposed of to a Registered Provider at their best consideration.

In order to qualify as Build to Rent for the purposes of this Policy, schemes must adhere to the Build to Rent definition in the Glossary to the NPPF and will be required to enter into a S106 Agreement which will include provision regarding the following issues:

- a) Securing the status of the units as Build to Rent for at least 15 years;
- b) Securing the unified ownership and unified management across the Build to Rent scheme, embracing both Market Rent and Affordable Private Rent units;
- c) Affordable housing requirements (including review mechanisms where appropriate) and regular provision of evidence of compliance by the scheme operator;
- d) Securing council nomination rights in respect of the affordable units through an agreed Deed of Nomination;
- e) Clawback mechanisms to secure compensation in the case of the loss of Market Rent homes before the expiry of the covenant period, or in the event that the affordable housing does not fully meet the policy requirement;
- f) Scheme management arrangements.

### **Reasoned Justification**

- 13.36 *Planning Practice Guidance states: 'As part of their plan making process, local planning authorities should use a local housing need assessment to take into account the need for a range of housing types and tenures in their area including provisions for those who wish to rent.' It further states that 'If a need is identified, authorities should include a plan policy setting out their approach to promoting and accommodating build to rent.'*
- 13.37 *To accommodate this particular investment model, and where ongoing management is to be provided in a fully rented scheme, the council will not require a Registered Provider to take on the affordable units, and council is prepared to defer the full application of the requirements of Policy H5 for as long as the scheme remains all-rental.*
- 13.38 *In such circumstances, the council will require the rentals to be made available at affordable rent levels, not exceeding 80% of the equivalent open market values and not exceeding Local Housing Allowance rates, and the council will enter into a Lettings Agreement to allow for qualifying nominations to be made into the affordable private rented units.*
- 13.39 *The scheme will be expected to enter into a S106 Agreement that will remain with the land, and in the event that the scheme ceases to be all-rental the S106 Agreement will require the affordable units, including the deferred shared ownership/intermediate tenure properties, to be made available to Registered Providers in line with the*



*council's affordable housing policy, which shall include any claw-back provisions in the event that council allows any concessions to the affordable housing Policy H5 requirements.*

## **Self and Custom Build**

13.40 Self-build and custom-build housing is defined in the NPPF as 'housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing'<sup>117</sup>. Planning Practice Guidance states that 'in considering whether a home is a self-build or custom build home, relevant authorities must be satisfied that the initial owner of the home will have primary input into its final design and layout'.

### **Policy H7: Self and Custom Build**

A proposal including self-build and/or custom-build housing to be provided on a serviced plot of land will be supported where it is in conformity with the other policies and requirements of this Local Plan.

Subject to the exceptions listed below a residential (Use Class C3) development including 50 or more units will be required to provide 6% of the total area occupied by residential plots in the form of serviced plots for self-build and custom housebuilding.

The exceptions are:

- i. Developments providing a proportion of affordable housing over and above the proportion required in accordance with Policy H5, may offset this additional proportion against the self-/custom-build requirement by reducing the requirement by one percentage point for each additional percentage of units delivered as affordable housing;
- ii. Developments containing only flatted development;
- iii. Developments on sites whose total area is at least 50% brownfield;
- iv. Developments where the residential element consists solely of converted floorspace.

Self- and custom-build plots must have access to the public highway and connections to electricity, water, wastewater and telecommunications services, or be capable of being provided with them before the expiry of any planning permission or permission in principle granted in relation to them.

Self- and custom-build plots provided in accordance with the 6% requirement detailed above will be subject to a legal agreement requiring that they be marketed for 12 months, after which they may be developed as speculative housing in accordance with the other policies and requirements of this Local Plan.

Any proposal (either in the form of an outline or full application) for more than one dwelling which includes an element of self- or custom-build housing must be identified as a phased development and supported by a phasing plan.

### **Reasoned Justification**

13.41 *The Self-build and Custom Housebuilding Act 2015 requires Local Authorities to maintain a register of individuals and associations who are seeking to acquire serviced plots of land for the purpose of building homes for their own occupation. The same Act requires councils to have regard to the demand demonstrated by their*

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<sup>117</sup> National Planning Policy Framework, Glossary (2019) MHCLG

*Register when carrying out their functions with regard to planning, housing, the disposal of council land, and regeneration.*

- 13.42 *As of 1 April 2019, there were 71 individuals and no associations entered on Crawley Borough Council's Self-build and Custom Housebuilding Register. The Register is divided into Part 1 and Part 2, with only applicants who pass a Local Connection Test being included in Part 1. As of 1 April 2019 there were 59 individuals on Part 1 of the Register and 12 on Part 2.*
- 13.43 *The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) further introduces a 'Duty to Grant Planning Permission'. This requires the council to grant 'suitable development consent' in respect of a sufficient number of serviced plots of land to match the number of entries on Part 1 of the Register. Entries are divided into annual 'base periods', according to their date, with the corresponding suitable development consents being required to be granted within three years after the end of each base period.*
- 13.44 *The acute affordable housing need in the borough justifies offsetting affordable housing delivery against Self-build and Custom build units. Much of Crawley's future housing delivery is envisaged as flatted schemes on brownfield sites, with some as converted building, where it is recognised it would be impracticable to require Self or Custom-build units.*

### **Gypsy, Traveller and Travelling Showpeople**

- 13.45 The Housing Act 2004 requires all local authorities to assess the accommodation needs of Gypsies, Travellers and Travelling Showpeople, take account of their needs in accommodation assessments, and outline how identified needs will be met. Furthermore, the National Planning Policy for Traveller Sites requires that local planning authorities make an assessment of their accommodation needs for the purposes of planning and to develop fair and effective strategies to meet this need through the identification of land for sites.

### **Policy H8: Gypsy, Traveller and Travelling Showpeople Sites**

#### Site Provision

The following site is allocated on the Local Plan Map as a reserve Gypsy and Traveller site for up to ten pitches to meet the future needs of the existing population within Crawley. This site is considered to be critical to the delivery of future Gypsy and Traveller pitches in Crawley and is identified as being 'developable' in years 6-10 or 11-15 (2026/27 – 2036/37) of the Plan, dependent on when the 'need' arises.

- Broadfield Kennels, southwest of the A264

Acceptable development of this site will include adequate highway and pedestrian and cycle access being achieved, along with appropriate design, layout and landscaping to ensure the requirements of the AONB Management Plan are satisfied and the impacts of development adjacent to the country park are mitigated. Both the landscape character and ecological value of the Broadfield Kennels site will be assessed, and any harmful impacts will be adequately mitigated if required.

Ongoing monitoring of Gypsy, Traveller and Travelling Showpeople accommodation needs within Crawley will ensure that any identified 'need' for a Gypsy and Traveller pitch is accommodated on the reserve site.

#### Criteria for Assessing other Proposals

Proposals for a new permanent or transit Gypsy, Traveller and Travelling Showpeople site will only be considered suitable if the proposed site:

- a) is not subject to existing or predicted air, road and/or rail noise in excess of 57 decibels for permanent sites, 60 decibels for long term temporary sites of up to one month, and 66 decibels for temporary sites;
- b) does not create a design and amenity impact that is incompatible with the surrounding area, particularly when located within residential areas or on land beyond the Built-up Area Boundary;
- c) is not located in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans;
- d) is in a sustainable location that reduces the need for long distance travelling, and to reflect traditional lifestyles, whereby some travellers live and work in the same location;
- e) avoids placing undue pressure on infrastructure and community services; and
- f) meets an identified local need for Gypsy, Traveller and Travelling Showpeople accommodation.

Where proposals are located in areas predicted to be noise affected at some point in the future, temporary planning permission may be appropriate.

### **Reasoned Justification**

- 13.46 *Crawley is a constrained urban environment and is in a position where difficult prioritisation of new development is required as the last undeveloped or underdeveloped sites are allocated for future uses. This situation results in high land values and limited opportunities for Gypsies, Travellers and Travelling Showpeople to bring forward site provision themselves. There are currently two authorised Gypsy and Traveller sites in Crawley, for four pitches in total, and one authorised site for Travelling Showpeople with three plots, but there is a more substantial local population living within bricks and mortar accommodation.*
- 13.47 *The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2020) for Crawley indicates a potential future need of up to ten pitches for Gypsies and Travellers arising from the existing population within Crawley. Whilst the survey work completed for those in bricks and mortar accommodation has not identified any immediate need for additional sites, it is inherently improbable that within the next 15 year period there will be no new households formed requiring additional site provision.*
- 13.48 *This need will be met by the provision of a site at the former Broadfield Kennels, southwest of the A264. This site is located within the High Weald AONB and outside the current Built-Up Area Boundary (BUAB). Therefore, the site will need to be well planned and soft landscaped to ensure that the visual impact on the AONB is negligible and that the natural landscape is, where possible, positively enhanced. Mitigation measures for the potential impact on the natural environment will be sought where appropriate. The council will continue to search for and analyse the potential for alternative sites as factors change over the Local Plan period, most critically in relation to the future expansion of Gatwick Airport. The council will continue to work cooperatively with its neighbouring authorities to maintain constructive joint working across the Gatwick Diamond.*
- 13.49 *In addition, this Policy also outlines the criteria upon which any other Gypsy, Traveller and Travelling Showpeople proposals will be assessed to ensure site provision occurs in locations that offer a suitable living environment for future inhabitants and protects existing neighbours from inappropriate development.*
- 13.50 *To deal with sites brought forward privately on unallocated land, land ordinarily considered suitable for housing development will be considered suitable for traveller accommodation subject to the proposal being compatible in design and amenity terms with the surrounding area, especially where proposals include employment*

*based activities within their proposals. However, caravans offer a much lower level of acoustic attenuation than bricks and mortar accommodation and the long term exposure to noise would affect the residents' health. Exposure to noise in excess of 57 decibels on a permanent basis, 60 decibels for long term temporary sites of up to one month and of 66 decibels for temporary sites would not be in the long term interest of future inhabitants.*

## **Houses in Multiple Occupation**

13.51 A house in multiple occupation (HMO) is a property that is occupied by a number of individuals who share facilities, or do not have exclusive occupation of the whole property. HMOs generally comprise accommodation where three or more individuals share basic amenities (bath/shower, WC or kitchen). HMOs can commonly be occupied by a group of individuals (e.g. students, young professionals, etc.) sharing a house or flat, individuals living in sub-divided bed-sit accommodation, and some properties converted into several flats. Bed and breakfast and hostel accommodation occupied by individuals as their permanent address are also considered to be HMOs.

### **Policy H9: Houses in Multiple Occupation**

Proposals for the development of, and change of use of an existing property to a House in Multiple Occupation will normally be permitted provided that:

- i) The location, design and layout of the development is appropriate for the proposed occupiers;
- ii) The proposal, by virtue of its intensity of occupation and activity or due to its cumulative impact in the area, would have no adverse impact upon the character of the area and the amenity and privacy of neighbouring properties;
- iii) Development can meet its operational needs (e.g. parking, servicing) including Crawley Borough Council's adopted HMO Standards.

### **Reasoned Justification**

13.52 *HMOs provide a much-needed source of housing supply in Crawley, particularly for people employed in the service sector. However, a large number of HMOs in one area can change the physical character of that area and this can lead to conflict with the existing community. Tenants equally can suffer from poor conditions and mismanagement of the properties by landlords.*

13.53 *There continues to be a need for this type of accommodation in Crawley since it provides affordable and convenient accommodation for a wide range of groups, including young single people and those requiring care in the community. Whilst shared accommodation is normally appropriate within residential areas close to shops and services, it can also cause problems due to the intensity of occupation and activity. Accordingly, regard must be had to the standard of this accommodation, traffic, and parking implications together with its impact upon the amenity and privacy of neighbouring properties and the general character of the area. Appropriate measures may be required to minimise the transmission of noise and generally to avoid causing a nuisance to neighbouring properties.*

13.54 *Policy H4 (Future Housing Mix) recognises that the planning system can assist in achieving a mix of households within the town's neighbourhoods by meeting different housing needs whilst protecting the interests of other residents, landlords and businesses. This can best be delivered by preventing the development of excessive concentrations of HMOs and encouraging a more even distribution across the town. Some neighbourhoods, including Furnace Green, Ifield, Langley Green, Southgate and West Green have significant concentrations of HMOs, particularly in areas with larger semi-detached and detached dwellings and townhouses.*

- 13.55 *The main concern with HMOs is that a large number of individuals can occupy one property, all living independently and creating more disruption to surrounding areas than a group of people living together, in terms of noise, parking and general disturbance associated with daily routines. Inadequate parking leading to unauthorised parking is a significant issue in many neighbourhoods in Crawley, with the early New Town neighbourhoods planned with one car parking space per nine houses. It is important to have policies which can control issues such as this and to ensure that permission is only granted for those properties that have adequately sized rooms and suitable communal facilities for its occupants as well as being in appropriate locations, in terms of proximity to public transport routes.*
- 13.56 *Given that councils no longer have control over the loss of dwellinghouses to small HMOs, there is a high risk of concentrations of HMOs. It is considered that, where possible, new HMOs should be monitored by location and concentration. Consideration may need to be given to the need to introduce Article 4 Directions removing Permitted Development Rights for the conversion of dwellings to small HMOs.*
- 13.57 *In assessing the acceptability of a proposed HMO in terms of cumulative impact and the local concentration of HMOs, the council will operate in accordance with the following principles:*
- *The proportion of residential dwellings within any area subject to an Article 4 Direction in respect of change of use to a HMO, including the application property, which are HMOs should not exceed 20%;*
  - *Proposals for new HMOs will be resisted where they would result in a neighbouring residential property which is not an HMO being bounded by HMOs on both sides within a street frontage;*
  - *HMOs should not form continuous frontages of more than two residential dwellings.*
- 13.58 *The council will introduce further supplementary guidance on the application of this Policy in due course.*



## Environmental Sustainability

### **Protecting the Environment: Sustainability**

*By 2037, in response to the Climate Emergency, significant progress will have been made towards Crawley becoming a carbon neutral town. Crawley will be seen as a place where green growth is the driver of the economy and where green technology and businesses can thrive. Active travel and public transport will be significantly improved and supported by a road network that prioritises sustainable transport modes. Electric Vehicles will be promoted along with, and through, e-car clubs. A sustainable road network will be complemented by a good public transport system, giving people choice about how they travel. As a modern town, the technological and communication infrastructure will be in place to ensure residents and businesses have the support needed to develop and grow.*

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



## Green Infrastructure & Biodiversity

- 14.1 Crawley's natural environment is critical for wildlife conservation, adapting to and mitigating the effects of climate change as well as being of great importance to the health and wellbeing of the people who live, work and visit Crawley.
- 14.2 Throughout the borough there is a wide range of sites important for nature conservation and biodiversity, including extensive areas of woodland, local nature reserves, public parks and smaller areas within the neighbourhoods. This network of green spaces support natural processes, such as flood mitigation and carbon capture and supports the health and quality of life of the population. Crawley's waterways also have an important biodiversity role, albeit that many are culverted underneath the urban area.

### Chapter Content

- 14.3 This chapter sets out policies to guide the relationship between development proposals and local, national and global environmental protection and enhancement of the borough's green infrastructure.

### The Key Issues

- 14.4 With an increasing population and the consequent need for development, the impact on the natural environment is a key issue. The planning policies in this chapter will ensure that Crawley's natural and semi-natural environment is enhanced as Crawley grows and changes over the next 16 years.
- 14.5 As a New Town, Crawley was originally designed with many green spaces and landscaping integrated within the developed area. These serve to separate and give identity to the neighbourhoods. Increasing levels of development present a potential threat to the amenity and biodiversity value of green infrastructure in Crawley. There is a risk that this becomes further fragmented and that the quantity and quality of green space is reduced.
- 14.6 The Natural Environment White Paper (DEFRA, 2011) highlighted that nature in England is highly fragmented and unable to respond effectively to pressures such as climate and demographic change. Crawley has an extensive network of green spaces, many of which have or are capable of increased biodiversity value to help the town adapt to climate change and create an overall net gain in biodiversity. It is important that the Local Plan ensures that development does not compromise the ability of the town to achieve the above aims and where possible that enhancement is encouraged.

### Local Plan Policies

#### Green Infrastructure

- 14.7 Green infrastructure is the network of multi-functional green space and waterways both new and existing, and both rural and urban which supports natural and ecological processes and is integral to the health and quality of life of the population.
- 14.8 It consists of useable spaces for both people and wildlife and ranges from large-scale areas of public open space and recreational space, including accessible countryside to smaller scale provision in the form of street trees, private gardens and allotments. The term 'multi-functional' refers to the various functions for example, local character, functional linkages, recreation, meeting community needs, visual amenity,

biodiversity and/or local food or energy crop production. Crawley's green infrastructure network extends into the countryside beyond the Built-Up Area Boundary and beyond the borough's administrative boundaries. These links should be maintained, enhanced and created as development in the town continues.

- 14.9 Green infrastructure can also offer benefits as a "Nature Recovery Network". This is a joined-up system of places important for wild plants and animals. It allows plants, seeds, nutrients and water to move from place to place and enables the natural world to adapt to change. It provides plants and animals with places to live, feed and breed. It can only do so effectively if, like the road network, it is treated as a joined-up whole.
- 14.10 The provision of safe and accessible green infrastructure is acknowledged as being one of the key ways to achieve healthy, inclusive and safe places which enable and support healthy lifestyles<sup>118</sup>. In particular for Crawley, as a Dementia-Friendly town, it is vital that people with dementia stay as active as they can – physically, mentally and socially. People with dementia need meaningful activities they enjoy, which can maintain their confidence. Access to green space and nature has particular benefits for people with dementia, including better mood, memory and communication and improved concentration<sup>119</sup>.

### Strategic Policy GI1: Green Infrastructure

Any growing urban area will place additional stress on the natural environment, including the aquatic environment. Crawley's multi-functional green infrastructure network will be conserved and enhanced through the following measures:

- i. Development which protects and enhances green infrastructure will be supported;
- ii. Development proposals should take a positive approach to designing green infrastructure, utilising the council's supplementary planning documents to integrate link and enhance the network of green assets;
- iii. Development proposals which reduce, block or harm the functions of green infrastructure should be avoided. Any loss or impact will be required to be adequately justified, minimised, mitigated or, as a last resort, compensated for, to ensure the integrity of the green and blue infrastructure network is maintained;
- iv. The strategic green infrastructure network is afforded the highest protection due to its high value from existing or identified potential multiple functions, for example as recreation, routeways, access to the countryside, wildlife and climate mitigation;
- v. Development proposals should maximise the opportunity to maintain and extend green infrastructure links to form a multi-functional network of open space, providing opportunities for walking and cycling, and connecting to the urban/rural fringe and the wider countryside beyond;
- vi. Cross-boundary matters relating to green infrastructure should be considered and incorporated at the early stage of an application;
- vii. Large development proposals will be required to provide new and/or create links to green infrastructure as well as take into consideration the use of SuDS and methods that incorporate blue infrastructure into development designs to improve the visual amenity of the development, to account for Policy EP1 and to aid in reducing surface water run-off.
- viii. Householder developments and small non-residential extensions should take into account Policy EP2 and innovative solutions that incorporate green and blue infrastructure into designs at an early stage.

<sup>118</sup> National Planning Policy Framework, para. 91c (2019) MHCLG

<sup>119</sup> Dementia and Town Planning RTPi Practice Advice 2017, page 4 (2017) RTPi

- ix. Where possible, Natural England's Accessible Natural Green Space Standard recommendations and the Woodland Trust's Woodland Access Standard should be used to assess a development proposal's location in relation to existing accessible natural green space and woodland. As a minimum, developments should seek to ensure new development proposals meet the Crawley local standards for natural greenspace set out in paragraphs 7.13 and 14.16 relating to quantity, accessibility, quality and value.

### **Reasoned Justification**

- 14.11 *Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries<sup>120</sup>.*
- 14.12 *Proposals for development will increase pressures on the borough's landscapes and green spaces, presenting opportunities for enhancing and extending Crawley's green infrastructure. For the town to develop and grow in a sustainable manner, it is important to ensure that green infrastructure is embedded in the planning process at the earliest stage.*
- 14.13 *Green infrastructure should not just be considered as an adjunct to new development. Connected networks of green spaces around new development should be treated as integral to the planning and design process conscious of its place within wider green infrastructure networks. This is assisted by an integrated review of existing green infrastructure functions (biodiversity, flood management, rights of way, open space, etc.). The Green Infrastructure Study (2016) identifies deficiencies and need in relation to future growth and the desires of the town's residents to determine where improvement should be focused. An Ecological Services study (2020) has been undertaken for Crawley, which identifies the opportunities of Crawley's green infrastructure to meet a wide range of positive functions, including air quality, noise mitigation and ecological connectivity. This baseline evidence will be used to consider opportunities for improving and extending these functions through new landscaping and open space provision through new development schemes and to assess the cumulative and wider impact of development proposals on the green infrastructure network.*
- 14.14 *The NPPF requires local authorities to plan strategic development considering the impacts on existing infrastructure and the need for new infrastructure to service that development and also to contribute to and enhance the natural and local environment. The Local Plan evidence base, including consultation responses, provides a clear message that Crawley's green infrastructure is fundamental to residents' quality of life and the wider environment. The Green Infrastructure Policy and design, landscape, open space and biodiversity policies seek to reflect that importance.*
- 14.15 *Through a range of Local Plan policies, the council will seek to achieve the provision, retention and/or enhancement of the specific functions of green infrastructure:*
- a. Publicly accessible open space including formal sports facilities and informal amenity space;*
  - b. The High Weald Area of Outstanding Natural Beauty;*
  - c. Beyond the built up area where landscape character areas have been defined;*
  - d. Value of existing soft landscaping – character and appearance, structure, screening or softening;*

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<sup>120</sup> National Planning Policy Framework, para. 171 (2019) MHCLG

- e. Requirements of development – amenity spaces including private gardens, landscape schemes, street trees, green roofs and walls and links to and between areas of public open space and accessible countryside;
- f. Areas of biodiversity value such as Local Wildlife Sites, Local Nature Reserves, adjacent SSSIs, Biodiversity Opportunity Areas and Ancient Woodland;
- g. Waterways and water bodies;
- h. Heritage Assets;
- i. Opportunities to meet open space, sport and recreation needs;
- j. Green spaces for flood storage, conveyance, and SuDS.

14.16 The table below sets out Natural England’s Accessible Natural Greenspace Standards and the Woodland Trust’s Access Standard. Ideally, both sets of standards should be met for all new development to be located within the distance criteria for each size of accessible natural greenspace and woodlands. However, it is recognised that in an urban area such as Crawley, where there is a lack of available land for large new provision, a pragmatic approach is necessary. The table below also sets out the local standards for natural greenspace established by Crawley’s Open Space, Sport and Recreation Assessment (2020).

Natural England’s Accessible Natural Green Space Standards <sup>121</sup> recommend that all people should have accessible natural green space:	• Of at least two hectares in size, no more than 300m (five minutes’ walk) from home.
	• At least one accessible 20-hectare site within 2km of home.
	• One accessible 100-hectare site within 5km of home.
	• One accessible 500-hectare site within 10km of home.
	• A minimum of one hectare of statutory local nature reserves per 1,000 people.
	• That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.
The Woodland Trust’s Woodland Access Standard <sup>122</sup> aspires that:	• 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.
	• No person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size; and
Crawley Open Space, Sport and Recreation Local Standards for Natural Greenspace	• 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.
	• Quantity Standard: 1.8ha per 1,000 population.
	• Accessibility/Walkability Standard: 720m (15 minutes’ walk).
	• Quality Standard: Green Flag Quality Score of 70% to achieve a Good Quality Score or above.
	• Value Standard: Value Score of 60% and above to achieve a High Value Score.

14.17 Existing natural green space provision within Crawley compares, as follows, against the local standards:

- Quantity Standards: The Open Space Assessment identified 93 Natural Green Spaces in Crawley, covering 296.62ha. This equates to 2.64ha per 1,000 population, currently exceeding the quantity standard borough-wide. However, the Assessment has shown that in some urban areas, such as Langley Green,

<sup>121</sup> Accessible Natural Green Space Standards in Town and Cities (2011) Natural England

<sup>122</sup> Space for People, Targeting Action for Woodland Access (2017) Woodland Trust



*Southgate and West Green, the provision is already lower than this standard. The borough-wide provision is predicted to fall to 2.25ha per 1,000 population over the Plan-period, as the population increases (without new provision being made). Whilst for the borough as a whole this remains above the overall Quantity Standard of 1.8ha per 1,000 population, existing deficiencies in some areas are increased and deficiencies in provision will occur in Northgate and Three Bridges.*

- *Accessibility Standards: Whilst the Assessment shows that almost all of Crawley meets the local accessibility standard for natural greenspace across the borough, the analysis looked at provision of Natural Green Space by including and excluding large natural green space sites which are 40ha or more. The larger sites tend to be in the countryside on the edge of the borough, and whilst publically accessible, may not be as accessible to all, compared to smaller urban open spaces equivalent to parks, gardens and amenity spaces.*
- *Quality Standards: For the natural greenspace sites audited as part of the Assessment, quality scores ranged from 36 – 82% (Poor to Very Good) averaging 55% (Fair). The greatest number of sites fall into the Poor and Fair category.*
- *Value Standards: Value scores for the borough's natural greenspace sites ranged from 14% – 60% (Low to High).*

14.18 *In light of these findings and consistent with Policy OS2 and GI3, new developments should ensure they mitigate against placing greater pressures on existing natural greenspace. Ideally developments should be located close to areas of accessible natural greenspace. Therefore, new on-site natural greenspace provision in order to provide wildlife value should be considered where this is practical and can be designed in to minimise future management and maintenance concerns.*

*Alternatively, contributions towards access improvements to larger areas of natural green space; improvements to existing natural open space close to the development; or to convert other types of open space for wildlife value will be sought in accordance with the Planning Obligations Annex.*

14.19 *Policy GI2 sets out the policy position in relation to development which is close to, or may affect, ancient woodland and/or veteran trees.*

14.20 *The council's Green Infrastructure SPD and Planning and Climate Change SPD provide further guidance to help applicants make successful applications and to aid the delivery of green infrastructure where required.*

## **Biodiversity Sites**

14.21 To protect and enhance biodiversity and geodiversity, it is important to gain a thorough understanding of habitats and ecological networks. Developers can support an in-depth understanding of local biodiversity sites by:

- a. Identifying, mapping and safeguarding components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national, and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- b. Promoting the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identifying and pursuing opportunities for securing measurable net gains for biodiversity.

## Strategic Policy GI2: Biodiversity Sites

Up-to-date habitat and species surveys and associated reports will be required to accompany planning applications which may affect the areas listed below or sites showing likely ecological value based on past ecological surveys.

If significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated or as last resort compensated then planning permission should be refused.

### Hierarchy of Biodiversity Sites

To ensure a net gain in biodiversity, the following areas and their supporting and connecting habitat will be conserved and enhanced and the council will support their designation and management through Management Plans:

#### 1. Nationally designated sites:

- Sites of Special Scientific Interest (SSSI)

SSSI will receive the highest level of protection for habitat conservation value in line with national legislation, policy and guidance.

#### 2. National Planning Policy Framework Sites:

- Ancient Woodland, and aged or veteran trees

Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. A buffer zone between development and ancient woodland will be required in line with Natural England Standing Advice.

#### 3. Locally designated sites, and habitats and species outside designated sites:

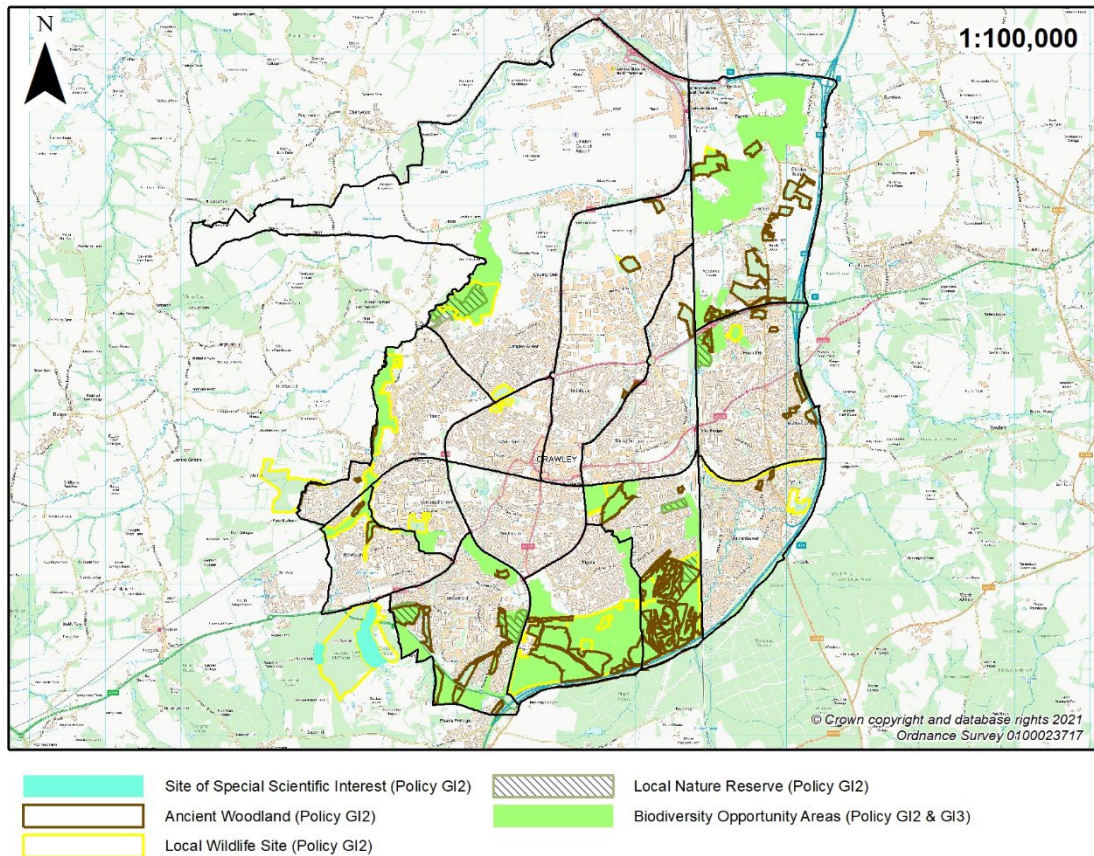
- Local Nature Reserves (LNR);
- Local Wildlife Sites (LWS);
- Nature Improvement Areas;
- Habitats of Principle Importance identified in S41 of the Natural Environment and Rural Communities Act 2006 or Biodiversity Action Plans;
- Biodiversity Opportunity Areas;
- Where Protected Species are present;
- Where Species of Principal Importance are present, as identified in S41 of the Natural Environment and Rural Communities Act 2006.

### **Reasoned Justification**

14.22 *As a public body, Crawley Borough Council has a duty to have regard to the conservation of biodiversity through the proper exercising of all its functions. This is a statutory function set out in Section 40 of the Natural Environment and Rural Communities Act, 2006.*

14.23 *This means that the consideration of biodiversity must be embedded in planning policy which should be making a contribution to the commitments set out in Biodiversity 2020: A Strategy for England's Wildlife and Ecosystems Services. The ambition is to halt overall loss of England's biodiversity by 2020 and in the longer term, move from a position of net biodiversity loss to net gain.*

14.24 *To support this ambition the Local Plan Map identifies components of Crawley's ecological network. This ensures that biodiversity is considered, from protection of habitats and species to identifying opportunities to enhance biodiversity.*



- 14.25 *The Sussex Biodiversity Partnership works together towards achieving biodiversity targets. Biodiversity Opportunity Areas have been identified throughout the south east and are the regional priority areas of opportunity for restoration and creation of Biodiversity Action Plan (BAP) habitats. Within the borough, this includes the Urban Habitat Action Plan (HAP) which highlights the rich biodiversity in Sussex’s urban areas as well as the Deciduous Woodland, Lowland Heathland, and Lowland Meadows HAPs. The council will continue to work collaboratively with partners to protect and improve the natural environment based on locally identified priorities and evidence.*
- 14.26 *Ancient Woodlands are valuable as a biodiversity resource for their diversity of species and longevity as woodland. Areas of ancient woodland are identified on the Local Plan Map and protected by national policy. 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. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat site<sup>123</sup>. A minimum 15 metre buffer should be maintained between a development and the ancient woodland (as advised by a full ecological survey), including through the construction phase, in accordance with the Natural England Standing Advice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.*
- 14.27 *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*

<sup>123</sup> National Planning Policy Framework, para. 177 (2019) MHCLG

*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.*

- 14.28 *Where it is deemed that there is going to be unavoidable residual damage or loss to ancient woodland, the measures taken to compensate for this must be of a scale and quality commensurate with the loss of this irreplaceable habitat. Where ancient woodland is to be replaced by new woodland, this should aim to create 30 hectares of new woodland for every hectare lost.*
- 14.29 *The borough has 12 designated Local Wildlife Sites, formerly known as Sites of Nature Conservation Importance (SNCIs) covering 329.79 hectares in total. Eight sites are borough-owned while four are privately-owned and managed. As of 2018, ancient woodland covers 197.68 ha (4.40%) of the borough, Deciduous woodland 478.56 ha (10.64%), Ghyll woodland 25.49 ha (0.57%), lowland heathland 0.83 ha (0.02%), traditional orchard 0.32 ha (0.01%) and wood-pasture & parkland covers 41.74 ha (0.93%).*

### **Biodiversity Net Gain**

- 14.30 The council is committed to halting the overall decline in biodiversity by ensuring that development minimises impacts on biodiversity and provides net gains including establishing coherent ecological networks that are more resilient to current and future pressures.
- 14.31 Through the 25 Year Environment Plan (2018), the government is introducing a “net gain” principle into statutory policy. In assessing progress, a baseline needs to be set, and metrics and natural capital accounts developed to record progress so that accountability is embedded into the planning system. Natural capital is recognised to be at least as important as physical and human capital in producing economic outputs and hence economic well-being. In 2011, the government committed to working with the Office for National Statistics (ONS) and the Department for Environment, Food and Rural Affairs (Defra) to incorporate natural capital into the UK Environmental Accounts by 2020.
- 14.32 In 2019, draft guidance to support the implementation of the Environment Bill (2019) was published in the form of the Defra Metric 2.0. This has been prepared for: developers who have commissioned a biodiversity assessment using the Metric; communities wanting to understand the impacts of a local development; planning authority decision-makers interpreting Metric outputs included in a planning application; or land owners wishing to provide biodiversity units from their sites to others. The Metric is designed to be used with Ecological Survey’s to acknowledge pre, current and post development biodiversity baselines and is anticipated to be finalised in December 2020.

### Tree and Landscape Character Planting

- 14.33 Trees and soft landscaping makes an important contribution to the character and appearance of the borough and are beneficial in other ways including supporting biodiversity. Additional tree and/or landscape planting will be required to mitigate the visual impact of the intensification of buildings, hard surfacing parking and boundary treatments as well as support the net gain in biodiversity targets. General policy requirements for all new developments regarding landscaping is set out in Policy DD1.
- 14.34 Good quality tree and landscape planting can secure multiple benefits, wider than visual improvements, particularly where this involves habitat creation, through providing one or all of cover, food or water to a targeted species; choosing species for their air quality improvement properties; and where species provide mitigation and adaptation for the impacts of climate change. To maximise the multiple benefits from



landscape planting, detailed consideration is necessary as part of the landscape design of development schemes and sufficient funding for initial planting and ongoing maintenance is required.

- 14.35 The preservation of existing sites is preferable to the development of new habitat – this is covered by Policies GI1, and GI2. The protection and enhancement of Structural Landscaping is covered by Policy CL6. The retention or replacement of existing trees is covered by Policy DD4.

### Policy GI3: Biodiversity and Net Gain

Development whose primary objective is to conserve or enhance biodiversity will be supported.

All development proposals will be expected to incorporate features to encourage biodiversity and enhance existing features of nature conservation value within and around the development.

Development proposals will be required to demonstrate how the scheme will meet the government's requirement for securing a 'net gain' in biodiversity, including information calculating the current biodiversity value of the site. As a minimum, all development proposals will need to achieve a net gain for biodiversity in accordance with government expectations<sup>124</sup>, currently a 10% increase in habitat value for wildlife compared with the pre-development baseline.

Applications should include consideration to securing benefits for the purposes of pollination and biodiversity as part of their on-site landscaping schemes. This can include consideration for green roofs and green walls, where soft landscaping at ground level is limited. Discussions with Gatwick Airport Limited in relation to planting and management to minimise the risk of bird strike should be held at an early stage of landscape design, in accordance with Policy DD5.

Developers may be required to commit to providing an Ecological Management Plan/Biodiversity Offset Management Plan for the development site. This will usually apply to larger developments or where a development site is close to a Local Wildlife Site. Landscape proposals for residential development should contribute to the character and appearance of the town by including at least one new tree, or equivalent soft landscaping, for each new dwelling, of an appropriate species and planted in an appropriate location.

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

Proposals which would result in significant harm to biodiversity will be refused unless:

- i. this can be avoided by locating the development on an alternative part of the site with less harmful impact; or
- ii. the harm can be adequately mitigated, or, as a last resort, compensated for.

Compensation should consider losses of all the benefits provided by the natural environment.

### **Reasoned Justification**

- 14.36 *Much biodiversity is outside designated areas. The government's proposal within the 25 Year Environment Plan to introduce a net environmental gain requirement for new*

<sup>124</sup> Government's Environmental Bill (2019) Defra



development offers a potential source of long-term investment in the delivery of an improved natural environment. The Environment Bill 2019 is in the process of being finalised (2020), Clauses 90 to 94 in Part 6, Schedule 14 and Schedule 7A relate to Biodiversity Net Gain. Planning policies and decisions should encourage multiple benefits from both urban and rural land, including through mixed-use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside.

- 14.37 *It is important that planning decisions take into account biodiversity by ensuring that decisions are based on sufficient information. It's important to note that the pre-development biodiversity value (baseline) is noted as the baseline before any onsite activity is carried out. 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 so that developments will deliver an overall net gain in biodiversity, or mitigation proposals (including where 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.*
- 14.38 *Simple definitions of environmental loss as being just the impact upon wild species or biodiversity are inadequate. Development can generate multiple impacts either directly on environmental assets or mediated through environmental impacts: wild species, recreation and related physical and mental health benefits; water quality and flooding; air pollution emissions and greenhouse gases, etc. It is the loss of benefit value generated by development which should be compensated for. Those whose activities give rise to the environmental damage should pay the associated costs of compensation.*
- 14.39 *In order to calculate the net gain in biodiversity required by new development, it will be necessary to quantify the financial resources needed for the maintenance, restoration and enhancement of ecosystems and natural capital in order to deliver multiple objectives for biodiversity, landscape, the historic environment, water, soil, climate, air quality, flood management and other ecosystem services. The Defra Biodiversity Metric 2.0 as outlined in the Environment Bill presents an option for quantifying biodiversity value. The Planning Obligations Annex confirms the government's guidance and best practice from Natural England will be used to implement this requirement to development proposals in Crawley. Off-site financial provision, or alternative, will be delivered via an identified strategic mechanism for net gain, anticipated to be set out in national guidance.*
- 14.40 *In directing contributions and recommendations for enhancements and improvements for achieving biodiversity net gain at a local and county level and for individual site proposals, advice and recommendations may include future West Sussex action plans or strategies, those produced by or on behalf of the Sussex Biodiversity Record Centre, Crawley Borough Council, and/or the Local Nature Partnership (LNP). The council will work closely with the LNP covering Crawley to prioritise resources towards the improvements and habitat creation which offers the most benefits for Crawley and the Sussex High Weald.*
- 14.41 *The Defra Metric 2.0 lists different types of urban habitat types. The most appropriate types of habitats for developers to provide in landscape schemes from the outset or through compensation where an appropriate number of biodiversity units is provided, include: allotments, artificial lake or pond, bioswale, brown roof, cemeteries and churchyards, extensive green roof, façade-bound green wall, ground based green*

wall, ground level planters, intensive green roof, introduced shrub, amenity grassland, open mosaic habitats on previously developed land, orchard, rain garden, street tree, suburban/mosaic of developed/natural surface, vegetated garden, woodland. The government's National Pollinator Strategy for England (2014) sets out a 10 year plan to help pollinating insects survive and thrive across England. There are at least 1500 species of insect pollinators in the UK. Pollinators face many pressures that with good management can be mitigated against including:

- Habitat loss;
- Pests and diseases;
- Extreme weather;
- Competition from invasive species;
- Climate change; and
- Use of some pesticides.

Some of these management measures could be incorporated into landscape schemes for new development.

- 14.42 *There may be an overlap with on-site tree planting and tree/landscape habitat contributions for each new dwelling, as covered by this Policy, and this can be considered as part of the net gain calculations where the species chosen are agreed as appropriate for this purpose. The Defra Biodiversity Metric 2.0 enables soft landscaping and trees to be quantified into Biodiversity Units. However, replacement trees (Policy DD4) will not count towards the net gain; indeed they may involve a net loss of biodiversity due to the loss of important habitats provided by mature trees, and the potential for new trees to fail.*
- 14.43 *When planting a tree, the existing sewerage and water supply infrastructure should be taken into account, as well as the choice of appropriate tree species for the ground conditions and environment. The Green Infrastructure SPD (Appendix 6) lists appropriate species that could be planted in Crawley. Where possible, UK sourced and grown tree stock should be used to support biodiversity and resilience. Site-specifics such as ground conditions, light/sunlight and proximity to buildings and paving/footpaths must be taken into account to ensure the correct species is used for the location and purpose and does not result in nuisance or early removal of the tree. In addition, other matters for consideration include climate change resilience, pollination opportunities, carbon storage, air quality management, street use and appropriate species to avoid bird strike on aircraft.*
- 14.44 *Where character landscape planting as part of the biodiversity net gain is to be provided on-site in lieu of on-site new tree planting, the planting scheme should be agreed with the council as constituting an equivalent visual contribution to a one tree per dwelling, and must be justified on a case-by-case basis considering the context and design of the scheme, taking into account the multiple benefits provided by trees (including air quality, carbon storage, shading, character, maturity and biodiversity).*
- 14.45 *The cost of off-site planting by the council, in lieu of provision on-site, will be based on the cost of a sixteen to eighteen centimetre girth tree measured at 1.5m off the ground, planting, sundries and watering over a five year period to ensure that the tree becomes established. This is set out in the Planning Obligations Annex. The council will direct this contribution toward provision of new tree planting within a suitable location in the borough or an equivalent alternative landscape habitat.*
- 14.46 *The Manor Royal Design Guide SPD sets out tree planting requirements for sites in Manor Royal.*
- 14.47 *The developer and/or site manager must ensure the relevant management plan is handed over and explained to any maintenance company or staff responsible for maintaining landscaping and/or gardens and buildings. A simplified version should also be provided for householders and other occupiers, explaining how biodiversity is being protected and encouraged on the site. This commitment will form part of the obligations on a planning permission and will be secured by way of a S106 legal agreement and/or planning condition.*

## Local Green Space

14.48 The NPPF empowers local communities to promote the designation of green areas of particular importance for special protection as a Local Green Space.

### Strategic Policy GI4: Local Green Space

The following area is designated as Local Green Space:

#### Ifield Brook Meadows and Rusper Road Playing Fields

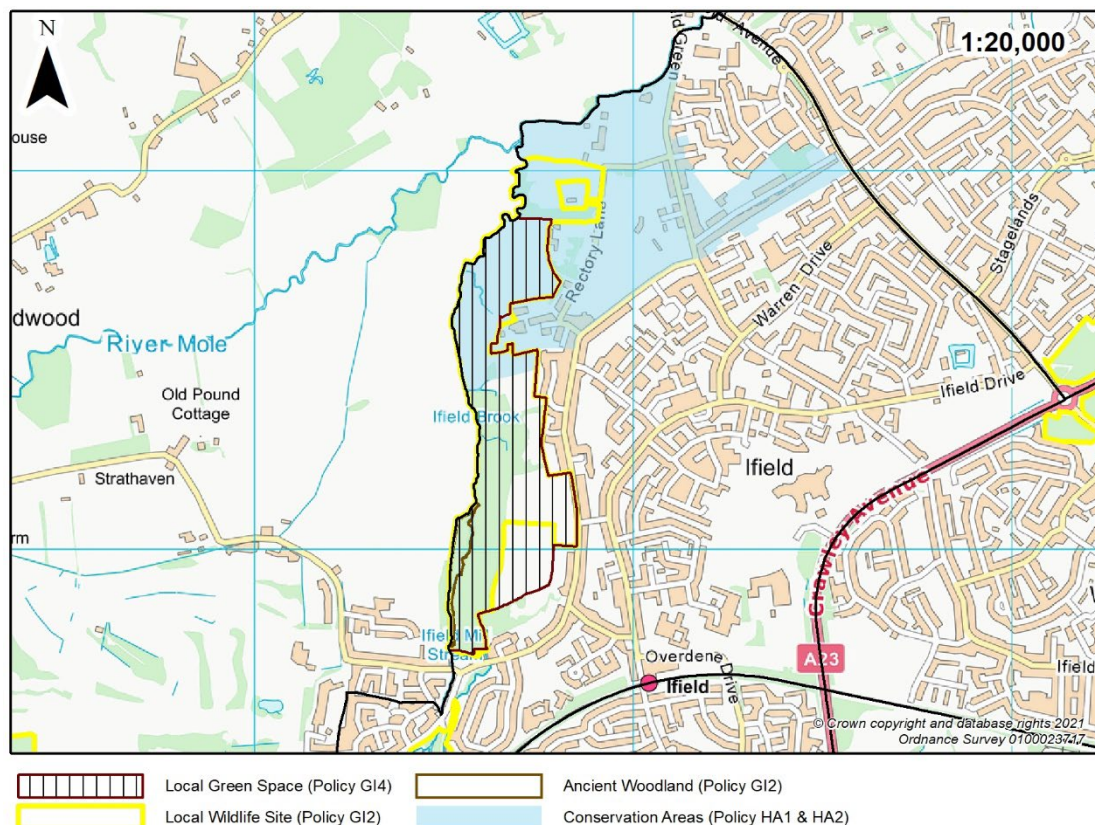
This area is designated due to its value to the local community and local significance in its function as an area for enjoyment of recreation, visual amenity, tranquillity, wildlife, heritage, and highly accessible countryside close to the urban area.

The above area will be safeguarded from development other than in very special circumstances or where the development is to enhance Local Green Space functions, for example, through improvements to access, recreation and wildlife.

### Reasoned Justification

14.49 *Public consultations have consistently shown that Ifield Brook Meadows and Rusper Road Playing Fields should be protected because of their special value to the local community. The Meadows are an important site of nature conservation with distinctive vegetation and wildlife. The northern part of the Meadows is of historic importance, forming part of the Ifield Village Conservation Area, contributing to the setting of the village and church. These elements make this area unique and local in character.*

14.50 *The presumption in favour of sustainable development does not apply to Local Green Spaces. Proposals affecting the designated Local Green Space should be consistent with national Green Belt Policy.*



## Sustainable Design & Construction

- 15.1 Crawley is committed to supporting our legally binding national carbon reduction targets and being carbon neutral by 2050; this is to be achieved by aligning with the national zero carbon agenda in planning policies and by engaging with local businesses and communities.

### Chapter Content

- 15.2 This chapter sets out policies to guide the relationship between development proposals and local, national and global environmental protection.

### The Key Issues

- 15.3 Crawley as a dense urban area has a high level of carbon emissions and anticipated development, which will contribute towards the causes of climate change. In addition, it is also identified as an area of radiant energy and subject to serious water stress. Therefore, its adaptation towards climate change will provide opportunities to harness and threats to be addressed.
- 15.4 **A Compact Urban Borough:** The town was developed as a new town in the 1950s, and all development followed the neighbourhood principle which provides a sustainable pattern. This ethos is still central to the way the town is planned today and provides an increased opportunity for local energy production on a network basis. However, the compact nature of the borough and changing climate patterns are expected to increase the frequency and severity of heatwave events. Such events are likely to be of increased severity in Crawley due to the relatively high levels of radiant energy the area receives, combined with the urban heat island effect typical of compact urban areas.
- 15.5 **Water Stress:** The South East, including Crawley, is an area of serious water stress. It is among the worst areas in the UK. Therefore, more stringent water efficiency measures should be required from housing and commercial property development.
- 15.6 **Gatwick Diamond:** Crawley and its surrounds have been identified as an area of significant change and growth. Given its geographical location at the heart of the Gatwick Diamond and the significant amount of both commercial and residential growth expected throughout the life of the Local Plan, there is a need to consider the impact on the local environment and to plan for sustainable growth. This is exacerbated by the resultant in-commuting to the area and regional focus of growth that would otherwise be experienced across a number of authorities. This is also supported by the fact that the main commercial area, Manor Royal is currently responsible for 28% of the town's carbon emissions. This will increase if growth for the Gatwick Diamond area is focused in this area.
- 15.7 **Gatwick Airport:** Given the proximity of the international airport, there are a number of local impacts that would affect how climate change is dealt with. From the increase in traffic movements in the local area, to the restrictions in terms of building heights and consideration of potential future airport expansion, the operation of the airport requires the Local Authority to act differently than it would otherwise. For example, Crawley has a reduced opportunity of using wind turbines in the countryside adjacent to the airport and other renewable technologies must be considered. Gatwick Airport's published Scope 1 and 2 emissions contribute 24% of the business and commercial emissions in Crawley borough and 13% of total emissions (excluding aircraft movement, as these are considered on a national level).

- 15.8 Crawley Borough Council declared a Climate Emergency by a unanimous vote of Full Council on 17 July 2019. The motion declared that the council 'should commit to aim for zero carbon emissions as soon as possible and, in doing so, to encourage local residents and businesses to do the same'. The motion further included a pledge 'to aim to reduce carbon emissions generated by Crawley Borough Council activities by at least 45% by 2030 and to zero by 2050'. It included a commitment to work with 'other councils and partners to determine and implement best practice methods to reduce carbon emissions and so limit Global Heating to less than 1.5 degrees Celsius'<sup>125</sup>.

## Local Plan Policies

### Sustainable Design and Construction

- 15.9 The government has pursued progressive improvements to the environmental sustainability and energy efficiency of dwellings through changes to the building regulations and the development of national technical standards. The council has a long term aspiration to be carbon neutral by 2050 and, therefore, supports the introduction of national standards through Building Regulations. In line with the March 2015 Ministerial Statement, the council recognises Crawley as having the spatial characteristics in place that warrant the stipulation of specific policies in regard to energy and water efficiency and, in regard to water targets, to be able to trigger the use of the tighter operational standards<sup>126</sup>. The need to address climate change at a local level has also been supported throughout consultations for the Local Plan and in its evidence base.
- 15.10 Crawley's compact urban nature combined with the significant levels of development expected over the coming years present an opportunity for Crawley to minimise its carbon emissions in an efficient manner. Choices made in relation to the layout and scale of new development strongly influences energy consumption. Policies CL3 and CL4 in particular, require major new development use land more sustainably by integrating land uses and transport networks. Currently energy use in buildings makes up a significant portion of the carbon emissions generated within Crawley. Domestic buildings accounted for 22.7% of Crawley's overall emissions in 2018, and industrial and commercial buildings for 35.7%, with transport accounting for the remaining 41.6%<sup>127</sup>. Even before this energy has reached the consumer, energy wasted in the form of transfer and distribution losses has resulted in additional emissions. However, due to the borough's characteristics this wasted energy can be captured for the benefit of others, and this will result in Crawley's overall emissions being reduced.
- 15.11 Crawley was mainly constructed between 1950 and 1990, when sustainable development was not a priority, and many of the town's buildings consequently perform poorly in terms of their energy efficiency. Added to this fuel poverty has affected between one in twenty and one in twelve Crawley households between 2011-16. The improvement of existing buildings to ensure everyone has access to affordable warmth is, therefore, a high priority.
- 15.12 Actions to reduce emissions from energy use in buildings are most cost effective when undertaken during construction or renovation works. As such, development projects present the most appropriate and effective opportunity to mitigate the climate change impact of the borough. Therefore, the following hierarchy should be adopted by all development within the borough:

<sup>125</sup> 'Climate Emergency Declaration' (2019) CBC

<sup>126</sup> Planning Update March 2015: Written Ministerial Statement (March 2015)

<sup>127</sup> UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2018 (2020) Department for Business, Energy & Industrial Strategy (hereafter BEIS).



Be Lean – *use less energy*

Be Clean – *improve efficiency of energy supply*

Be Green – *use renewable and low carbon energy sources.*

This hierarchy is widely recognised, and reflects the fact that some aspects of a building’s environmental performance are more fundamental and harder to retrofit at a later date, while others are more amenable to change during the life of the building.

- 15.13 A number of objectives have been established that all developments are expected to achieve to ensure the borough remains a sustainable place in the coming years.

### Strategic Policy SDC1: Sustainable Design and Construction

The following requirements and standards set the strategic framework for the mitigation and adaptation of climate change as part of the development process within Crawley.

#### CLIMATE CHANGE MITIGATION

Development will be required to mitigate climate change in accordance with the following hierarchy:

<b>Be Lean</b>
<p>Where <b>new-build dwellings</b> may be subject to Part L of the 2013 Edition of the 2010 Building Regulations for the purposes of Building Regulations compliance, the relevant Target Emission Rate (TER) should be achieved using building fabric and energy efficiency measures alone.</p> <p>The <b>‘Be Green’</b> requirement set out below will require further emissions reductions, which may be achieved using low/zero carbon technologies.</p>
<p><b>Residential developments including 10 or more new homes or incorporating a site area of 0.5 hectares or more</b> will also be required to implement a recognised quality regime to ensure that ‘as built’ environmental performance matches the calculated design performance.</p>
<p><b>New buildings other than dwellings</b> which may be subject to Part L2A of the 2013 Edition of the 2010 Building Regulations for the purposes of Building Regulations compliance should achieve the relevant Building Emission Rate (BER) through fabric and energy efficiency measures alone.</p> <p>The <b>‘Be Green’</b> requirement set out below will require further emissions reductions, which may be achieved using low/zero carbon technologies.</p>
<p><b>Other developments</b> meeting the thresholds for submission of a Sustainability Statement (detailed below) should detail their consideration of the potential for building fabric and energy efficiency measures, and any specific measures proposed.</p> <p>These proposals will usually trigger building regulations requirements, and proposals for meeting these should be set out.</p>
<p><b>All developments</b> required to submit a Sustainability Statement should detail measures proposed to minimise the amount of carbon emitted throughout the implementation and construction process and to retain any existing embedded carbon onsite.</p>
<b>Be Clean</b>
<p>Developments should consider and respond to the potential to supply their energy needs, particularly for electricity, heating and cooling, by means of decentralised energy generation in accordance with <b>Policy SDC2</b>.</p>

## Be Green

**All developments** required to submit a Sustainability Statement should use renewable and low carbon energy technologies, where appropriate, or where required to meet specific emissions standards for new buildings. This should include use of available roof-space for solar PV where possible.

**New-build dwellings** will be required to meet whichever of the following standards is more efficient in respect of carbon dioxide emissions:

- a) a reduction of at least 19% against the Target Emission Rate (TER) set by the 2013 Edition of the 2010 Building Regulations (Part L);
- b) a new mandatory national emissions standard, introduced via Building Regulations or otherwise.

**New buildings other than dwellings** will be required to undergo BREEAM certification and achieve the 'minimum standards' for BREEAM Excellent within the Energy and Water categories, except where it is demonstrated that this is not technically feasible.

## CLIMATE CHANGE ADAPTATION

**All developments** required to submit a Sustainability Statement should contribute to the tackling of the serious water stress in the borough in accordance with **Policy SD3**.

**New dwellings, other new buildings, and material changes of use** (as defined by the Building Regulations) will be required to cope with future temperature extremes, and mitigate the potential of the development to increase the impact of heatwave effects, in accordance with the cooling hierarchy:

- Minimise internal heat generation through energy efficient design;
- Reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls;
- Design to enable passive ventilation (e.g. cross ventilation);
- Provide mechanical ventilation;
- Provide active cooling (ensuring they are the lowest carbon options).

## SUSTAINABILITY STATEMENT THRESHOLDS

All proposals involving the types of development listed below must be supported by a Sustainability Statement detailing the performance of the development against these requirements, including proposed approaches to achieving relevant Building Regulations requirements, and the avoidance of overheating:

- Creation of a dwelling (including by conversion);
- Creation of 100sqm or more of new-build floorspace;
- Extension of a building which already comprises 1000sqm or more;
- The following changes of use, where cumulatively affecting 100sqm or more:
  - Non-E-class to E-class;
  - Non-C-class to C-class;
  - Non-F-class to F-class.

Further details on how these objectives can be addressed can be found in the Planning and Climate Change SPD.

## Reasoned Justification

15.14 *The NPPF highlights the need for planning to address and adapt to climate change, encourage the transition to a low carbon future, reduce greenhouse gas emissions, and support renewable and low carbon energy<sup>128</sup>. In addition, it also requires local*

<sup>128</sup> National Planning Policy Framework, paragraphs 148-151 (2019) MHCLG

*plans to pursue ‘opportunities for net gains’ across the economic, social and environmental objectives which define sustainable development<sup>129</sup>.*

- 15.15 *A number of borough-wide issues and opportunities have been identified in the evidence base and these form the objectives that all development is expected to address in this Policy.*
- 15.16 *In accordance with the ‘Be Lean’ element of the energy hierarchy, the Policy requires development to take an active approach to minimising a development’s need to consume energy. This is paramount to tackling climate change and intrinsically linked with the NPPF. It also reflects the government’s understanding – set out in the Future Homes Standard consultation – that primary energy consumption will increasingly become the key metric for new buildings, as emissions move closer to net zero<sup>130</sup>.*
- 15.17 *The construction of new buildings represents the best and most economical opportunity to achieve advanced standards in energy efficiency. In recognition of this the Policy requires new buildings to be designed so as to be capable of meeting current Building Regulations emissions standards even before any low or zero carbon technologies have been included in the design. In order to address the recognised ‘performance gap’ between the modelled performance of buildings and their actual performance, the policy further requires applications for major residential developments to demonstrate that they have acted to ensure that sustainability and construction standards specified at the design stage are carried through in the implementation of the development.*
- 15.18 *Existing buildings within the borough are responsible for a large proportion of carbon emissions so improvements to all of these buildings are essential to curb Crawley’s emissions over the Plan period. Therefore, the Policy requirement to consider and detail energy efficiency measures relates to all developments meeting certain thresholds, including alterations and extensions to existing buildings. This will also help to tackle the high level of local fuel poverty by ensuring affordable warmth within the borough.*
- 15.19 *Existing buildings contain embedded carbon; this is carbon that was emitted to construct it. It is vital that this already emitted carbon is not wasted through the needless demolition of structures so applications will be required to demonstrate how onsite embedded carbon has been retained.*
- 15.20 *Due to Crawley’s compact urban nature, the use of district energy networks as part of the ‘Be Clean’ element of the energy hierarchy, can ensure a low carbon future for the borough as required by the NPPF. Ensuring development utilises these networks is of particular importance to ensure they are a success.*
- 15.21 *Crawley Borough Council has assessed<sup>131</sup> the likely opportunities and constraints of a number of technologies across the borough. High radiant energy, a plentiful supply of a biomass fuel, and district energy networks have been identified as the most suitable renewable energy resources available. Therefore, renewable and low carbon energy technologies should be utilised where appropriate.*
- 15.22 *In order to provide a focus for climate change mitigation measures within new developments, the policy sets out baseline environmental performance standards as part of the ‘Be Green’ element of the energy hierarchy. New-build dwellings will be required to achieve standards for CO<sub>2</sub> emissions equivalent to Level 4 of the discontinued Code for Sustainable Homes, pending the introduction of a more stringent Future Homes Standard, which is to be introduced by 2025 as part of the*

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<sup>129</sup> National Planning Policy Framework, paragraphs 8 and 32 (2019) MHCLG

<sup>130</sup> The Future Homes Standard - 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings (2019), MHCLG.

<sup>131</sup> Decentralised Energy Study (2011) HurleyPalmerFlatt

government's 'mission to at least halve the energy use of new buildings by 2030'<sup>132</sup>. The Code Level 4 equivalent represents a recognised standard which is consistent with the Ministerial Statement of 25 March 2015, and with the government's policy for national technical standards<sup>133</sup>. New non-residential buildings are meanwhile required to meet the minimum standards for BREEAM 'excellent' within the Energy category.

- 15.23 *The Policy further provides a framework for adaptation to the effects of climate change. The borough is identified as falling within an area of serious water stress and as such development is expected to address this issue by achieving a better than standard level*<sup>134</sup>.
- 15.24 *Crawley is also expected to experience increased frequency and severity of heatwave events. Therefore, ensuring that new buildings will be fit for purpose under greater temperature extremes and minimising the contribution that new developments have towards the urban heat island effect will help manage this impact.*
- 15.25 *This Policy will make a substantial contribution to addressing the requirements set out in the NPPF in respect of climate change, thereby contributing towards the social and environmental objectives defining sustainable development. It will also positively contribute towards the economic objective, as buildings with better environmental performance will have lower energy costs, reduced requirements for retrofitting arising from tighter regulations in the future, and increased marketability*<sup>135</sup>. They will also promote investment and employment opportunities in green industries.

### **District Energy Supply**

- 15.26 A large proportion of Crawley's energy is currently supplied from the National Grid as a centralised system. Power stations generate and distribute this energy across long distances to homes and businesses. This is an inefficient and carbon intensive process due to waste heat and distribution losses. Thus only 45 per cent of the energy used to generate electricity in the UK in 2017 reached end users in the form of electricity<sup>136</sup>. At the same time, nearly half of the energy used in the UK is for heating<sup>137</sup>. Therefore, the use of waste heat from electricity production can help shift energy supply to more affordable lower carbon sustainable sources.
- 15.27 District Energy Networks are designed to distribute energy, such as heating, cooling and electricity across a local area. Networks typically consist of underground pipes and/or cables connecting local energy sources to buildings. Energy sources can include plant that generates electricity and uses the waste heat from this process to supply the network. This is known as Combined Heat and Power (CHP) and is a form of efficient "decentralised" energy production. District Energy Networks can be supplied with many fuel sources, including renewables or waste heat. Energy supplies to District Energy Networks can, therefore, be flexible in regard to using different sources and different technologies both now and in the future.
- 15.28 Crawley, due to its relatively dense and compact urban character, its neighbourhood-based layout, and the quantity of new development expected over the coming years has a significant opportunity to develop District Energy Networks. Such networks

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<sup>132</sup> The Future Homes Standard (2019), MHCLG.

<sup>133</sup> Planning Update March 2015: Written Ministerial Statement, March 2015; Government Response to the draft Revised National Planning Policy Framework consultation, p.48 (2018) MHCLG

<sup>134</sup> Water Stressed Areas – Final Classification (July 2013) Environment Agency

<sup>135</sup> The Business Case for Green Building: A Review of the Costs and Benefits for Developers, Investors and Occupants (2013) World Green Building Council; Capturing the value of sustainability: Identifying the links between sustainability and business value (2018) UK Green Building Council

<sup>136</sup> Digest of UK Energy Statistics (DUKES) 2018, p.112 (2018) BEIS

<sup>137</sup> Energy Consumption in the UK (ECUK) 2018, Data Table 1.04 (2018) BEIS

could provide affordable warmth to residential and commercial buildings, tackling fuel poverty and improving the borough's energy security. Studies commissioned by the council and other stakeholders have identified a number of Priority Areas within the borough where District Energy Networks are likely to be most viable in the short term<sup>138</sup>. Other strategic developments also provide significant opportunities for the development and implementation of District Energy Networks.

## Policy SDC2: District Energy Networks

The development of district energy networks and associated infrastructure is encouraged and should be approved unless it results in significant adverse impacts on the environs.

Priority areas for the delivery of District Energy Networks (DEN) are identified on the Local Plan Map.

Any major development within the borough, and all development proposals within a priority area for District Energy Networks that would involve the creation of a new dwelling or the creation of over 1000sqm of internal floorspace, must incorporate an energy strategy developed in accordance with the following hierarchy:

- i. where a network is in place in the immediate area: connect to an existing District Energy Network;
- ii. where a network is not yet in place:
  - a) incorporate within the development a system for supplying energy to any surrounding existing or planned buildings. Any system installed should be compatible with a wider district energy network and developments should ensure that connection to a wider network is facilitated in the future through good design and site layout; or
  - b) include site-wide communal energy systems; or
  - c) demonstrate that the development will be “network ready”, i.e. optimally designed to connect to a District Energy Network on construction or at some point after construction.
- iii. where a development has demonstrated that the preceding options cannot be achieved, due to technical feasibility, or due to site or development specifics, an alternative approach to incorporating low- or zero-carbon technology energy may be justified, on a case-by-case basis. These developments will be required to supply a proportion of their energy needs from low- or zero-carbon sources located on or near the site as follows:
  - a) For major developments within a DEN priority area: at least 20%;
  - b) For major developments outside a DEN priority area, or minor developments within a DEN priority area including the creation of a new dwelling: at least 10%.

Where a connection to an existing District Energy Network is proposed, the council may secure the implementation of this by means of a planning obligation.

All development within the categories identified above must be supported through the submission of a Sustainability Statement in compliance with the Planning and Climate Change SPD.

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<sup>138</sup> Decentralised Energy Study (2011) HurleyPalmerFlatt; BISEPS Re-Energise: Strategic Energy Opportunities (West Sussex County Council and Manor Royal Business District, 2018); Crawley Civic Centre DHN Concept Design Report (Ramboll, 2018).



### **Reasoned Justification**

15.29 *Crawley Borough Council has conducted a thorough assessment of the potential use of decentralised energy networks across the borough. This has included work by West Sussex County Council, the Energy Centre for Sustainable Communities, and HurleyPalmerFlatt consultancy.*

15.30 *When considering the opportunities for reducing CO<sub>2</sub> emissions through the supply of low carbon heat, District Heating (DH) was identified as an alternative method of supplying heat to buildings, using a network of super insulated pipes to deliver heat to multiple buildings from a central heat source, such as a Combined Heat and Power (CHP) plant. A CHP plant is essentially a local, smaller version of a traditional power station but by being combined with heat extract, the overall efficiency is much higher (typically 80% - 85%). Whilst the electrical efficiency of smaller CHP systems is lower than large scale power generation, the overall efficiencies with heat use are much higher resulting in significant CO<sub>2</sub> reductions.*

15.31 *A 'heat map' for Crawley has been created that identifies density of heat demand across the borough, the assessment identified a number of areas where the development of district heating schemes should be actively encouraged:*

- *Town Centre/Three Bridges corridor: the council is taking advantage of opportunities in this area, including through the creation of a new energy centre on the Town Hall site which will supply heat and power to a number of nearby developments and locations.*
- *Manor Royal: there is high demand for process heating/cooling as well as space heating in this area and potential to generate and supply low/zero carbon energy locally is being pursued by local stakeholders and businesses as part of the Re-Energise Manor Royal project.*
- *Forge Wood: there is network potential within this area due to proposals for additional large-scale development and possible linkages with Manor Royal.*
- *K2 Leisure Centre and Land Adjacent to Desmond Anderson Primary School: there is potential to expand the Combined Heat and Power provision at K2 to supply heat and power to the adjoining allocated housing site.*
- *In addition, Policy EC4 allocates land at Gatwick Green, for the development of a Strategic Employment Location predominantly comprising industrial (B2) and storage and distribution (B8) floorspace. This strategic allocation provides a significant opportunity for the masterplanning of energy generation and consumption, notably through potential for the decentralised supply of heat, cooling and electricity.*

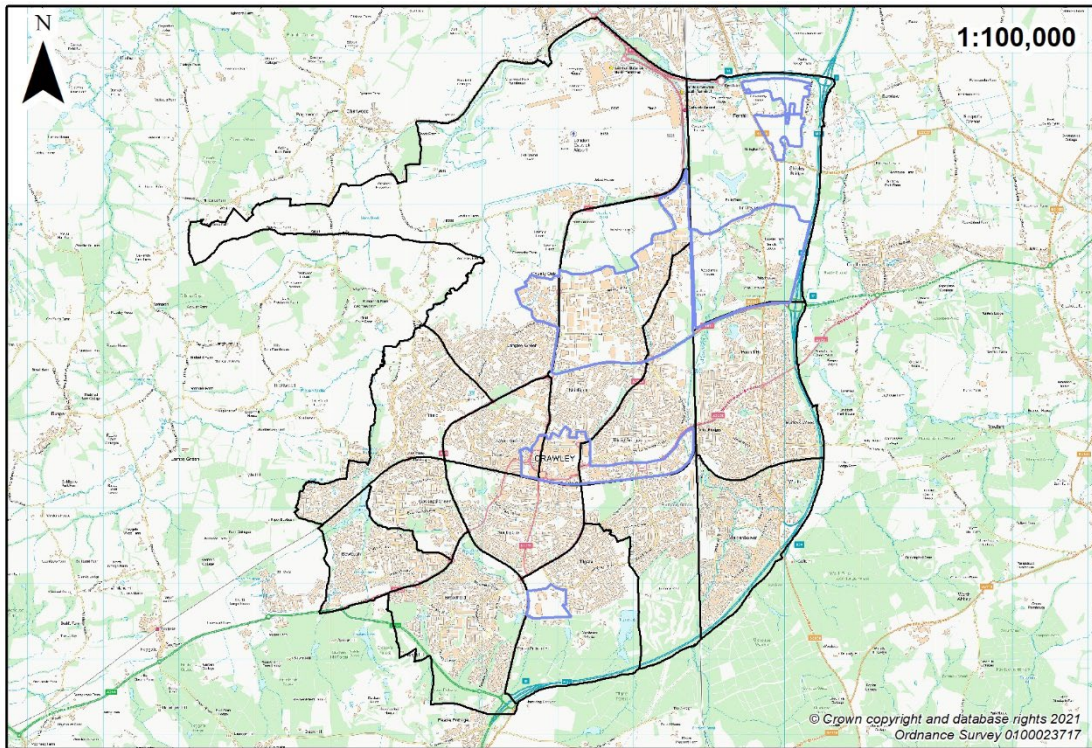
*These areas are identified as Priority Areas on the Local Plan Map. However, District Energy Networks are encouraged throughout the borough, including outside of the identified areas.*

15.32 *The NPPF directs local plans 'to identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy systems'. This further applies to the goal of 'co-locating potential heat customers and suppliers'. Further, local planning authorities should 'expect new developments to comply with any development plan policies on local requirements for decentralised energy supply, unless it can be demonstrated by the applicant, having regard to the type of development involved, that this is not feasible or viable'<sup>139</sup>. Given the complexity of decentralised energy, the council encourages early pre-application discussions.*

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<sup>139</sup> National Planning Policy Framework, paragraphs 151 and 153 (2019) MHCLG

- 15.33 *The approach of seeking to make new dwellings capable of connecting to future DENs is consistent with the approach outlined in the government’s Clean Growth Strategy of April 2018, which announces the intention ‘to consult on strengthening energy performance standards for new and existing homes under building regulations, including futureproofing new homes for low carbon heating systems’.*



 Priority Areas for District Energy Networks (Policy SDC2)

## Tackling Water Stress

- 15.34 The South East, including Crawley, is an area of serious water stress<sup>140</sup>. Water stress is a measure of the level of demand for water (from domestic, business and agricultural users) compared to the available freshwater resources. It can cause deterioration of the water environment in both the quality and quantity of water, and consequently restricts the ability of a waterbody to achieve ‘good’ status under the Water Framework Directive.
- 15.35 Changing climate conditions are expected to further aggravate water stress in Crawley. Drought is expected in increased frequency and severity and will put additional strain on reservoir and groundwater levels. Extreme rainfall events are also expected to become more frequent and to be more severe. Although seemingly counter-intuitive: increased risk of extreme rainfall can actually further aggravate water stress as most of this water does not soak through to recharge groundwater reserves but instead becomes surface water run-off – increasing the risk of flooding.
- 15.36 Water efficiency measures can make a significant contribution to the reduction of water stress. Southern Water, South East Water and Sutton & East Surrey Water are responsible for water supply in Crawley. In response to the severe water stress, Southern Water has committed through its Water Resource Management Plan to ‘Target 100’, an objective of achieving a per capita consumption of 100 litres per person per day (l/p/d) by 2040. This approach is more ambitious than the Building Regulations optional target of 110 l/p/d, and is supported by the other water supply

<sup>140</sup> Water Stressed Areas – Final Classification (July 2013) Environment Agency

companies serving Crawley, and the Environment Agency. The Local Plan supports this pro-active approach to meeting the challenge of water stress.

### Policy SDC3: Tackling Water Stress

Crawley is situated within an area of serious water stress. Therefore, development should plan positively to minimise its impact on water resources, including protecting against deteriorating water quality, and promote water efficiency.

Proposals involving the creation of residential dwellings will be required to meet an advanced water efficiency standard of 100 litres/person/day. This standard will be required unless superseded by any tighter national standard introduced during the Local Plan period that is applicable in an area of serious water stress.

New non-residential buildings will be required to meet the minimum standards for BREEAM 'Excellent' within the Water category.

Non-residential extensions and changes of use which are required to submit a Sustainability Statement in accordance with Policy SDC1 will be required to achieve water efficiencies equivalent to the minimum Water standards for BREEAM 'Excellent', unless this is shown to be unfeasible.

Applicants must demonstrate how they have achieved the requirements of this Policy within their Sustainability Statement as required by Policy SDC1.

#### **Reasoned Justification**

- 15.37 *The NPPF requires local planning authorities to take 'a pro-active approach to mitigating and adapting to climate change, taking into account the long term implications for... water supply'<sup>141</sup>. Ensuring that new development is highly water efficient and that, where appropriate, it makes use of rainwater harvesting and/or grey water recycling for uses which do not require water to be potable (such as WC flushing), will help to minimise the impact of development on water stress in the region.*
- 15.38 *The Environment Agency defines a water stressed area as a location where 'the current household demand for water is a high proportion of the current effective rainfall which is available to meet that demand or where the future household demand for water is likely to be a high proportion of the effective rainfall available to meet that demand'. Crawley Borough Council is one of many local authorities in the country to have declared a climate emergency. Climate change is predicted to increase pressure on water resources, increasing the potential for a supply-demand deficit in the future, and making environmental damage from over abstraction of water resources more likely. The delivery of water and wastewater services and the heating of water in the home require high energy inputs, and water efficiency can reduce energy use and carbon emissions. It is equally important that development does not cause an unsustainable increase in water abstraction.*
- 15.39 *Crawley's water supply is largely provided by Southern Water, and the borough is located within its Sussex North supply area. During certain supply conditions, groundwater abstraction at Hardham in Horsham District makes a significant contribution to Crawley's supply. Natural England has advised that based on recent evidence, an adverse effect on the integrity of the Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar features could not be excluded with certainty. The Environment Agency and Natural England are working with Southern Water to try to identify a long term more sustainable water supply. In the meantime, whilst the adverse effect remains or is uncertain,*

<sup>141</sup> National Planning Policy Framework, paragraph 149 (2019) MHCLG

development in the Sussex North part of the Gatwick sub-region must be certain not to add to this adverse effect. The council will continue to engage with Southern Water in relation to groundwater extraction at Hardham, and will retain its ongoing relationships with water infrastructure companies, providing an annual profile of projected growth to support them in planning for the provision of sufficient water supply and infrastructure.

- 15.40 *Crawley's planning policy on water efficiency requires all new dwellings, including the subdivision of existing buildings into multiple dwellings, to achieve stringent water efficiency requirements, recognising that it is an area of serious water stress and reflecting the ambitions of the council and water supply companies to respond to this challenge. The current optional requirement set out in Building Regulations<sup>142</sup> is 110 l/p/d (105 l/p/d with an additional 5 l/p/d for external use). However, the Building Regulations were last updated some time ago, and are designed to apply nationally. They do not specifically take into account the situation in the South East nor the particular circumstances in the Sussex North Water Resource Zone. Given the pressing issue of water stress, the Gatwick Water Cycle Study, with support from the Environment Agency, makes a clear recommendation that a tighter water efficiency standard, of at least 100 l/p/d, is considered the necessary level for Crawley. However, given the significant water supply challenges faced in Sussex North Water Resource Zone, and the potentially significant ecological impacts of groundwater abstraction at Hardham, Crawley is working with other local authorities, Southern Water, Environment Agency and Natural England to assess the in-combination impacts of planned growth, and to consider, having regard to technical feasibility and viability, if greater water efficiency standards (tighter than 100l/p/d) is required to achieve water neutrality.*
- 15.41 *This can be achieved in a number of ways, from reducing the water demand from new houses, through to achieving "water neutrality" in a region by offsetting a new development's water demand by improving efficiency in existing buildings. The 100 l/p/d target can be achieved at minimal cost through a 'fittings approach' to compliance with the 110 l/p/d standard, but with the additional measure of a shower flow rate reduced from 8 litres per minute down to 6 litres per minute. The additional cost of implementing this specification, going beyond the 110 l/p/d target to achieve consumption of 100 l/p/d would be just £14 per dwelling<sup>143</sup>. Other sustainability measures can be incorporated into development to contribute towards the achieving of water neutrality, including water efficiency measures for taps and toilets, reduced volume baths, rainwater harvesting and grey water recycling.*
- 15.42 *For non-domestic development there is currently no nationally applied standard for water efficiency of buildings (only minimum performance requirements for individual water using fixtures). However, BREEAM sets out standards for minimum water performance of such buildings. This is done using the BREEAM water calculation method to assess the percentage reduction in internal potable water usage of the proposed building performance as compared to that of a notional building, using standardised assumptions for occupant behaviour.*
- 15.43 *Given the findings of the council's Water Cycle Studies and the work undertaken in partnership with the Environment Agency as an area of serious water stress, non-domestic developments are required to install water meters and to meet the highest water efficiency requirements. The Policy requires non-residential development to equal or exceed BREEAM Excellent requirements, which require that there is a 25% reduction in potable water use.*

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<sup>142</sup> Building Regulations Approved Document G (Sanitation, Hot Water Safety and Water Efficient)

<sup>143</sup> Housing Standards Review (2014), Department for Communities and Local Government

- 15.44 *The EU Water Framework Directive<sup>144</sup> establishes a framework for the protection of inland surface waters (rivers and lakes), transitional waters (estuaries), coastal waters and groundwater. The government has stated that the environmental protections arising from this and other EU legal instruments will remain in place after the UK leaves the European Union, and the 2018 '25 year Environment Plan' has announced the intention to improve 'at least three quarters of our waters to be close to their natural state as soon as practicable'<sup>145</sup>. The council supports this work through the proper and sensible management of water in all new development.*
- 15.45 *The council will continue to work alongside developers, key stakeholders and the Environment Agency with regard to water supply and demand considerations, as well as any infrastructure requirements, and will assist in ensuring that the highest standards for water efficiency are considered for all development within the borough. Further information is provided in the Planning and Climate Change SPD.*

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<sup>144</sup> The Water Framework Directive, European Union (Directive 2000/60/EC of the European Parliament and of the European Council of 23 October 2000)

<sup>145</sup> A Green Future: Our 25 Year Plan to Improve the Environment, p.25 (2018) Department of the Environment, Food and Rural Affairs



## Environmental Protection

- 16.1 Crawley is distinct in comparison to other districts and boroughs in the sub-region. It is mainly urban in character, is well linked to the motorway network, and contains a major international airport at Gatwick. The borough is home to one of the largest employment areas in the south east at Manor Royal and County Oak. These attributes have contributed to Crawley becoming a leading economic driver in the sub-region, and a focus for growth, but can also result in pollution impacts which need to be mitigated and managed. With further economic and residential growth required to meet identified needs over the Plan period to 2037, it is vital that development is carefully and sustainably planned with the environment in mind.

### Chapter Content

- 16.2 The NPPF is clear that planning policies and decisions should contribute to and enhance the natural and local environment, including by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by soil, air, water or noise pollution. This chapter sets out policies to guide the relationship between development and local, national and global environmental protection requirements. At its heart is the objective to ensure that new and existing development does not contribute to, nor that it is put at unacceptable risk from or adversely affected by, unacceptable levels of flood risk or pollution.

### The Key Issues

- 16.3 Like many urban areas, Crawley is home to major transport hubs and networks, industrial and commercial uses, as well as more sensitive uses including residential areas, green infrastructure, and also countryside outside the built up area boundary. It is important that the relationship between different land uses is appropriately managed, and that development is carefully planned, to ensure that it does not result in, nor expose its users to, unacceptable environmental impacts.
- 16.4 Crawley is fortunate in having few areas that are subject to serious environmental or pollution issues, though the predominantly urban nature of the borough, and the variety of different land uses within it, means that the relationship between development and the environment is an important consideration in planning decisions.
- 16.5 Flood risk is a key issue for Crawley. Falling entirely within the River Mole catchment, parts of the borough are significantly affected by fluvial flood risk, but flood risk can come from a range of other sources including surface water (pluvial), sewer and ground water. High profile flood events serve as a reminder of the need to appropriately manage flood risk, and it is vital that development is planned with flood risk in mind, both in terms of protecting users of development, and ensuring that development does not unacceptably increase flood risk elsewhere.
- 16.6 The presence across the borough of a range of other noise generating uses, and also noise-sensitive uses, means that the relationship of development and noise must be carefully managed. Aviation noise is a significant consideration, with a large extent of the borough falling within the noise contours of Gatwick Airport. Noise from surface transport can also be significant, with the M23 motorway located to the east of Crawley and a number of busy roads running within the borough. Given the

borough's significant economic function, noise from commercial and other sources must also be taken into account.

- 16.7 Air Quality is a significant issue in places, particularly in areas where surface transport is concentrated. This is recognised through the designation of Hazelwick Air Quality Management Area (AQMA) in 2015, with plans in place to extend this area following recent exceedances of the annual objective for Nitrogen Dioxide close to Three Bridges Station. Pollution can also take other forms, including land based contamination which can be harmful to the environment and sensitive uses, and the effect of light pollution which can be harmful to the night-time environment and may have an urbanising effect that undermines amenity and setting if not carefully designed.
- 16.8 It is important that development protects, and where possible, improves the environment and amenity of existing and future residents and occupiers of land. To address these issues and ensure they are not worsened, development will be required to demonstrate that it will not give rise, or be subject to pollution that would cause unacceptable harm to health, safety, quality of life, amenity, biodiversity or the environment. Where development is likely to generate significant pollution impacts, the council will require that the impacts are minimised and/or mitigated to an acceptable level. Through the policies set out in this Chapter, the relationship between development and environmental factors will be appropriately managed to ensure that the sustainability objectives of the Crawley Vision are met.

## Local Plan Policies

### Development and Flooding

- 16.9 Crawley's water environment is an important planning consideration, particularly from the perspective of managing flood risk, and will continue to remain so in planning for Crawley's future. The borough falls entirely within the upper reaches of the River Mole catchment, and the town's location within the catchment has meant that several areas are identified as being at risk of flooding. The northward flow of the Upper Mole towards the Thames also has flood implications for Gatwick Airport and neighbouring authorities, in particular Reigate and Banstead Borough. River (fluvial) flooding is not the only source of flooding; Crawley is at the highest risk of surface water (pluvial) flooding in West Sussex. Sewer and groundwater flooding are also important planning considerations.
- 16.10 It is vital that development is planned sustainably with flood risk from all sources in mind to protect the current and future users of development, and ensure that development does not increase flood risk elsewhere. The NPPF and supporting PPG: *Flood Risk and Coastal Change* categorise different development types according to their vulnerability to flood risk, and the extent to which these uses are compatible or otherwise with the level of flood risk at the development site. Through applying the sequential test, and where required the exception test, the most vulnerable development types should be directed to the areas of lowest flood risk.

### Policy EP1: Development and Flood Risk

Development must avoid areas which are exposed to an unacceptable risk from flooding, and must not increase the risk of flooding elsewhere. To achieve this, development will:

- i. be directed to areas of lowest flood risk having regard to its compatibility with the proposed location in flood risk terms, and, where required, demonstrating that the sequential and exceptions tests are satisfied;
- ii. where located in Flood Zones 2 or 3, and for all major development in Flood Zone 1, demonstrate through a Flood Risk Assessment how appropriate mitigation

- measures will be implemented to ensure that over the lifetime of the development and taking climate change into account, that flood risk is acceptable on site, and is not increased elsewhere as a result of the development;
- iii. demonstrate that peak surface water run-off rates and annual volumes of run-off will be reduced through the effective implementation, use and maintenance of SuDS, unless it can be demonstrated that these are not technically feasible or financially viable;
  - iv. make appropriate provision for surface water drainage to ground, water courses or surface water sewers. Surface water will not be allowed to drain to the foul sewer;
  - v. not be permitted to take place within 8 metres from the top of any Main River or 12 metres from any Ordinary Watercourse without prior consent from the Environment Agency, nor within 3 metres of any Thames Water sewer system without prior consent from the sewerage undertaker;
  - vi. post construction, provide to the council certification of the drainage works from a third party professional. This should not be the consultant who designed the drainage features. This will be to ensure that the drainage details and design submitted for planning application has been constructed in line with the submitted documents.

### **Reasoned Justification**

- 16.11 *Flooding is a natural process that can happen at any time in a wide variety of locations, potentially posing a risk to life, property and livelihoods. The risk of flooding posed to properties within Crawley arises from a number of sources including river flooding, localised runoff and sewer flooding.*
- 16.12 *Development has the potential to increase the likelihood of flood risk if it is not carefully planned and managed. There are areas which are particularly at risk from fluvial flooding as Crawley is crossed by a number of designated main river watercourses that form part of the River Mole catchment. Climate change, and the predicted alterations to weather patterns this will bring, will place additional need to ensure development can be considered as safe for its lifetime. Therefore, to ensure that people and places are not exposed to unacceptable flood risk, it is essential that planning decisions are informed by, and take due consideration of, the flood risk posed to (and by) development.*
- 16.13 *Flash flooding from surface water run-off is frequently an issue across the borough following heavy localised rainfall events. It is a specific issue in Crawley as the underlying clay soil and density of urban development reduces permeability and increases the levels and speed of surface water run-off. This can result in localised surface flooding, and can lead to rivers exceeding their storage capacity more quickly, often resulting in 'flash flooding'. It is the responsibility of the developer to make proper provision for surface water drainage to ground, water courses or surface water sewers. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.*
- 16.14 *The NPPF requires local planning authorities to take a pro-active approach to managing impacts associated with climate change, including flood risk. The risk of a flood event is a function of both the probability that the flood will occur and the consequence to the community as a direct result of the flood. To minimise risks to property, development should be avoided in areas which are at greatest risk of flooding, and directed to sequentially preferable areas of lowest risk. Where, having applied the sequential test, it is not possible for development to be located in areas of lower flood risk, then the NPPF exceptions test should be applied and satisfied.*
- 16.15 *To guide the location of development, Planning Practice Guidance: Flood Risk and Coastal Change (DCLG, 2019) identifies the different levels of flood risk, ranging*

from Flood Zone 3b (functional floodplain), the land at greatest probability of flooding to Flood Zone 1, the lowest probability. Table 2 of the Planning Practice Guidance categorises different development types according to their vulnerability to flood risk, with Table 3 outlining which development types are suitable within each flood zone.

- 16.16 To identify the extent to which land is at risk of flooding, applicants will be required to refer to the Strategic Flood Risk Assessment (SFRA, 2020). Based on the SFRA mapping, Crawley is delineated into the following Flood Zones:
- **Flood Zone 1:** Low probability: less than a 0.1% chance of river and sea flooding in any given year
  - **Flood Zone 2:** Medium probability: between a 1% and 0.1% chance of river flooding in any given year or 0.5% and 0.1% chance of sea flooding in any given year
  - **Flood Zone 3a:** High probability: greater or equal to a 1% chance of river flooding in any given year or greater than a 0.5% chance of sea flooding in any given year. Excludes Flood Zone 3b.
  - **Flood Zone 3b:** Functional Floodplain: land where water has to flow or be stored in times of flood. The identification of functional floodplain set out in the SFRA takes account of local circumstances and has been agreed with the Environment Agency. Only water compatible and essential infrastructure are permitted in this zone and should be designed to remain operational in times of flood, resulting in no loss of floodplain or blocking of water flow routes. Flood Zone 3b is defined as land within the defended 5% AEP flood extent but excludes land within existing building footprints.
- 16.17 The SFRA mapping is based on the most recent (2020) update of the Environment Agency River Mole modelling, though does inevitably represent a point in time. To ensure that the most up-to-date information is considered, applicants should refer, in addition to the SFRA, to the most recent Environment Agency Flood Map for Planning, and should consult with Environment Agency and Lead Local Flood Authority to understand if more recent data is available.
- 16.18 The NPPF designates residential development as a 'more vulnerable' use which should be directed to Flood Zone 1 in the first instance, and then Flood Zone 2, subject to demonstrating compliance with the sequential test and the acceptability of development through a site-specific Flood Risk Assessment. The Flood Risk Assessment will need to demonstrate how flood risk will be managed now and over the development's lifetime, taking climate change into account and with regard to the vulnerability of its users. Residential development on land falling within Flood Zone 3a will only be acceptable where it can be demonstrated through a site-specific Flood Risk Assessment, that firstly the requirements of the sequential test are met, and secondly that the exception test is satisfied.
- 16.19 All housing sites identified in Local Plan Policy H2 are considered to be appropriate locations in terms of flood risk. This assessment follows early engagement on the Local Plan with the Environment Agency and West Sussex County Council (WSCC). Of the sites allocated by the Local Plan for residential development, two are situated in areas partially affected by Flood Zone 2 and/or Flood Zone 3a; these being: Henty Close, Bewbush and Land adjacent Desmond Anderson, Tilgate. Land West of Balcombe Road/Street Hill, Pound Hill South and Worth, identified as a housing, biodiversity and heritage site, is subject to a small area of Flood Zones 2 and 3. The principle of residential development at each of these sites is accepted, subject to applicants demonstrating, through a Flood Risk Assessment, that the development has been carefully planned to ensure it is acceptable in terms of flood risk.
- 16.20 West Sussex County Council (WSCC) is the Lead Local Flood Authority (LLFA), meaning it is a statutory consultee on planning applications where flood risk is a

consideration. In its capacity as LLFA, WSCC has published West Sussex Lead Local Flood Authority Policy for the Management of Surface Water (updated November 2018), which sets out the requirements for drainage strategies and surface water management provisions associated with applications for development. In responding to flood risk as part of the planning application process, applicants should meet the requirements set out by WSCC, demonstrating the extent, position, function and future management arrangements for the sustainable drainage system for a proposed site. This information will be required for all development, except for those development types identified within Local Plan Policy EP2 and at Paragraph 16.17, and should be submitted to the Local Planning Authority at the time that an application is made. Further guidance is provided in the SFRA (2020) and the Climate Change Supplementary Planning Document.

- 16.21 *The provision of buffer strips is important in preserving watercourse corridors, flood flow conveyance and for future watercourse maintenance and improvement. It also enables the avoidance of disturbing ecology and the structural integrity of riverbanks. The buffer distances set out in the Policy are to ensure the preservation of the watercourse corridor, wildlife habitat, flood flow conveyance and future watercourse maintenance or improvement.*
- 16.22 *Whilst individual development with appropriate site mitigation measures should not result in measurable local effects with respect to hydrology and flood risk, the cumulative effect of multiple development may be more severe at downstream locations in the catchment. Development should therefore incorporate Sustainable Drainage Systems (SuDS) to manage surface water, with the primary aim of reducing flood risk. SuDS represent the most effective approach to reducing flood risk for relatively high intensity, short and medium duration events, and are particularly important in mitigating potential increases in surface water flooding, sewer flooding and flooding from small and medium sized watercourses resulting from development. SuDS can deliver wider sustainability benefits, enabling surface water to be collected for use in homes and gardens, adaptation to climate change through recharge of the watercourse and underlying aquifers, and biodiversity and habitat enhancements. Use of SuDS can also support the management of diffuse pollution generated by urban areas through the sequential treatment of surface water, reducing the pollutants entering lakes and rivers, resulting in lower levels of water supply and wastewater treatment being required. This treatment of diffuse pollution at source can contribute to meeting Water Framework Directive water quality targets, as well as national objectives for sustainable development.*
- 16.23 *Scope may exist to incorporate natural flood management approaches to protect, restore and re-naturalise the function of catchments and rivers to reduce flood risk by emulating the natural regulating functions of catchments, rivers, and floodplains. A wide range of techniques can be used that aim to reduce flooding by working with natural features and processes in order to store or slow down flood waters, including offline storage areas, restoration of rivers or removal of redundant structures, re-meandering streams, targeted woodland planting, and reconnection and restoration of functional floodplains.*

### **Flood Risk Guidance for Householder Development and Small Non-Residential Extensions**

- 16.24 Some existing residential dwellings and non-residential buildings in Crawley are situated in areas of flood risk, falling within Flood Zone 2 (medium probability), Flood Zone 3a (high probability) or Flood Zone 3b (functional floodplain). It is recognised that the occupiers of these properties may seek to apply for planning permission to undertake small-scale development that is associated with the use of the existing building, such as householder applications, or small ground floor extensions. This



type of development, though of a relatively small-scale, still has potential to take up flood storage, and will itself be vulnerable to flooding.

- 16.25 In these situations, it is recognised that a detailed Flood Risk Assessment would not be proportionate to the nature and scale of development being proposed. Therefore, for the development typologies identified in Policy EP2, and defined at paragraph 16.27, a proportionate Flood Risk and Resilience Statement will be required to support planning applications. This will be required to demonstrate how any lost flood storage will be mitigated, and how the proposed development will be made resilient in flood risk terms.

### **Policy EP2: Flood Risk Guidance for Householder Development, Small Non-Residential Extensions**

Within Flood Zone 2 (medium probability), Flood Zone 3a (high probability) and Flood Zone 3b (functional floodplain) a detailed Flood Risk Assessment will not be required for:

- i. Householder development
- ii. Minor non-residential extensions with a footprint of less than 250m<sup>2</sup>
- iii. Minor alterations to property.

Instead, a Flood Risk and Resilience Statement must be provided. This will be required to, on a proportionate basis, demonstrate how:

- i) any loss of flood storage resulting from the development will be appropriately mitigated; and
- ii) the development has been designed to ensure that, over its lifetime and taking climate change into account, it is resilient to the level of flood risk posed.

### **Reasoned Justification**

- 16.26 *Some existing buildings within Crawley Borough are situated within Flood Zones 2 and 3a/b, and are, therefore, subject to an existing level of flood risk. In individual cases where small-scale development is proposed to existing buildings that are already affected by flood risk, this is unlikely to result in a significant increase in flood risk. However, cumulatively, such developments will have an overall impact of reducing flood storage capacity in the borough, unless carefully planned to ensure that any loss of flood storage is appropriately mitigated. Equally, it is recognised that the development proposed will, as is the case for the existing building, be at a risk of flooding. Therefore, it is important that development is designed to ensure that any loss of flood storage is appropriately mitigated, and that development is resilient to the level of flood risk posed.*

- 16.27 *Local Plan Policy EP2 applies to the following development typologies:*

- i. *Householder Development: For example, sheds, garages, games rooms etc. within the curtilage of the existing dwelling, in addition to physical extensions to the existing dwelling itself. This definition excludes any proposed development that would create a separate dwelling within the curtilage of the existing dwelling, e.g. subdivision of houses into flats.*
- ii. *Minor Non-Residential Extensions: For example, industrial, commercial, leisure extensions with a footprint less than 250 square metres.*
- iii. *Minor Alterations to Property: Minor development that does not increase the size of buildings, such as alterations to external appearance. This definition excludes changes of use that would increase flood risk as a result of a changed flood risk vulnerability classification.*

- 16.28 *The nature and scale of these development types can be problematic to consider as part of a detailed Flood Risk Assessment, sometimes resulting in delay to the*

*decision-making process. To simplify the planning process for small-scale development, whilst still ensuring that matters of flood storage and resilience are adequately addressed, a proportionate Flood Risk and Resilience Statement will be required. This will need to demonstrate how any loss of flood storage resulting from the development will be appropriately mitigated, and how the development has been designed to ensure that it is resilient, now and over its lifetime, to the level of flood risk posed. In doing so, the statement will be expected to show how appropriate flood storage mitigation such as green infrastructure or SuDS has been incorporated into the development, and will need to explain how the development will be designed and constructed to reduce impacts in the event of flood water entering the building.*

## **Land and Water Quality**

16.29 Generally land and water quality in Crawley is good. Most land contamination is derived from existing or historic activities, and the potential for contamination is largely, but not exclusively, confined to the existing Main Employment Areas. Historic rural activities which are likely to have been present in the area also have the potential to give rise to land contamination. As a result, it is possible that development may be proposed on land that is already subject to existing land contamination, or which may propose a use that could, if not carefully planned, impact negatively on land or water bodies. In these cases, it will be necessary to ensure that land quality is investigated and remediated.

### **Policy EP3: Land and Water Quality**

People's health and quality of life, property and the wider environment will be protected from unacceptable risks of, and adverse effects associated with, radioactivity, chemical substances and biological agents in land.

Development will adhere to the appropriate local and national standards, procedures and principles to ensure that, having undertaken appropriate land quality assessment, remediation, and protection, the land is suitable for the proposed use.

#### **A. Sensitive Development**

Development on land that is affected by the above pollutants will be permitted where it can be clearly demonstrated that the development, its future occupiers and the wider environment will not be exposed to unacceptable risk from, or be adversely affected by, land contamination.

#### **B. Development With Potential For Causing Land Contamination**

Development that has the potential to cause land contamination will only be permitted where the applicant demonstrates that:

- i. adequate measures will be put in place to protect land quality and any receiving waters;
- ii. there will be no adverse impacts to occupiers of neighbouring land or the wider environment as a result of the development.

There are complementary pollution control regimes that also have this effect, and therefore the planning regime is only relevant where these pollution control regimes do not exist.

## **Reasoned Justification**

16.30 *The NPPF recognises that development may be proposed on land that is subject to existing land contamination, or may take the form of a use that could impact negatively on land or water bodies. The NPPF also requires that Local Plans aim to minimise pollution and other adverse effects on the natural environment and*

*encourage re-use of despoiled, degraded, or contaminated brownfield land, where appropriate, through remediation and mitigation.*

- 16.31 *The re-use of brownfield sites is encouraged in order to reduce the need to develop greenfield sites, and remove or reduce the risks posed by contamination to health, safety and the environment. In doing so, it offers a sustainable approach to redevelopment by allowing regeneration of specific areas as well as potentially delivering environmental benefits. After remediation land should be appropriate for the proposed use and as a minimum should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 (or as revised).*

## **Development and Noise**

- 16.32 Due to the urban nature of Crawley noise sources and exposure vary. There are relatively tranquil areas, such as within Crawley's large parks, ranging to much noisier areas close to the M23, Main Employment Areas, and land close to Gatwick Airport. Where exposure to noise becomes noticeable or significant, this can result in changes to people's behaviour. Should the level of noise exposure become unacceptable the impacts can become far-reaching, fundamentally affecting quality of life, and potentially resulting in serious health and stress related problems, amenity issues, and negative impacts on productivity and learning. For these reasons, it is fundamental that the relationship between noise sources and noise sensitive development is effectively and appropriately managed through the Local Plan.

### **Policy EP4: Development and Noise**

People's quality of life will be protected from unacceptable noise impacts by managing the relationship between noise sensitive development and noise sources. To achieve this, Policy EP4 should be read in conjunction with the Local Plan Noise Annex, and development will be required to adhere to the noise standards identified within it.

#### A. Noise Sensitive Development

Residential and other noise sensitive development will be permitted where it can be demonstrated that users of the development will not be exposed to unacceptable noise impact from existing, temporary or future uses.

Noise sensitive uses proposed in areas that are exposed to noise above the Lowest Observed Adverse Effect Level (LOAEL) or at the Significant Observed Adverse Effect Level (SOAEL) from existing or future industrial, commercial or transport (air, road, rail and mixed) sources will be permitted where it can be demonstrated good acoustic design has been considered early in the planning process, and that all appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be made acceptable. Noise sensitive uses proposed in areas that are exposed to noise at the Unacceptable Adverse Effect level will not be permitted.

For surface transport noise sources, the Unacceptable Adverse Effect Level is considered to occur where noise exposure is above 66dB  $L_{Aeq,16hr}$  (57dB  $L_{Aeq,8hr}$  at night).

For aviation transport sources the Unacceptable Adverse Effect is considered to occur where noise exposure is above 60dB  $L_{Aeq,16hr}$ . (57dB  $L_{Aeq,8hr}$  at night).

#### B. Noise Generating Development

Noise generating development will be permitted where it can be demonstrated that nearby noise sensitive uses (as existing or planned) will not be exposed to noise impact that will adversely affect the amenity of existing and future users. Proposals will adhere to standards identified in the Local Plan Noise Annex to establish if the proposal is acceptable in noise impact terms, and where required will, through good acoustic design,

appropriately mitigate noise impacts through careful planning, layout and design. Noise Generating Development that would expose users of noise sensitive uses to Unacceptable Adverse Effect noise will not be permitted.

#### C. Noise Impact Assessment

A Noise Impact Assessment will be required to support applications where noise sensitive uses are likely to be exposed to significant or unacceptable noise exposure. The Noise Impact Assessment will:

- i. assess the impact of the proposal as a noise receptor or generator as appropriate; and
- ii. demonstrate in full how the development will be designed, located, and controlled to mitigate the impact of noise on health and quality of life, neighbouring properties, and the surrounding area.

In preparing a Noise Impact Assessment, applicants will adhere to Planning Noise Advice Document: Sussex (2020 or latest revision) and ProPG (Professional Practice Guidance on Planning & Noise for New Residential Developments) for further guidance.

#### D. Mitigating Noise Impact

Where proposals are identified as being in the Lowest Observed Adverse Effect Level (LOAEL) or the Significant Observed Adverse Effect Level (SOAEL) categories, either through noise exposure or generation, all reasonable mitigation measures must be employed to mitigate noise impacts to an acceptable level that is as low as is reasonably achievable. Appropriate mitigation must be delivered as part of the development to ensure that the impacts of existing or known potential future noise sources are acceptable on the use being applied for by the applicant.

### **Reasoned Justification**

- 16.33 *Key to the Local Plan approach is a methodology of separating noise sensitive developments and noise generating sources, whilst ensuring that the PPG 'agent of change' principle is adhered to. For the purpose of interpreting and applying Local Plan Policy EP4, reference should be made to the Local Plan Noise Annex. The Local Plan Noise Annex outlines specific noise metrics that define when noise impact becomes observed (Lowest Observed Adverse Effect Level – LOAEL), significant (Significant Observed Adverse Effect Level – SOAEL), and unacceptable (Unacceptable Adverse Effect). It also details the appropriate noise contours that need to be taken into account in the preparation and determination of planning applications, and provides wider guidance and evidence relating to noise in Crawley. Development will therefore be expected to adhere to the guidelines set out in the Local Plan Noise Annex.*
- 16.34 *Crawley is one of 65 large urban areas in England to which the Environmental Noise Directive applies, and the Local Plan approach to managing noise has regard to Noise Action Plans produced by DEFRA to promote good health and good quality of life. Given Crawley's unique noise environment, it is considered that locally-specific guidance is needed to ensure that national objectives are met, whilst ensuring that an approach that is consistent with adjoining local planning authorities is progressed.*
- 16.35 *The NPPF requires that planning policies and decisions avoid noise giving rise to significant adverse impacts on health and quality of life. New development must be appropriate to its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment. Potential adverse impacts should be mitigated and reduced to a minimum. To ensure that the Local Plan appropriately manages and mitigates against issues of noise on a consistent basis, the policy approach draws on evidence base work.*

- 16.36 *Planning Practice Guidance: Noise expands upon the noise guidance of the NPPF. Specifically, it outlines the ‘agent of change’ principle; this being the position that development that would introduce a new land use (whether this is a noise sensitive use or a noise generating use) is responsible for managing the impact of that change. Paragraph 007 of PPG: Noise continues to recognise that Local Plans may include specific noise standards to apply to various forms of proposed development and locations in their area.*
- 16.37 *However, it is still recognised that the revocation of PPG24 (Planning and Noise) has resulted in an absence of technical guidance relating to noise. Whilst PPG24 provided guidance, through specific noise metrics, in relation to situations in which the onset of noise impact becomes significant, neither PPG: Noise, nor the Noise Planning Policy Statement for England (2010) provide technical noise metrics that define the different levels at which noise represents a planning consideration. However, given the diverse range of noise sources in Crawley (including the airport, motorway, and Manor Royal) detailed technical guidance is required to facilitate the interpretation of Local Plan Policy EP4.*
- 16.38 *ProPG: Planning & Noise – New Residential Development (May 2017) sets out principles of good acoustic design. It recognises the importance of designing out the adverse effects of noise at an early stage, using a holistic design process that creates places that are both comfortable and attractive to live in, where acoustics are considered integral to the living environment.*
- 16.39 *Technical guidance on noise impact is set out in the Local Plan Noise Annex. This draws upon evidence and the PPG24 Noise Exposure Categories as a technical starting point, to provide guidance in assessing the acceptability of development proposals in noise terms.*
- 16.40 *Where a Noise Impact Assessment is required, consideration should be given to Planning Noise Advice Document, Sussex (2020 or latest revision) which has been produced on a joint basis by East and West Sussex local authorities. This has been produced to provide clear and consistent guidance as to the level of information that should be submitted with planning applications for noise generating developments or noise sensitive developments, including guidance on when it is appropriate to submit a noise report and the required content of such a report.*

## **Air Quality**

- 16.41 As an urban borough, Crawley experiences relatively low pollution, and is fortunate in having no seriously polluted areas. Air Quality in the borough is mainly good, with national targets being met for all pollutants with the exception of nitrogen dioxide (NO<sub>2</sub>) at a small number of locations including the designated Hazelwick Air Quality Management Area (AQMA) along the A2011 at Crawley Avenue and surrounding areas<sup>146</sup>. Following exceedance of the objective levels for NO<sub>2</sub> close to Three Bridges Station, it is anticipated that Hazelwick Road AQMA will be extended to incorporate this newly identified area. A key contributor to poor air quality in these areas is emissions from all types of vehicles along busy roads and commuter routes.
- 16.42 In addition to traffic, air quality can be affected by a number of pollutant sources, including industrial, commercial and domestic. New development can contribute to local emissions and have an impact on local air quality. Therefore, it is important that opportunities are taken to improve local air quality conditions, and as a minimum, mitigate the impacts of the development through good design and sustainable building measures that promote good air quality. It is important to ensure that development that is intended to reduce greenhouse gas emissions and fuel

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<sup>146</sup> Air Quality Annual Status Report (Crawley Borough Council, 2019)



consumption is not unintentionally detrimental to local air quality. Development in or close to an AQMA should prioritise generation of heat and power through means that do not influence air quality and minimise emissions to air from combustion.

- 16.43 Therefore, it is vital that the maintenance and where possible improvement of air quality is appropriately factored into the location, design and operation of development. The overarching objective is to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by air pollution. To help achieve this, the Local Plan draws upon national and local guidance, including any subsequent Air Quality Supplementary Planning Document (SPD).
- 16.44 The 'Air Quality & Emissions Mitigation for Sussex Authorities' (2019 or latest edition), is a local guidance document produced by Sussex Air Quality Partnership and signed up to by East and West Sussex local authorities to ensure that a consistent cross-authority approach is applied to the consideration of air quality in planning applications. The document identifies situations in which planning applications should be supported by an Emissions Mitigation Assessment and/or an Air Quality Impact Assessment, and details the provision and type of mitigation that will be required.

### Policy EP5: Air Quality

People's health, quality of life and the wider environment shall be protected from the significant adverse effects of atmospheric pollution.

Development should help to improve air quality and enhance the environment. New and existing development will be prevented from contributing to, being put at risk from, or being adversely affected by atmospheric pollution. To achieve this, development will be required to prevent, or where this is not practicable, minimise the generation of pollutants that would result in a deterioration in air quality and to prevent exposure to poor air quality.

To ensure that air quality is appropriately taken into account in the planning of development, applicants will adhere to national and local guidance, including the Local Plan Planning Obligations Annex and Air Quality and Emissions Mitigation Guidance for Sussex (2019 or latest version) which should be used to identify if:

- a) an Emissions Mitigation Statement is required as part of a planning application;
- b) an Air Quality Impact Assessment is required as part of a planning application.

To reduce the overall background levels of pollution, sustainable design principles shall be incorporated into the development to ensure that the residual local emissions of air pollution are prevented or, where this is not practicable, minimised. This shall include high standards of insulation, the selection of low emission technology for heating and power; and the provision of facilities for sustainable transport including electric vehicle charge infrastructure and charge points.

Planning permission will only be granted where it can be demonstrated that the development:

- i. has appropriately factored air quality into the location, design and operation of development, and where necessary, provided appropriate mitigation; and
- ii. will not result in a deterioration of air quality within an AQMA; and
- iii. will not lead to the declaration of a new AQMA; and
- iv. does not conflict with the requirements of an air quality action plan; and
- v. will not result in an increase exposure within an AQMA.

### Odour

Where amenity sensitive development is proposed within 800 metres of a Waste Water Treatment Works an Odour Impact Assessment will be required as part of the planning application. This should confirm that either there will be no adverse amenity impact for occupiers of the proposed development, or demonstrate how appropriate mitigation will be provided to ensure the development is appropriate in amenity terms.

### Development of Industrial and Commercial Use

Development that includes industrial and commercial land uses must submit appropriate detailed evidence to enable assessment of potential significant adverse air quality impacts. Mitigation measures should be included in proposals where evidence suggests a likely significant adverse effect.

### **Reasoned Justification**

- 16.45 *The council has responsibility to ensure that poor air quality does not negatively affect the public health or the environment, both within and beyond the borough boundary, and for this reason it is important that the Local Plan is pro-active in supporting the improvement of air quality.*
- 16.46 *The NPPF is clear that planning decisions must contribute to and enhance the natural and local environment, and ensure that development is appropriate to its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment. This is expanded upon through the Planning Obligations Annex and Planning Practice Guidance: Air Quality (2019), which outlines how Local Plans may consider air quality, having regard to the type of development and where it is proposed, and measures for offsetting air quality impacts that may arise from new development.*
- 16.47 *Air Quality & Emissions Mitigation for Sussex enables the Local Plan to apply a pro-active approach to ensure that development is appropriately planned to take account of air quality, and provides suitable mitigation where air quality is a material consideration. Applicants will be required to refer to the checklists contained within the Guidance to identify if the development being proposed will require supporting information in the form of an Emissions Mitigation Statement, and if required, an Air Quality Impact Assessment. Through this approach, the Local Plan will be able to ensure that development has regard to the air quality impacts that may arise from it, having regard to its scale and location.*
- 16.48 *The purpose of the Emissions Mitigation Statement is to quantify the additional transport emissions created by the development to determine the appropriate level of mitigation that is required to avoid, minimise or offset the impact of the development on air quality. The emissions calculator contained within the document enables the estimation of the monetary value of potential damage from the development caused by nitrogen dioxide and particulate pollutants. The identified figure is the minimum sum that must be spent on practical mitigation measures, which will be implemented as part of the development, following agreement with the Local Planning Authority. The preference will be that mitigation is provided on-site by the developer. If it is not feasible to provide on-site mitigation, an equivalent financial contribution will be sought, to be secured by way of a S106 Agreement.*
- 16.49 *The purpose of the Air Quality Impact Assessment is to determine the significance of the predicted impact of the development. Where an Air Quality Impact Assessment is required, applicants are expected to complete the assessment in accordance with the Institute of Air Quality Management (IAQM) Planning Guidance available at <http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf> and should liaise direct with the council's Environmental Health team.*

16.50 *Where development is proposed in close proximity to an existing Waste Water Treatment Works, it is important that consideration is given as to whether the proposed development is appropriate, due to the risk of odour nuisance. The Odour Impact Assessment should be undertaken by the developer in liaison with the water infrastructure provider. It should determine if the proposed development would expose future occupiers to an unacceptable amenity impact, and if necessary, detail how mitigation will be provided as part of the development to ensure an appropriate amenity environment for occupiers.*

### **External Lighting**

16.51 Crawley is identified as having one of the highest levels of light pollution in Sussex<sup>147</sup>. As a predominantly urban area with a major international airport and a number of employment locations, it is necessary that urban areas of the borough are appropriately lit, particularly given the number of shift workers living in the borough. However, it is important to ensure that Crawley's green infrastructure and countryside areas outside the built up area boundary are not exposed to inappropriate light pollution, in order to retain the intrinsic character and beauty of these locations.

#### **Policy EP6: External Lighting**

Development must demonstrate how it will minimise light pollution so as to prevent sky glow, glare, light spillage and unnecessary energy usage.

Development will normally be permitted where:

1. The minimum amount of lighting necessary to achieve its purpose is specified; and
2. The means of lighting would be unobtrusively sited or well screened by landscaping or other site features; and
3. The design and specification of the lighting minimises sky glow, glare and light spillage in relation to local character, the visibility of the night sky, the residential amenities of adjoining occupiers, and public safety; and
4. Low energy lighting is used; and
5. Where lighting of a landmark feature is proposed, the level and type of illumination would enhance the feature itself.

Further information on lighting is provided in the Urban Design Supplementary Planning Document.

### **Reasoned Justification**

16.52 *The NPPF requires that planning policies and decisions should, amongst other things, "limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation"<sup>148</sup>. Within Crawley it is essential that an appropriate balance is struck between ensuring that development is appropriately lit to maximise principles of good design and reducing the fear of crime, whilst avoiding poorly thought out or obtuse angled lighting that would detract from the night-time environment. Particular caution should be applied where lighting is proposed within and adjacent to Crawley's countryside or where this could negatively impact upon the setting of green infrastructure within Crawley's built up area, where unsympathetic lighting can have an urbanising effect that detracts from the asset.*

16.53 *Crawley is also committed to reducing carbon emissions. High energy lamps and poorly designed lighting schemes result in overconsumption of energy with consequent unnecessary carbon emissions.*

<sup>147</sup> Campaign to Protect Rural England (Representation to Local Plan, 2019)

<sup>148</sup> National Planning Policy Framework, paragraph 180 (c) (2019) MHCLG

## Sustainable Transport

- 17.1 The retention of existing transport infrastructure and the provision of additional facilities and services to support new development is a key objective of the planning system. It is important to retain, and where possible enhance, opportunities in the borough for increasing active travel and public transport use, as an alternative to the car, taking into account new innovations and the need to respond to climate change.
- 17.3 It is important that the council continues to work closely with West Sussex County Council and Highways England to ensure that the necessary physical transport infrastructure is in place for the lifetime of the Plan.

### Chapter Content

- 17.4 This chapter sets out the Local Plan policies and approach to ensure sufficient transport infrastructure is in place to meet the needs of the existing and future population. General, social and green infrastructure are covered in separate chapters earlier in this Local Plan.

### The Key Issues

- 17.5 Crawley's population is still growing, two new neighbourhoods are being added to the town and additional housing sites are proposed in this Local Plan. Growth in employment numbers and at Gatwick Airport is also anticipated. Therefore, it is important to ensure that the key transport network is improved and if necessary expanded to meet the needs of the town.

### Local Plan Policies

#### Sustainable Transport

- 17.6 Developments normally generate additional traffic and create new access requirements. The location of development and the intensity of the usage are the two crucial variables that will ultimately determine whether developments are sustainable in terms of the local or regional transport network. Therefore, developments, if positioned in sustainable locations, can provide tangible opportunities to improve the wider transport network.
- 17.7 Furthermore, the NPPF states that plans should endeavour to minimise the need to travel and maximise the use of sustainable transport modes. In Crawley, the public transport system is accessible and extensive, and moreover, the distances needed to travel are relatively short, owing to the compact nature of the town. This provides an opportunity for cycling and walking to be an attractive form of transport.

#### Strategic Policy ST1: Development and Requirements for Sustainable Transport

Development should be located and designed so as to encourage travel via the walking and cycling network and public transport routes, while reducing dependency on travel by private motor vehicle (also see Policy CL3 and CL4). This should include:

- i. Designing developments to prioritise the needs of pedestrians, cyclists and users of public transport over ease of access by the motorist;
- ii. Providing an appropriate amount and type of parking in accordance with Policy ST2;

- iii. Phasing the development process so that walking and cycling infrastructure forming part of the development is in place and usable at the point of first occupation;
- iv. For development which generates a significant demand for travel, and/or is likely to have other transport implications: contributing to improved sustainable transport infrastructure off-site, including, where appropriate, bus priority measures, enhanced passenger information, and routes identified in the council's Local Cycling and Walking Infrastructure Plan;

Developments should meet the access needs they generate and not cause an unacceptable impact in terms of increased traffic congestion or highway safety. Developments will be considered acceptable in highways terms unless there would be an unacceptable impact on highway safety, or the cumulative impact on the transport network is severe and cannot be satisfactorily mitigated.

In order to consider such impacts, developments that generate a significant amount of movements (thresholds as outlined in the Local List of Planning Requirements) should be supported by a:

- a) Transport Statement, which assesses the impact of a development with relatively small transport implications, and a Travel Plan Statement, which identifies how the development will maximise the usage of sustainable modes of transport as opposed to the private motor vehicle; or a
- b) Transport Assessment, which assesses the impact of a development when there are significant transport implications, and:
  - for large developments (for example, large-scale major residential developments or any strategic developments), a Mobility Strategy; or,
  - for other developments, a Travel Plan.

The Mobility Strategy or Travel Plan will identify:

- how the development will optimise the usage of sustainable modes of transport as opposed to the private motor vehicle;
- appropriate improvements to sustainable modes, or the introduction of new infrastructure that is required to adequately mitigate development impacts and detail how this will be delivered and operated.

The applicant should view the Local List of Planning Requirements (or any subsequent document) to ensure that they submit an appropriate Transport Statement or Transport Assessment with their planning application.

### **Reasoned Justification**

- 17.8 *In line with the current NPPF, this Policy reflects the approach that developments which generate a significant amount of movement should be situated in sustainable locations. Sustainable locations are defined as sites which minimise the need to travel, such as the Town Centre, and also takes advantage of the opportunities to utilise and enhance public transport and both the cycling and walking network. As a consequence, it is considered appropriate that large retail, commercial, employment or leisure developments should be concentrated in locations where an existing transport infrastructure can sustain such developments for the long-term. It is envisaged that such a policy will encourage modal change, particularly to public transport, cycling and walking which will subsequently reduce greenhouse gas emissions and the use of private motor vehicles.*
- 17.9 *In order to promote sustainable development, the Policy further supports the national policy objectives of identifying and pursuing opportunities to promote walking, cycling and public transport use; providing for high-quality walking and cycling networks; and*



*ensuring that the design and access arrangements of new developments give priority first to pedestrian and cycling movements. National policy objectives are further outlined in Department for Transport's: Gear Change: A bold vision for cycling and walking which expects "sustainable transport issues to be considered from the earliest stages of plan-making and development proposals, so that opportunities to promote cycling and walking are pursued."<sup>149</sup> Planning policies are to provide for high quality cycling and walking networks, green spaces and green routes, and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans). The design requirements to achieve this are set out in Policy CL3.*

- 17.10 *For major developments with operational transport needs a planning obligation will be sought towards identified sustainable transport infrastructure schemes in accordance with Policy IN1 and the Planning Obligations Annex to the Plan. Additional obligations may be sought in relation to Travel Plan/Mobility Strategy measures.*
- 17.11 *Where required a Mobility Strategy should seek to plan in a positive and integrated manner for the full access requirements of a development according to Mobility as a Service (MaaS) principles.*
- 17.12 *Starting from this basis and with the support of Travel Plans and Mobility Strategies, where required, developments should mitigate transport impacts according to the following hierarchy:*
- reduce overall travel demand;*
  - minimise mode share by private car;*
  - seek to spread or time shift demand away from peak hours;*
  - offset residual impact through highways improvements, which must be achieved with no adverse impact on highway safety or to users of sustainable modes.*

## **Parking**

- 17.13 Parking standards are essential in terms of ensuring that developments have a satisfactory provision of car parking spaces and cycle parking spaces, but also to ensure that the more sustainable modes of transport are still prioritised.
- 17.14 In addition, the older residential neighbourhoods, where modern parking needs of residents were not foreseen when the neighbourhoods were first developed, have limited on-street car parking spaces available. However, owing to the limitations of the highway network and the ever increasing need to retain environmental assets and open space, it is considered that policies contained within the Local Plan should continue to concentrate on more sustainable modes of transport in order for the town to accommodate a growing travel demand.
- 17.15 Where parking is provided, it is important that it should be of a type appropriate to the anticipated demand. This should include meeting anticipated demand for Electrical Vehicle (EV) Charging Infrastructure, which is set to increase in light of the Government's 'Road to Zero', and plans to phase out petrol and diesel cars by the middle of the century<sup>150</sup>. The provision of EV charging infrastructure in Crawley is further supported by West Sussex County Council's 2019 Guidance on Parking in New Developments and emerging EV Strategy<sup>151</sup>.

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<sup>149</sup> Gear Change A bold vision for cycling and walking, Page 26, (2020) DFT

<sup>150</sup> The Road to Zero: Next steps towards cleaner road transport and delivering our Industrial Strategy (2018) DFT

<sup>151</sup> Guidance on Parking at New Developments (2019) WSCC

## Policy ST2: Car and Cycle Parking Standards

Development will be permitted where the proposals provide the appropriate amount and type of car and cycle parking (including electric vehicle charging infrastructure) to meet its needs when it is assessed against the borough council's car and cycle parking standards. These standards are contained in the Parking Standards Annex to this Plan.

Car parking standards for residential development are based on the accessibility of the area, the levels of car ownership, and the size of any new dwellings.

Parking standards for other types of developments will be based on the particular usage of the premises, which will take account of the intensity and requirements of each use and the accessibility of an area by public transport and other sustainable modes.

### **Reasoned Justification**

17.16 *In accordance with the NPPF, Local Authorities are encouraged to ensure the appropriate levels of parking are provided, and to seek to enhance the quality of parking, particularly in the Town Centre, to ensure that it is convenient, safe and secure. This Policy will seek to improve parking throughout the town via the assessment of parking standards for developments (or existing developments that increase floor space and/or intensify the permitted usage), which ensures that the appropriate level of cycle and car parking will accompany all planning applications that are permitted.*

17.17 *Parking standards for both residential and non-residential development are set out in the Parking Standards Annex to the Plan. In line with the NPPF, the parking standards take into account the accessibility of the development through the use of zones and reflect the ability of certain areas to accommodate further parking spaces. In addition, the particular type, mix and usage of the site will have a bearing on the number of parking spaces that any planning application will require. With these parking standards, an appropriate number of both cycle and car parking spaces will be provided, alleviating congestion.*

### **Rail Stations**

17.18 The main rail stations provide highly sustainable opportunities for major development and are fundamental to ensuring that sustainable modes of transport are utilised. However, it is important that such development opportunities should reflect the function and operation of the particular stations concerned. The key stakeholder operating the rail stations, Network Rail, is also committed to improving Gatwick Airport and Three Bridges rail stations over the Plan period, with major improvements being progressed for both. Improvements are planned at Crawley station.

## Policy ST3: Improving Rail Stations

Any improvements or developments at or within the vicinity of railway stations will be expected to enhance the specific roles of the individual stations, the sustainable access to individual stations, and:

- a) at Gatwick Station, support its function as an airport-related interchange and provide opportunities for broadening the function of the station as an interchange for surface travellers using rail, coach, Fastway and other buses consistently with the safe and efficient operation of the airport;
- b) at Three Bridges Station, support its role as a potential parkway station and as a major interchange between the rail, bus, highway, cycle and pedestrian network;

- c) at Crawley Station, support its role as a major gateway to the Town Centre and improve its integration with the main shopping area and bus station and accessibility by cycle and pedestrians;
- d) at Ifield Station, strengthen its role as a local suburban station meeting the needs of current and future residents in the west of the town.

For further policy guidance relating to land close to the borough's rail stations, please see Policy CL4.

### **Reasoned Justification**

17.19 *This policy endeavours to ensure that the specific function of each rail station within the borough is enhanced:*

- *Gatwick rail station is in a highly strategic location for transport, not only within the borough, but for the wider South East region. A major improvement project commenced in 2020, and it is important to continue to seize opportunities for any further improvements for broadening the function of the station as an interchange, to include additional surface travellers, particularly those who use sustainable modes of transport, such as rail or buses. Further improvements to the station's concourse and access may be necessary to support any increases in passenger numbers at the airport in the future.*
- *Three Bridges rail station is a major rail junction for both the Brighton main line and the Bognor Regis/Southampton rail line. As a major transport interchange for commuters, it is envisaged that the station can better serve those using buses, cycles and the highway network. An improvement project is being progressed.*
- *Crawley rail station acts as a major gateway into the Town Centre, and thus, it is important to support the station's integration into the main shopping area and with the bus station through environmental improvements and high-quality urban design. Residential-led redevelopment of the station and car parks has planning permission and public realm improvements to both the rail and bus station are being progressed.*
- *At Ifield rail station, the development of the Kilnwood Vale neighbourhood and any future proposals to the west of the town (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.*

17.20 *The NPPF states that Local Plans should allow authorities to identify priority areas for infrastructure provision and/or environmental enhancements to support sustainable economic growth. It is integral for both Crawley and Three Bridges rail stations to have improvements or developments within the locality, in order to ensure that opportunities are exploited for the use of sustainable transport, which coincides with Policy ST1.*

### **Alignment for New Link Road**

17.21 The Transport Modelling undertaken for the Crawley Borough Local Plan Review has identified a number of junctions within the borough which are already at capacity or require mitigation following new development. This is based on the quantum of development already coming forward in Crawley, and that being delivered through the adopted Mid Sussex District Plan, Horsham District Planning Framework and Reigate and Banstead Core Strategy. Further major development is being promoted to the west of Crawley, through the Horsham District Local Plan Review and Gatwick Airport's Master Plan 2019 anticipates significant growth in passenger numbers at the airport, even just on a single runway. The cumulative impact of these developments will exacerbate existing capacity issues on roads within Crawley.

- 17.22 Therefore, it is considered necessary to undertake further strategic transport assessment considering the cumulative impacts of development across the area. Due to the potential levels of development, it is considered appropriate that the council identifies and safeguards the potential corridor of land within Crawley for a potential full Western Link Road, in partnership with West Sussex County Council. This will need to connect to a route corridor within Horsham District, identified by Horsham District Council, to the west.

#### **Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road**

The Local Plan Map identifies a Search Corridor for a Crawley Western Link Road linking the A264 with the A23. This Search Corridor will be safeguarded from development which would be incompatible with the future delivery of a full Crawley Western Link Road.

The design and route of the Western Link Road must take account of:

- a. its impact on (but not limited to):
  - residential and commercial properties close to the route;
  - the flood plain;
  - the rural landscape;
  - local biodiversity;
  - sports pitch provision and recreation facilities; and
  - heritage and heritage landscape assets and visual intrusion.
- b. the desirability and requirements of bus priority measures (including future proofing for forecast traffic growth and congestion).

Connectivity by non-vehicular modes of transport between Crawley's urban neighbourhoods and the wider Sussex countryside should be maintained and enhanced.

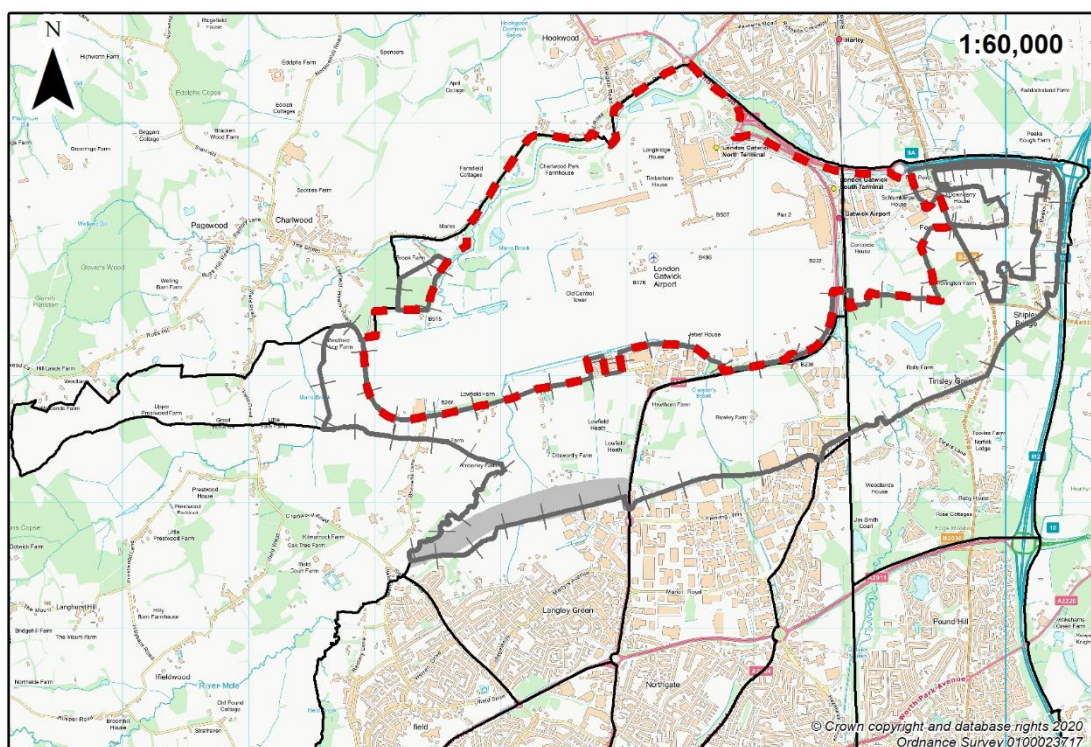
#### **Reasoned Justification**

- 17.23 *The Western Link Road should provide a new strategic road link for traffic from the west, and from Kilnwood Vale and any new development west of Crawley to link directly with the A23 north of County Oak serving Manor Royal and Gatwick. This will remove the need for this traffic to come further east into Crawley and travel around all the roundabouts accessing Crawley's western neighbourhoods to link with the A23, a route which is known to be increasingly congested at peak times.*
- 17.24 *The provision of a full Western Link Road between the A264, west of Kilnwood Vale, and the A23 (North of County Oak) is necessary to reduce existing congestion on the A2220 and A23, remove through traffic from the neighbourhood junctions and residential roads, reduce inappropriate usage and increased levels of traffic on rural routes to Gatwick Airport, and reduce pressure on the M23 Junctions 10 and 11. It will also help mitigate the surface access impacts of growth at the Airport, provide alternatives to help address the impacts from permitted new developments (Kilnwood Vale, Pease Pottage and North Horsham) and from potential future developments on the western side of Crawley. It is anticipated that detailed impacts of further development onto the Crawley road network would be modelled through the Horsham District Local Plan Review process.*
- 17.25 *Without commitment to the construction of a full Western Link Road between the A264 and A23 (North), all the traffic from any development to the west of Crawley, from permitted schemes and any future proposals which could emerge through the Horsham District Plan Review and/or through planning applications permissions granted as windfalls, is likely to feed into residential roads in Ifield and/or Langley Green and onto the already congested A23 junctions, particularly the Ifield Avenue/A23 junction in the long term. New highways crossing the Ifield Brook*



*Meadows and Rusper Road Playing Fields Local Green Space would be wholly unacceptable, given the impact this would have on ancient woodland, the biodiversity in the LWS and LNR, the character of Ifield Village Conservation Area, the flood plain and the recreational use of the Local Green Space.*

- 17.26 *A Western Link Road would enable the prioritisation of connectivity by more direct routes for public transport, cycling and walking into Crawley from any new development to the west, with vehicular traffic having to take a longer route along the Link Road. Existing Public Rights of Way should be designed into the road, with safe, accessible and convenient road crossing opportunities provided. New opportunities for walking, cycling and horse riding links should be explored.*
- 17.27 *Land was previously safeguarded for a Crawley Western Link Road as part of the West of Bewbush Joint Area Action Plan (Policy WB23) because, whilst the Transport Assessment for Kilnwood Vale did not demonstrate it was necessary to serve that development alone, it was considered that it might be needed to serve future development west of Crawley, or wider sub regional objectives.*
- 17.28 *The current Search Corridor is located at the southern edge of land safeguarded for a potential future southern runway at Gatwick Airport but the council is seeking to engage with Gatwick Airport about the detailed alignment of the route, with the aim of minimising the impact on residents living close to the route and reducing the need for land to be compulsorily purchased.*



- Indicative Search Corridor for a Western Link Road (Policy ST4)
- Gatwick Airport Boundary (Policy EC1, EC2, GAT1 - GAT4)
- Gatwick Airport Safeguarded Land (Policy GAT2)



## Appendix A: Sustainability Objectives

1. To minimise climate change, by taking actions to reduce the concentration of greenhouse gases in the atmosphere.
2. To adapt to the effects of climate change, by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change.
3. To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings.
4. To ensure that everyone has the opportunity to live in a decent and affordable home.
5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.
6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.
7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.
8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.
9. To promote healthy, active, cohesive and socially sustainable communities. To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.

Local Plan Policy	SA Objective								
	1	2	3	4	5	6	7	8	9
SD1	++	++	++	+	+	++	++	++	++
SD2	+	0	0	0	0	+	+	+	+
CL1	+	+	++	++	+	+	++	++	++
CL2	++	++	++	++	+	++	++	+	++
CL3	++	++	++	++	+	+	++	++	++
CL4	++	++	+	++	+	+	++	++	++
CL5	+	+	+	++	+	+	++	+	++
CL6	+	++	++	+	+	++	+	+	++
CL7	/	+	++	/	/	++	+	+	+
CL8	+	/	+	/	/	+	+	/	+
CL9	/	/	+	/	/	++	/	+	+
DD1	++	++	++	+	+	+	++	+	+
DD2	0	0	+	++	+	0	+	/	++
DD3	+	+	+	+	0	+	0	0	+
DD4	++	++	++	/	/	++	+	/	+
DD5	0	0	++	+	+	0	0	0	++
DD6	0	0	++	0	+	++	0	0	+
DD7	?	-	?	0	0	+	-	0	0
HA1	0	?	++	0	/	0	0	0	+
HA2	0	?	+	0	/	0	0	0	+
HA3	0	?	++	0	0	+	0	0	+
HA4	0	?	+	0	/	0	0	0	+
HA5	0	?	++	0	/	0	0	0	+
HA6	0	0	++	0	/	+	0	0	+
HA7	0	+	+	0	/	+	0	0	+
OS1	+	+	+	+	+	++	+	+	++
OS2	+	++	+	0	/	+	+	++	++
OS3	+	0	+	0	0	+	++	+	++
IN1	+	+	0	+	+	+	+	++	+
IN2	+	+	/	0	+	+	+	+	+
IN3	+	+	+	+	+	+	+	++	+
EC1	?	?	+	+	++	+	+	+	++
EC2	+	+	+	+	++	+	+	+	++

Local Plan Policy	SA Objective								
	1	2	3	4	5	6	7	8	9
EC3	+	+	++	0	++	0	+	+	+
EC4	?	+	+	+	++	-	+	+	+
EC5	+	+	+	+	++	0	+	0	+
EC6	+	?	+	0	++	0	0	0	+
EC7	+	+	+	0	+	0	++	0	0
EC8	0	0	0	0	+	0	+	0	0
EC9	0	0	0	0	++	0	0	0	+
EC10	0	0	+	0	+	0	0	0	+
EC11	0	0	++	++	++	0	?	?	+
EC12	+	+	++	?	+	0	++	++	++
EC13	+	0	+	0	+	-	0	+	0
GAT1	-?	?	0	0	++	+	+	+	0
GAT2	+	+	+	+	++	-?	+	+	+
GAT3	-	-	0	0	/	-?	-	/	0
GAT4	0	0	0	0	+	0	+	0	0
TC1	0	0	+	+	++	0	++	+	++
TC2	+	+	+	+	+	0	+	++	++
TC3	+	+	++	++	++	0	++	+	++
TC4	+	+	++	0	0	0	0	0	++
TC5	++	+	++	0	++	0	++	+	+
H1	0	+	+	-?	+	+	/	0	+
H2	0	+	+	+	0	+	+	+	++
H3	0	+	++	+	0	++	0	?	++
H3a	+	+	++	++	0	/	0	0	++
H3b	0	/	++	+	0	++	0	0	+
H3c	0	/	++	+	++	0	++	/	++
H3d	0	0	++	++	0	0	++	++	+
H3e	++	0	+	++	++	0	+	0	++
H3f	0	+	+	+	0	++	0	++	++
H4	0	0	0	+	0	0	0	0	+
H5	0	0	0	++	++	0	0	0	++
H6	0	0	0	++	++	0	0	0	++
H7	+	+	+	++	+	0	0	0	+
H8	0	0	?	+	0	-	0	0	+
H9	0	0	0	+	0	0	0	0	+
GI1	++	++	++	0	0	++	++	++	++
GI2	++	+	+	/	/	++	/	/	+
GI3	++	++	++	/	/	++	0	+	+
GI4	+	+	0	0	0	++	0	++	++
SDC1	++	++	+	++	++	+	0	0	++
SDC2	++	0	0	+	+	0	0	+	+
SDC3	+	++	0	+	0	++	0	0	+
EP1	0	++	++	?	?	++	0	+	+
EP2	/	+	0	0	0	+	0	+	+
EP3	++	++	++	+	0	+	0	0	++
EP4	0	0	0	++	+	0	0	0	++
EP5	++	++	0	0	0	++	0	0	++
EP6	++	++	++	+	0	+	0	0	++
ST1	+	+	+	+	+	+	++	+	+
ST2	+	/	+	+	+	+	++	++	+
ST3	+	+	+	0	+	0	++	+	+
ST4	-	-	/	+	+	-	-	++	-
	Significant Positive Impact on the sustainability objective (++)								
	Positive Impact on the sustainability objective (+)								
	Possible Positive or Slight Positive Impact on the sustainability objective (+?)								
	No Impact on the sustainability objective (0)								
	Neutral Impact on the sustainability objective (/)								
	Uncertain Impact on the sustainability objective (?)								
	Possible Negative or Slight Negative Impact on the sustainability objective (-?)								
	Negative Impact on the sustainability objective (-)								
	Significant Negative Impact on the sustainability objective (--)								

## Appendix B: Supporting Guidance Documents

### Crawley Borough Council Documents

**Crawley 2030: Crawley Borough Local Plan 2015 – 2030**, 2015

**Crawley Local Plan Map**, 2015

**Crawley CIL Charging Schedule**, 2016

**Crawley Regulation 123 List**, 2016

**Manor Royal Design Guide Supplementary Planning Document**, 2013

**Manor Royal Public Realm Strategy**, 2013

**Planning and Climate Change Supplementary Planning Document**, 2016

**Green Infrastructure Supplementary Planning Document**, 2016

**Town Centre Supplementary Planning Document**, 2016

**Urban Design Supplementary Planning Document**, 2016

**Affordable Housing Supplementary Planning Document**, 2017

**CIL Supporting Document: Instalments Policy**, 2016

**CIL Supporting Document: Discretionary Social Housing Relief**, 2016

**CIL Supporting Document: Developer Contributions Guidance Note**, 2016

**Guidance Note: Energy and Water Efficiency for Alterations and Extensions to Buildings**, 2016

**Affordable Housing: Summary Guidance Document for Small Residential Developments**, 2017

**Tinsley Lane Development Brief**, 2017

**Breezehurst Drive Playing Fields Development Brief**, 2018

**Brighton Road Conservation Area Statement**, 2018

**Dyers Almshouses Conservation Area Statement**, 2018

**Forestfields and Shrublands Conservation Area Statement**, 1998

**Hazelwick Road Conservation Area Statement**, 2019

**High Street Conservation Area Statement**, 1998

**Ifield Village Conservation Area Statement**, 2018

**Malthouse Road Conservation Area Statement**, *to be prepared*

**St Peter's Conservation Area Statement**, 2005

**Southgate Neighbourhood Centre Conservation Area Statement**, *to be prepared*

**Sunnymead Conservation Area Statement**, 2004

**Worth Conservation Area Statement**, 2018

**Air Quality Management Plan, *anticipated 2021***  
**HMO Space Standards, 2013**  
**Employment Land Trajectory Base Date: 1 September 2020, January 2021**  
**Housing Trajectory, 1 September 2020**  
**Strategic Flood Risk Assessment, 2020**  
**Local Plan Noise Annex, 2020**  
**Local Plan Planning Obligations Annex, 2020**  
**Local Plan Parking Standards Annex, 2020**  
**New Directions Crawley Transport Strategy, 2020**  
**2019 Legal Agreement between CBC, WSCC and the airport operator**  
**Crawley Economic Development Strategy, *under preparation 2020***

#### **Other Professional Guidance Documents**

**European Directive 2001/42/EC**  
**Localism Act 2011**  
**Planning and Compulsory Purchase Act 2004**  
**Town and Country Planning Act 1990**  
**The Town and Country Planning (Local Planning) (England) Regulations 2012**  
**Environmental Assessment of Plans and Programmes Regulations 2004**  
**National Planning Policy Framework MHCLG, 2019**  
**Planning Practice Guidance MHCLG, 2014 and subsequent updates**  
**Gatwick 360° Strategic Economic Plan Coast to Capital Local Enterprise Partnership, 2018**  
**UK Industrial Strategy: Building a Britain Fit for the Future 2017**  
**Local Industrial Strategy Coast to Capital, 2020**  
**Gatwick Diamond Local Strategic Statement 2017**  
**West Sussex Waste Local Plan WSCC, 2014**  
**West Sussex Joint Minerals Local Plan WSCC and SDNP, 2018**  
**Living with Beauty: Final report of the Building Better, Building Beautiful Commission, MHCLG, 2020**  
**Technical Housing Standards – Nationally Described Space Standards MHCLG, 2015**  
**The Building Regulations 2010: Access to and use of buildings M Volume 1: Dwellings MHCLG, 2016**  
**Planning Practice Guidance: Housing and Economic Needs Assessment MHCLG, 2019**  
**Planning Policy for Traveller Sites MHCLG, 2015**  
**West Sussex Joint Strategic Needs Assessment (JSNA) “People and Places” WSCC 2019**  
**National Design Guide: Planning practice for beautiful, enduring and successful places MHCLG 2019**

**By Design – Urban Design and the Planning System** DETR

**Secured By Design**

**Building for Life Criteria** CABE at the Design Council, Design for Homes and Home Builders Federation, third edition, 2015

**Creating successful masterplans, a guide for clients** 2008/09 CABE

**Understanding Historic Buildings: A Guide to Good Recording Practice** Historic England, 2016

**Historic Environment Good Practice Advice Planning Note 3: The setting of Heritage Assets** Historic England, 2017

**Active Design Guidance** Sport England and Public Health England, 2015

**Essex Design Guide** Essex Local Authorities Essex Planning Officers Association, 2018

**Residential Developments and Trees: A Guide for Planners and Developers** The Woodland Trust, 2019

**AOA Technical Aerodrome Safeguarding Advice Notes** Airport Operators Association

**Safely Landed? Is the current aerodrome safeguarding process fit for purpose?** Lichfields, 2018

**Dementia and Town Planning RTPI Practice Advice** RTPI, 2017

**Accessible Natural Green Space Standards in Town and Cities** Natural England, 2011

**Space for People, Targeting Action for Woodland Access** The Woodland Trust, 2017

**Natural England Standing Advice**

**Natural Environment and Rural Communities Act 2006**

**Biodiversity 2020 Defra**

**Planning & Energy Act 2008**

**Housing Standards Review Consultation** Department for Communities and Local Government, 2013

**Housing Standards Review Technical Consultation** Department for Communities and Local Government, 2014

**The Business Case for Green Building** World Green Building Council. 2013

**Technical Guidance to the National Planning Policy Framework** Department for Communities and Local Government, 2012

**Zero Carbon Homes – Impact Assessment** Department for Communities and Local Government, 2011

**Building Regulations Part L**

**BREEAM New Construction: Non-Domestic Buildings Technical Manual** BRE Global Ltd, 2014

**LEED 2009 for New Construction and Major Renovations Rating Systems** U.S. Green Building Council, 2009

**EU Water Framework Directive**

**Water Stressed Areas – Final Classification** Environment Agency, 2013

**Environment Agency Flood Map for Planning** Environment Agency, updated quarterly

**Delivering Sustainable Drainage Systems** DEFRA, 2014



**Local Flood Risk Management Strategy** WSCC, 2013

**West Sussex LLFA Policy for the Management of Surface Water** WSCC, 2018

**Planning Noise Advice Document: Sussex** East and West Sussex Authorities, 2020

**Air Quality and Emissions Mitigation Guidance for Sussex** Sussex Air, 2019

**West Sussex Energy Study** AECOM Limited, 2013

**The Road to Zero: Next Steps towards cleaner road transport and delivering our Industrial Strategy** 2018

**Guidance on Parking at New Developments** WSCC, 2019

**Gear Change A Bold Vision for Cycling and Walking**, DfT, 2020

**Aviation Policy Framework**, DfT, March 2013

**Aviation 2050 – the Future of UK Aviation**, December 2018

**Beyond the Horizon: The Future of UK Aviation – making best use of existing runways**, DfT, June 2018

## Background Studies & Evidence Base Documents

### Development Strategy

Gatwick Diamond Local Strategic Statement (2017) Surrey County Council, West Sussex County Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead District Council.

Gatwick Diamond Local Strategic Statement Memorandum of Understanding (2016) Surrey County Council, West Sussex County Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead District Council, Tandridge District Council.

Draft Infrastructure Plan (2020) Crawley Borough Council

Crawley Local Plan draft Sustainability Appraisal (2020) Crawley Borough Council

Crawley Local Plan Sustainability Appraisal Scoping Report and Draft Report (July 2019) Crawley Borough Council

Crawley draft Local Plan Habitat Regulations Screening Report (2020) Crawley Borough Council

Local Plan draft Consultation Statement (2020) Crawley Borough Council

Crawley Borough Council's Local Plan Local Development Scheme 2020 – 2023 (2020) Crawley Borough Council

Crawley's Statement of Community Involvement (2020) Crawley Borough Council

Viability Assessment for the Crawley Borough Local Plan Review: Whole Plan Policies & Community Infrastructure Levy (2020) DixonSearle Partnership

Crawley Borough Council Whole Plan & Community Infrastructure Levy Viability Assessment (April 2015) Nationwide CIL Service

Community Infrastructure Levy, SHLAA and Affordable Housing Viability Assessment (2013) Nationwide CIL Service

### WELLBEING & COMMUNITIES

West Sussex Joint Strategic Needs Assessment (JSNA) "People and Places" WSCC 2019

Building for Life – Evaluating Housing Proposal Step by Step

Crawley Baseline Character Assessment (2009)

Crawley Extensive Urban Survey (2008) English Heritage, West and East Sussex

By Design – Urban Design and the Planning System, DETR

Secure by Design

PPS5 Good Practice Guide

Crawley Built-Up Area Boundary Review (2015) Crawley Borough Council

Crawley Landscape Character Assessment (2012) Crawley Borough Council

Urban Rural Fringe Study for Crawley (2006)

A Strategy for West Sussex Landscape (2005) West Sussex County Council

West Sussex Landscape Character Assessment (Land Management Guidelines for Northern Vales, High Weald Forests and adjacent High Weald) (2003) West Sussex County Council

Trees in the Townscape: A Guide for Decision Makers (2012) Trees and Design Action Group

High Weald Area of Outstanding Natural Beauty Management Plan 2019 – 2024 (2019) AONB Unit

Crawley Conservation Areas and Non-Designated Assets Review (2020) Place Services

Crawley ASEQs and Locally Listed Buildings Heritage Assessment (2010) Alan Baxter

Historic Parks and Gardens Review (2013) Sussex Gardens Trust

Crawley Open Space, Sport and Recreation Assessment: Open Space Study (2020) The Environment Partnership

Crawley Open Space, Sport and Recreation Assessment: Indoor Sport Facilities Study (2020) Strategic Leisure Limited (SLL)

Crawley Open Space, Sport and Recreation Assessment: Playing Pitch Strategy (2020) 4Global

Crawley Open Space Study (2013) JPC Strategic Planning and Leisure Limited

Crawley Playing Pitch Assessment (2013) JPC Strategic Planning and Leisure Limited

Crawley PPG17 Open Space, Sport and Recreation Assessment (2008) PMP

Crawley Borough Play Strategy and Development Plan 2007-2010 Crawley Borough Council

Crawley Borough Playing Pitch Strategy for Outdoor Sports (2005) Crawley Borough Council

West Sussex Rights of Way Improvement Plan 2018 – 2028 (2018)

Draft Infrastructure Plan (2020) Crawley Borough Council

## ECONOMIC GROWTH & SOCIAL MOBILITY

Northern West Sussex Economic Growth Assessment (2020) Lichfields

Northern West Sussex Economic Growth Assessment: Focused Update for Crawley (2020) Lichfields

Crawley Economic Growth Assessment Update (2015) NLP

Northern West Sussex Economic Growth Assessment (2014) NLP

Northern West Sussex Economic Growth Assessment: Crawley Emerging Findings Paper (2013) NLP

Employment Land Review Part 1 (2009) GL Hearn

Employment Land Review Part 2 (2010) GL Hearn

Employment Land Availability Assessment Base Date 1 September 2020 (January 2021) Crawley Borough Council

Employment Land Trajectory Base Date 1 September 2020 (January 2021) Crawley Borough Council

Manor Royal Economic Impact Study (2018) Lichfields

Manor Royal Design Guide Supplementary Planning Document and Public Realm Strategy (2013) Crawley Borough Council

Manor Royal Master Plan (2010) GVA

Crawley Manor Royal: Final Report (2008) Regeneris  
Crawley Employment and Skills Programme 2019 – 2024  
Discussion Paper 05: Aviation Noise (2013) Airports Commission  
Gatwick Airport Interim Parking Strategy (April 2017)  
Gatwick Airport Surface Access Strategy (May 2018)  
2019 Gatwick Airport Master Plan  
Crawley Retail, Commercial Leisure and Town Centre Neighbourhood Needs Assessment (2020) Nexus  
Retail Capacity Update (2013) DTZ  
Crawley Retail Capacity and Impact Study (2010) DTZ

## HOUSING

Northern West Sussex Strategic Housing Market Assessment (2019) Icen  
Market Housing Mix (2016) Chilmark Consulting  
Starter Homes Needs and Implications (2016) Chilmark Consulting  
Northern West Sussex Housing Market Area 'Affordable Housing Needs Model Update' (2014) Chilmark Consulting Ltd.  
North West Sussex – Crawley: Strategic Housing Market Update (2012) GVA  
Northern West Sussex Strategic Housing Market Assessment (2009) GVA Grimley  
Identifying the Local Housing Markets of South East England (2004), DTZ Peida Consulting on behalf of South East Regional Assembly and Homes and Communities Agency  
Objective Assessment of Crawley's Housing and Employment Needs – Updated Report (March 2015) Chilmark Consulting Ltd.  
Crawley Borough Council Locally Generated Housing Needs Assessment (2011) Nathaniel Lichfield & Partners  
Crawley Strategic Housing Land Availability Assessment (2020) Crawley Borough Council  
Crawley Housing Trajectory, 1 September (2020) Crawley Borough Council  
Windfall Allowance Review 2020-2036 (2020) Crawley Borough Council  
Establishing a Windfall Allowance for the Local Plan Period 2015-2030 (2014) Crawley Borough Council  
Crawley Borough Council Urban Capacity Study (2013) Crawley Borough Council  
Crawley Borough Council Urban Housing Potential Study (2004) Baker Associates  
New Market Town Study (2010)  
West Sussex Bio City (2010) Bio City Development Company  
At Crawley Study (2009) GL Hearn  
Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment Review (2020) Crawley Borough Council

## ENVIRONMENTAL SUSTAINABILITY

Green Infrastructure Map (2019) Crawley Borough Council

South East Green Infrastructure Framework (2009)

Review of CBC's Sites of Nature Conservation Importance Management Plans (2010) Crawley Borough Council

Biodiversity Action Plans – Woodland, Urban (Sussex Wildlife Trust)

West Sussex Energy Study (2013)

Crawley Carbon and Waste Reduction Strategy (2012) Crawley Borough Council

Decentralised Energy Study for Crawley (2011) Hurley Palmer Flatt

Policy Review Document (2009) Energy Centre for Sustainable Communities

Crawley Borough Council Corporate Climate Change Strategy (2008) Crawley Borough Council

Planning and climate change in Crawley (2007) Energy Centre for Sustainable Communities

West Sussex LLFA Policy for the Management of Surface Water (2018)

Environment Agency Flood Map for Planning, Environment Agency

Water Stressed Areas – Final Classification (Environment Agency, July 2013)

Crawley Borough Council Strategic Flood Risk Assessment (SFRA) (2020) JBA

Site Allocations and Flood Risk Background Paper (2020) Crawley Borough Council

Gatwick Sub-Region Water Cycle Study (2020) JBA

Gatwick Sub-Region Water Cycle Study Crawley update (2013) Entec UK Limited

Gatwick Sub-Region Water Cycle Study (2011) Entec UK Limited

Gatwick Sub Region Joint Water Cycle Study Scoping Study (2010) Crawley Borough Council, Horsham District Council, Mid Sussex District Council, and Reigate and Banstead Borough Council

The Environmental Noise Directive (2002/49/EC)

Environmental Noise (England) Regulations 2006, as amended

Noise Policy Statement for England (2010) DEFRA

DEFRA Noise Action Plan: Agglomerations (2014)

Environmental Noise and Health in the UK (2010) Ad hoc Expert Group on Noise and Health, Health Protection Agency, Dept. of Health and DEFRA

Report to Secretary of State for Communities and Local Government: Land North East Sector (2009) Inspector Martin Pike

Annex 1 PPG24: Planning and Noise

Planning Noise Advice Document: Sussex (2020) East and West Sussex Authorities

PROPG: Planning and Noise (2017)

BS8233: Guidance on Sound Insulation and Noise Reduction for Buildings (2014)

BS4142: 2014 + A1: 2019: Method for Rating and Assessing Industrial and Commercial Sound

Air Quality and Emissions Mitigation Guidance for Sussex (2018) Sussex Air



2019 Air Quality Annual Status Report (ASR)  
Transport Modelling (2020) Stantec  
Transport Modelling Part 1 (2012) Amey Consulting  
Transport Modelling Part 2 (2014) Amey Consulting  
West Sussex County Council Transport Strategy

## Glossary

### Definitions

Active Frontages	Street frontages where there is an active visual engagement between those in the street and those on the ground floors of buildings. This quality is assisted where the front facade of buildings, including the main entrance, face and open towards the street. The objective of achieving active frontages can be realised through a variety of means. Overall, the desirable outcome is avoiding blank walls and increasing visual interest and activity and improving surveillance.
Active Travel	Active travel means making journeys by physically active means such as walking or cycling. These are usually shorter journeys, like walking or cycling to the shops, walking the kids to school, cycling to work, or cycling to the station to catch a commuter train. For many people this offers a convenient and accessible way to build physical activity into their lives.
Affordable Housing	<p>Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.</p> <p>See also: Affordable Rented Housing; Intermediate Housing; and Social Rented Housing.</p> <p>Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.</p>
Affordable Rented Housing	Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).
Air Quality Management Area	An area designated by the council because it is likely not to achieve national air quality objectives by the relevant deadlines.
Airport-Related Parking	Parking that is provided for those who travel to the airport by private vehicle for flights. Airport-related parking includes parking associated with hotel guests leaving cars whilst flying from the airport.

Ancient Woodland	An area that has been wooded continuously since at least 1600AD.
Area Action Plan	An optional development plan document. An AAP provides specific planning policy and guidance for a particular location or an area of significant change.
Areas of Special Local Character	Designated areas that are considered to be of distinctive character or quality and therefore worthy of protection through rigorous control of new development, yet do not quite comply with the criteria for designation as Conservation Areas.
Article 4 Direction	A direction which withdraws automatic planning permission granted by the General Permitted Development Order.
B Use Classes/Business floorspace/Business Uses	Business: B1a, B1b, B1c; General Industry: B2; and Storage or Distribution: B8, as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended).
BRE Environmental Assessment Method (BREEAM)	A BREEAM assessment uses recognised measures of performance, which are set against established benchmarks, to evaluate a building's specification, design, construction and use. The measures used represent a broad range of categories and criteria from energy to ecology. They include aspects related to energy and water use, the internal environment (health and well-being), pollution, transport, materials, waste, ecology and management processes.
Building Regulations	National Standards, separate to the planning system designed to uphold standards of public safety, health, and construction.
Built-Up Area Boundary	This is the boundary around the area defined in the Local Plan as being built up, distinguishing it from the countryside.
Carbon Neutral	The term given to achieving net zero carbon emissions by balancing the amount of carbon released with an equivalent amount sequestered or offset.
Climate change adaptation	Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which moderate harm or exploit beneficial opportunity.
Climate change mitigation	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

Commission for Architecture and the Built Environment (CABE)	The organisation was the government’s advisor on architecture, urban design and public space in England. Its function was to influence and inspire those making decisions about the built environment. It championed well-designed buildings, spaces and places; ran public campaigns; and provided expert, practical advice. In April 2011 the Design Council and CABE came together as one organisation.
Community Infrastructure Levy	A levy allowing local authorities to raise money from owners or developers of land undertaking new building projects in their area in order to fund improvements to local infrastructure.
Conservation (for heritage policy)	The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.
Conservation Area	Areas of special architectural or historical interest, the character or appearance of which it is important to preserve or enhance.
Core Strategy	The central planning document in the Local Development Framework. This system of planning policy was replaced when the NPPF was published.
Countryside	The area outside of the built up area boundary.
Council	Where the “council” or the “borough council” is used it generally relates to Crawley Borough Council, unless it is specified otherwise.
COVID-19	The highly contagious respiratory Corona Virus Disease 2019, declared a pandemic by the World Health Organisation on 11 March 2020, meaning it had spread worldwide.
Crawley	Where "Crawley" is used, it generally relates to the area that is within Crawley Borough Council's administrative boundary.
Crossovers	A vehicular access from the highway over a pavement or verge to the curtilage of a property.
Decentralised/District Energy Networks	Local renewable energy and local low-carbon energy usually but not always on a relatively small scale encompassing a diverse range of technologies.
Development	For the purposes of policy interpretation, all reference to “Development” that is made within the Crawley Local Plan, including reference to “Development Proposals”, “Development Schemes”, “Proposals” or “Schemes”, is as per the statutory definition of development set out in Section 55 of the Town and County Planning Act 1990.

District Heating Priority Areas	Designated areas within Crawley that have particular potential for the establishment of decentralised energy networks.
Edge of centre	For retail policy purposes, edge-of-centre sites are locally defined as those sites falling outside of the Primary Shopping Area, though within the Town Centre Boundary, as identified on the Local Plan Map. For all other Main Town Centre Uses, the NPPF definition of edge of centre applies.
Exceptionally significant development	Development which is of national importance.
Embedded carbon/ greenhouse gasses	The carbon emissions generated in the supply chain for that item/product, in order to both create it and move it to where it will be used or sold. It includes the emissions created in extracting and transporting the raw materials required to make the product, the emissions from the manufacturing process, and sometimes also the emissions generated in transporting the final product to the point of sale or use.
Employment Uses	Uses as defined within the Use Classes Order that generate employment such as leisure, retail and all B use class development. This does not include any residential uses.
Exception Test	<p>The Exception Test should be applied if, following application of the Sequential Test (Flood Risk), it is not possible for the development to be located in zones with a lower probability of flooding. For the Exception Test to be passed it must be demonstrated that:</p> <ol style="list-style-type: none"> <li>1. The development provides wider sustainability benefits to the community that outweigh flood risk; and</li> <li>2. That the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.</li> </ol>
Frontages	These have been identified locally to help maintain the balance between retail and non-retail uses in the town centre.
Fuel Poverty	A fuel poor household is one that cannot afford to keep adequately warm at reasonable cost. This is generally defined as households that need to spend 10% or more of their annual income on energy to keep their home adequately warm.
Functional Floodplain	Undeveloped land and open space that falls within Zone 3 of the Environment Agency Flood Map. Any areas of the borough that are identified as Functional Floodplain are at



the greatest risk of flooding, and fairly regular inundation should be expected.

Gatwick Airport Boundary	The boundary within which airport-related uses are appropriate.
Green Infrastructure	A network of multi-functional green space and waterways and waterbodies, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
Greenhouse Gas	Gases that act to trap heat within the earth's atmosphere, they are produced by burning fossil fuels but do also occur naturally.
Gypsy, Traveller and Travelling Showpeople	<p>Gypsies and Travellers are persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.</p> <p>Travelling Showpeople are members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.</p>
Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment	The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) is a technical study that forms part of the evidence base for the Local Plan. As required by the Housing Act (2004) this document assesses the accommodation needs of Gypsies, Travellers and Travelling Showpeople and outlines how their needs will be met.
Gypsy and Traveller "Pitch"	A 'pitch' refers to a pitch on a Gypsy and Traveller site that provides for residential uses. As a general guide and, in line with national guidance recommendations, the average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, a parking space for two vehicles and a small garden area. The amenity building must include, as a minimum, 'hot and cold water supply; electricity supply; a separate toilet and hand wash basin; a bath/shower room; a kitchen/dining area'. Taking into account the requirements listed above, and, considering the space standards of the borough in relation to the amenity building, an approximate figure of 160 m <sup>2</sup> for each pitch has been established.

Travelling Showpeople “Plot”	A ‘plot’ refers to a pitch on a Travelling Showpeople site (often called a yard) and refers to a mixed-use site suitable for both employment and residential activities.
Heritage Assets	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets either above or below ground and assets identified by the local planning authority (including local listing).
Heritage Impact Assessments	A document that is required as part of a planning application when the development affects a heritage asset, these were previously known as Heritage Statements.
Historic Parks and Gardens	Areas that encompass aesthetic, philosophical, botanic and scientific heritage and embody shared values of landscape and place.
House in Multiple Occupation	A house in multiple occupation (HMO) is a property that is occupied by a number of individuals who share facilities, or do not have exclusive occupation of the whole property. HMO’s generally comprise accommodation where two or more individuals share basic amenities (bath/shower, WC or kitchen).
Housing Market Area	This is a geographical area which is relatively self-contained in terms of reflecting people's choice of location for a new home i.e. a large percentage of people settling in the area will have sought a house only in that area.
Important Views	Specific long or panoramic views of the town as identified through a character assessment of the Borough.
Infrastructure	Includes transport facilities; such as roads, rail stations and bus stations; utility services, including water supply and wastewater and its treatment; waste management and disposal; telecommunications infrastructure; social and community infrastructure such as educational facilities and health facilities, cultural facilities, sports and recreational facilities and open space, parks and play space, libraries, cemeteries, and places of worship; emergency services; and flood defences.
Infrastructure Plan	Local Planning Authorities are expected to work with other Local Authorities and infrastructure providers to assess the quality and capacity of infrastructure within the area, and its ability to meet forecast demands. The Infrastructure Plan will confirm the capacity of infrastructure required to meet the demands of growth within the town anticipated through the Local Plan, and moreover, any mitigation that may be required.

Infrastructure providers	Organisations responsible for the provision of certain types of infrastructure.
Intermediate Housing	Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definitions. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.
Large Developments	Thresholds for larger development, as referred to in Policies CL3 and ST1, include new residential development in excess of 80 units, or other types of development as per the thresholds outlined in the Local Validation Checklist: for example, hotels, 100 beds or more, 50+ bed hospitals, B1 2500sqm, B2 4000sqm and B8 5000sqm.
Listed Buildings	Buildings which appear on a national list due to their special architectural or historic importance. The buildings are protected by law.
Local Biodiversity Action Plans	Each individual Species or Habitat Action Plan has a number of objectives, and details actions to be carried out in order to conserve and enhance populations of particular animal and plant species, or to protect and enhance valuable habitats.
Local Plan	Is the term given to this document. In law this is described as a development plan document adopted under the Planning and Compulsory Purchase Act 2004. It guides development of the local area for the future and was drawn up by the local planning authority in consultation with the community.
Local Planning Authority	The public authority whose duty it is to carry out specific planning functions for a particular area. In this document it tends to refer to Crawley Borough Council.
Local Wildlife Sites	Locally Designated, by independent expert panel, Sussex-Wide sites of particular value for wildlife; previously known as Sites of Nature Conservation Importance. Adopted by local authorities for planning purposes and identified in the Local Plan.
Locally Listed Buildings	Buildings, or structures worthy of protection in the local context due to their historic interest, architectural interest, group and townscape value, intactness, and/or communal value.
Low Carbon Energy	A term attributed to energy generated in a way that produced very low levels of carbon per unit in relation to conventional energy generation techniques.

Low/Zero Carbon Development	Zero carbon developments achieve no net emissions by reducing carbon emissions through use of on-site renewable energy generation, and balancing any imports with exports to the National Grid to achieve a zero balance. Low carbon developments are similar to zero carbon developments, the only difference being that they need to achieve at least a 50% reduction in emissions (where this applies specifically to energy use in buildings).
Main Town Centre Uses	As defined by the NPPF: retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities, the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
Major Development	<p>As defined by the Town and Country Planning (Development Management Procedure) (England) Order 2010, 'major development' means development involving one or more of the following:</p> <ul style="list-style-type: none"> <li>(a) the winning and working of materials or the use of land for mineral-working deposits;</li> <li>(b) waste development;</li> <li>(c) the provision of dwellinghouses where – <ul style="list-style-type: none"> <li>(i) the number of dwellinghouses to be provided is 10 or more; or</li> <li>(ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within subparagraph (c)(i);</li> </ul> </li> <li>(d) the provision of a building or buildings where the floorspace to be created by the development is 1,000 square metres or more; or</li> <li>(e) development carried out on a site having an area of 1 hectare or more.</li> </ul>
Manor Royal	Manor Royal is the Gatwick Diamond's leading business district. For the purposes of the Crawley Local Plan, reference to Manor Royal relates to the area defined as Manor Royal (Policy EC3) on the Local Plan Policies Map. As such, reference within the Local Plan to Manor Royal includes the areas known as Manor Royal Business District (as identified by the Manor Royal Business Group), County Oak (and surrounding employment land), and City Place.
Manor Royal Business District	This is the area of Manor Royal that is represented by the Manor Royal Business Group. This forms part of the wider

	Manor Royal Main Employment Area, alongside County Oak and City Place.
Modal change/shift	The switch between different forms of transport.
National Planning Policy Framework	Sets out the government's planning policies for England and how these are expected to be applied to produce distinctive local and neighbourhood plans that reflect the needs and priorities of their communities.
Nationally described standards	A series of standards that will be introduced at the national level for Local Authorities to adopt.
Neighbourhood	Crawley has grown up on a neighbourhood-by-neighbourhood basis known as the neighbourhood principle. Each neighbourhood is a large planned development, predominantly consisting of housing with a central shopping parade, supported by other facilities, services, and open space to meet the day-to-day needs of the people who live and work there.
Neighbourhood Centres	The area at the centre of a neighbourhood that forms a small economic and cultural core providing facilities for the residents of that neighbourhood.
Neighbourhood Plans	A plan prepared by a Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004). At present, there are no neighbourhood plans being progressed in Crawley.
Network Ready	Network ready, in relation to Decentralised Energy Networks, means that the development is optimally designed to connect to a District Energy Network on construction or at some point after construction, and include the incorporation of site-wide communal energy systems to serve all demand.
New Town	Crawley is known as a New Town, a product of the New Towns Act 1946. The New Towns consisted of a new community that was carefully planned from its inception and is typically constructed in previously undeveloped areas, or by merging several smaller built up areas. This contrasts with settlements that evolve over a long time period.
Noise Sensitive Development	Any dwelling, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other facility or area of high amenity, which may be susceptible to noise.  Also referred to as: Noise Sensitive Receptor.
Northern West Sussex	Primarily consisting of the three administrative areas of Crawley Borough, Horsham District and Mid Sussex District.



	As a Housing Market Area a small area of the southern part of Reigate and Banstead Borough also falls within this description.
Objectively Assessed Housing Need	The amount of new housing required over the Plan period which meets household and population projections and takes account of migration and demographic change (births and deaths). This previously was a process undertaken by individual local authorities. However, it is now calculated using the government's national Standard Method.
Older People	"Older people" is usually the term for people ages 65+ years
Older People's Housing	Specialist housing to meet the needs of older people; including: sheltered, enhanced sheltered, extra care, registered care, as well as bungalows and general housing, including step-free apartments, adapted to meet the needs of maximising the opportunities for assisting older people to retain their independence for as long as possible, including through meeting accessibility standards set out in Part M, category 3 of the Building Regulations.
Open Space Study	An assessment of the needs for open space, sports and recreation facilities and opportunities for new provision.
Open Spaces	Open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
Out of centre	Locations that are situated beyond the Town Centre Boundary, as identified on the Local Plan Proposals Map, are defined as out-of-centre.
Planning Condition	A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.
Planning Obligations	A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.
Playing Field	The whole of the site that encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2010.
Pollution	Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.

Previously developed sites	A site which is or was occupied by a permanent structure, including the curtilage of developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes land that has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.
Primary Shopping Area	A defined area where retail development is concentrated. In Crawley, this comprises the Primary Shopping Frontages, and Secondary Shopping Frontages which are adjoining and closely related to the Primary Shopping Frontage.
Public transport	The term used to refer to trains and buses and other communal forms of transport.
Radiant energy	The term is used particularly when radiation is emitted by a source into the surrounding environment. In this document it refers to the energy from the sun.
Renewable & low carbon energy	Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).
S106 Agreement	An agreement under Section 106 of the Town and County Planning Act which contains legally enforceable obligations to mitigate the impact of development proposals.
Safeguarded Land	Land that was required to be safeguarded by the Airports White Paper 2003, the Aviation Policy Framework 2013 and referred to in the draft Aviation Strategy: Aviation 2050 for the building of a wide spaced runway to the south of Gatwick Airport.
Safeguarded Zone	An area defined in Circular 01/03: Safeguarding of aerodromes. This enables the potential impact of development proposals on navigation systems and the safe operation of aircraft to be assessed.
Sequential Test (Flood Risk)	A national planning policy requirement that seeks to steer new development to areas with the lowest probability of

	<p>flooding. In demonstrating that the requirements of the sequential test have been met, proposals should refer to the NPPF and Planning Practice Guidance, and the Environment Agency Flood Map.</p>
Sequential Test (Main Town Centre Uses)	<p>This applies to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. The test requires applications for main town centre uses to be located in town centres, then in edge-of-centre locations and only if suitable sites are not available should out of centre sites be considered.</p>
Sites of Nature Conservation Importance	<p>Locally important sites of nature conservation adopted by local authorities for planning purposes and identified in the local development plan. Now known as Local Wildlife Sites.</p>
Social Rented Housing	<p>Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.</p>
Standard Method	<p>The government's expected approach to calculating the unconstrained local objectively assessed housing need for an area. The Method is set out in national Planning Practice Guidance. It involves setting a baseline, based on household growth projections and includes an adjustment for affordability. This does not produce the housing requirement.</p>
Standing Structures	<p>In the context of Heritage Assets these can be any type of built historic structure standing above ground including all types of building whether domestic, agricultural, industrial, military or transport-related and in whatever condition whether habitable, in use or ruined and only partially surviving. Such structures can also include street furniture (for example a historic lamp-post), monuments, headstones and war memorials.</p>
Strategic Housing Land Availability Assessment	<p>The Strategic Housing Land Availability Assessment (SHLAA) is a technical study that forms part of the Evidence Base for the Local Plan. It identifies potential housing sites and assesses whether these sites are developable, how many housing units could be accommodated on them and when they could be delivered.</p>
Strategic Housing Market Assessment	<p>The Strategic Housing Market Assessment is an evidence base document which assesses the housing needs of the area. The Strategic Housing Market Assessment identifies</p>

the scale and mix of housing and range of tenures that residents require.

Supplementary Planning Documents	Documents which expand upon identified Local Plan policies to provide more detailed guidance on how the policy should be interpreted and applied.
Sustainability Appraisal	Under the regulations of the Planning and Compulsory Purchase Act 2004, Crawley must undertake a Sustainability Appraisal (SA) of the Local Plan to satisfy independent examination to allow the Plan to be formally adopted. The SA is an ongoing process, which endeavours to identify the social, environmental and economic impacts of planning policies or allocations within a Local Plan.
Sustainable Development	Development that meets the social, economic and environmental needs of the present without compromising the needs of the future.
Sustainability Statement	A document submitted as part of a planning application that sets out how the development has or will achieve the objectives set out in Policy SDC1. The Planning & Climate Change Supplementary Planning Document provides detailed guidance on what should be included in the statement and the level of detail it contains will vary depending on the type and scale of the proposed development.
Sustainable Transport	Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport.
Sustainable Drainage Systems	Designed to control surface water runoff close to where it falls and mimic natural drainage as closely as possible.
Three Bridges Corridor	An area between Three Bridges Station and Crawley Town Centre that offers a selection of older and smaller employment units.
Town Centre	In retail policy terms, the Town Centre is represented by the Primary Shopping Area as identified on the Local Plan Map and defined above.
Town Centre Boundary	The Town Centre boundary is shown on the Local Plan Map, and defines the area within which main town centre uses are focused. It encompasses the Primary Shopping Area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.

Tranquil Areas	Areas sufficiently remote from the visual or audible intrusion of development or traffic to be considered unspoilt by urban influences.
Transport Modelling	A Transport Modelling Assessment is a technical study that forms part of the evidence base for the Local Plan, which assesses the future traffic impact resulting from traffic growth and development on the operation of roads, junctions and transport systems.
Urban Capacity Study	A technical study that forms part of the evidence base for Crawley's Local Plan. The document is used to assess potential employment and housing sites within the town.
Use Class	Land uses as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended).
Viability	Where the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements, when taking account of normal cost of development and mitigation, provide competitive returns to a willing landowner to enable the development to be deliverable.
Water Stress	Water stress occurs when the demand for water exceeds the available amount or when poor quality restricts its use.
Windfall Sites	Windfall sites are potential housing sites which have not been specifically identified as available in the Local Plan process. They normally comprise of sites that have unexpectedly become available for a residential use.



## Abbreviations

AAP	Area Action Plan
AONB	Area of Outstanding Natural Beauty
ASLC	Area of Special Local Character
AQMA	Air Quality Management Area
BREEAM	BRE Environmental Assessment Method
BUAB	Built-Up Area Boundary
CAA	Civil Aviation Authority
CABE	Commission for Architecture and the Built Environment
CHP	Combined Heat and Power
DCLG	Department for Communities and Local Government
DECC	Department of Energy and Climate Change
Defra	Department of Environment, Food and Rural Affairs
DPD	Development Plan Document
EA	Environment Agency
EGA	Economic Growth Assessment
ELAA	Employment Land Availability Assessment
ELT	Employment Land Trajectory
EU	European Union
FRA	Flood Risk Assessment
HER	Historic Environment Record
HMO	Houses in Multiple Occupation
HMA	Housing Market Area
LDS	Local Development Scheme
LEED	Leadership in Energy and Environmental Design
LEP	Local Enterprise Partnership
mppa	Million Passengers Per Annum
NPPF	National Planning Policy Framework
NWS	Northern West Sussex

PPG	Planning Practice Guidance
S106	Section 106 Agreements (see “Planning Obligations” definition)
SA/SEA	Sustainability Appraisal/Strategic Environmental Assessment
SCI	Statement of Community Involvement
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
WSCC	West Sussex County Council

# CRAWLEY LOCAL PLAN PLANNING OBLIGATIONS

## ANNEX

The Crawley Local Plan 2021-37 makes provision to deliver a minimum of 5,320 homes over the next 16 years and with anticipated growth in employment numbers within the borough and at Gatwick Airport, this will place additional demands on infrastructure provision. Developers will, therefore, be expected to contribute to meeting the need for additional infrastructure generated by their development and ensuring cumulative effects are effectively mitigated.

### Planning Legislation

The statutory framework for planning obligations is set out in Section 106 of the Town and Country Planning Act 1990 as amended by Section 12 of the Planning and Compulsory Purchase Act 1991.

The Planning Act 2008 provides the enabling powers for local authorities to apply Community Infrastructure Levy (CIL) to development in order to support the provision of infrastructure in an area. The CIL Regulations 2010 (as amended) were introduced under this legislation.

CIL Regulation 122 sets out that, for a planning obligation to be used as a reason to grant planning application for development, or any part of a development, the obligation must be:

- Necessary to make the development acceptable in planning terms
- Directly related to the development, and
- Fairly and reasonably related in scale and kind to the development

### National Planning Policy Framework

The National Planning Policy Framework (NPPF) confirms that plans should set out the contributions expected from developments. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan (paragraph 34).

Paragraphs 54 – 57 of the NPPF further set out the requirements for use of planning conditions and obligations as part of decision-making. This confirms that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

The NPPF confirms that where up-to-date policies have set out the contributions expected from development, planning applications for developments that comply with them should be assumed to be viable.

### National Planning Practice Guidance

The National Planning Practice Guidance sets out further detail about the use of planning obligations. This confirms that policies for planning obligations should be set out in plans and examined in public. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. The guidance states that evidence of need at the plan-making stage 'can be standardised or formulaic', and that it 'is not appropriate for plan-makers to set out new formulaic approaches to planning obligations in supplementary planning documents or supporting evidence base documents, as these would not be subject to examination.'

### Crawley Borough Local Plan 2021-37

The Crawley Local Plan Review contains policies which set developer requirements. In most instances, the first policy position is that these should be addressed through design and

incorporated on site. However, it is accepted that, in some cases, this is unlikely to be feasible. On this basis, financial contributions will be calculated to support off-site provision elsewhere in order to mitigate the impacts of the development.

The Local Plan is supported by a Whole Plan Viability Study. This informed the council's consideration of potential policies and CIL charging rates from a viability perspective whilst taking into account adopted national policies that may impact on development viability. It was an iterative process, in order to secure the optimum possible approach and ensure the Local Plan secures the necessary requirements in order to make development acceptable in planning terms whilst being viable and deliverable. This concludes that, largely, across borough-wide schemes for mixed residential developments, viability is positive and would support the range of planning obligations anticipated by the Local Plan policies, along with Crawley's Community Infrastructure Levy. For higher density developments on brownfield sites within the Town Centre, particularly, though, viability becomes a concern. On this basis, a bespoke approach has been taken to some of the Local Plan Policies for their application within the Town Centre. This has been carefully considered so as to not undermine the importance of the requirements in order to mitigate against the impacts of the development.

The policies identified in the Plan to have associated developer contributions include:

<b>Policy No.</b>	<b>Policy</b>	<b>Annex Page No.</b>
Policy IN1:	Infrastructure Provision	261
Policy DD1:	Normal Requirements of All New Development	262
Policy DD4:	Tree Replacement Standards	262
Policy OS2:	Provision of Open Space and Recreational Facilities	263
Policy OS3:	Rights of Way and Access to the Countryside	266
Policy EC3:	Manor Royal	266
Policy EC5:	Employment and Skills Development	266
Policy GAT1:	Development of the Airport with a Single Runway	269
Policy H2:	Key Housing Sites	269
Policy H5:	Affordable Housing	270
Policy H6:	Build to Rent	274
Policy GI1:	Green Infrastructure	275
Policy GI3:	Biodiversity and Net Gain	275
Policy SDC2:	District Energy Network	275
Policy EP5:	Air Quality	275
Policy ST1:	Development and Requirements for Sustainable Transport	276

This Annex sets out the calculations for determining the planning obligations and any associated financial contributions (where these are not associated with a case-by-case basis) from these.

#### Supplementary Planning Documents (SPD's)

This Annex should be read in conjunction with the Council's Affordable Housing SPD, Urban Design SPD and Green Infrastructure SPD and their subsequent reviews. These documents provide greater detail on how the contributions will be identified and where they will be directed.

#### Council Expectations and Standards

Generally, unless otherwise agreed, the council will expect the following to be included in the S106 Agreement or Unilateral Undertaking with respect to the procedures for making commuted sum payments:

- The formulae as applied in calculating the amount to be paid as at the date of the application or the date of the Planning Committee resolution.
- Indexation from the date of the Resolution to Grant or Unilateral Undertaking until the date of payment. Indexation will be on an annual basis in accordance with the Retail Price Index.
- The applicant is to notify the council when the payment trigger is reached.
- Penalty interest to be payable on late payments.
- The council will have 10 years in which to spend the capital contribution.

The S106 or Unilateral Undertaking will contain a milestone that triggers the payment of the capital contribution, usually (but not necessarily always) this will be the carrying out of any Material Operation.

When the payment is triggered, the applicant should notify the council that payment is now due. On receipt of the notification, the council will issue an invoice for the amount payable, including any indexation.

#### Standard Occupancy Calculations

Occupancy rates are set out in the table below. Where an outline application is made, the average occupancy rate of 2.5 persons (2011 Census) per dwelling will be used. These are applicable to a number of the contribution calculations for policies set out below, including open space, sustainable transport, and skills

<b>Residential Developments</b>	
<b>Dwelling Size</b>	<b>Occupancy</b>
Studio	1.0
1 bed	1.5
2 bed	2.5
3 bed	2.5
4+ bed	2.8
<b>Commercial Developments (per sqm)<sup>152</sup></b>	
Offices (Use Class E)	1 FTE job per 11m <sup>2</sup>
Industrial (Use Class B2 or E)	1 FTE job per 36m <sup>2</sup>
Warehouse & Distribution (Use Class B8)	1 FTE job per 80m <sup>2</sup>

<sup>152</sup> HCA Employment Density Guide 3<sup>rd</sup> Edition (November 2015)



High Street Retail (Use Class E)	1 FTE job per 19m <sup>2</sup>
Food Superstore (Use Class E)	1 FTE job per 17m <sup>2</sup>
Comparison Goods Superstore/Retail Warehouse (Use Class E)	1 FTE job per 90m <sup>2</sup>
Financial & Professional Services (Use Class E)	1 FTE job per 16m <sup>2</sup>
Restaurant & Café (Use Class E)	1 FTE job per 18m <sup>2</sup>
Hotels (Budget) (Use Class C1)	1 FTE job per 3 bedrooms
Hotels (General – 3 Star) (Use Class C1)	1 FTE job per 2 bedrooms
Hotels (4/5 Star) (Use Class C1)	1 FTE job per 1.5 bedrooms
Cinemas (Sui Generis)	1 FTE job per 90m <sup>2</sup>
Amusement and Entertainment (Use Class E or Sui Generis)	1 FTE job per 70m <sup>2</sup>
Sports Centres and Private Clubs (Use Class E or Use Class F2 or Sui Generis)	1 FTE job per 65m <sup>2</sup>

### Policy Contributions

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

Development will be permitted where it is supported by the delivery and maintenance of necessary infrastructure both on and off-site (Policy IN1).

For individual proposed developments this includes the provision of mitigation to avoid any substantial cumulative effects on the existing infrastructure services (Policy IN1).

The council will charge Community Infrastructure Levy (CIL) on development taking place within the borough in accordance with the council's adopted CIL charging schedule (Policy IN1).

Where appropriate, developer contributions will be sought in the form of planning obligations to address site specific issues, subject to the tests in the CIL Regulations (Policy IN1).

Infrastructure covers a wide range of services and facilities including:

- Transport (covered more in Policy ST1)
- Education
- Health
- Social infrastructure
- Community facilities
- Cultural facilities
- Sports and recreation centres and facilities
- Open space (covered more in Policies OS1, OS2 and OS3)
- Parks and play space (covered more in Policies OS1 and OS2)
- Waste management and disposal
- Libraries
- Cemeteries
- Emergency services
- Places of worship
- Utility services
- Waste water treatment
- Telecommunications Infrastructure (covered more in Policy IN3)
- Flood defences.

It is a fact that development will place additional demands on infrastructure provision and that developers will be expected to contribute to meeting the need for additional infrastructure generated by their development and ensuring the cumulative effects are effectively mitigated.

The borough council will charge developers the Community Infrastructure Levy (CIL) on development, in accordance with the council’s adopted CIL Charging Schedule and the CIL Regulations (2010) as amended.

Section 106 agreements will address relevant site specific issues in accordance with the statutory tests set out in CIL Regulation 122, and the policies identified in this annex.

**Policy DD1: Normal Requirements of All New Development**

Proposals must be supported by a future management and maintenance plan for all shared hard and soft landscaping, semi-public or semi-private areas to ensure these areas become well-established (Policy DD1).

Streetscene improvements, public art, CCTV and access and safety measures (such as fire hydrants), or contributions towards these, will be sought on a site specific basis in accordance with policy and relevant service requirements (Policy DD1).

Public art can highlight what is special or locally distinctive about an area and create cultural assets that help in the creation of interesting streets and spaces.

Major developments will be required to allocate a sum equivalent to 1 per cent of build costs to the commissioning of public art work to be included as part of the scheme, or else as a commuted payment towards offsite provision of public art, where viability allows.

**Policy DD4: Tree Replacement Standards**

Where development proposals would result in the loss of trees, the number of replacements is based on the size of tree to be lost, as set out in Policy DD4.

Where commuted sums are sought in lieu of on-site provision, these will be based on the cost on a per tree, taking account of constraints to planting.

The cost of off-site planting will be based on the cost of a sixteen to eighteen centimetre girth tree measured at 1.5m off the ground, planting, sundries and watering over a five year period.

Where tree planting will occur within a hard paved area, the additional cost of construction for a tree pit must be funded.

The contribution covers the cost of providing the tree pit (where appropriate), purchasing, planting, protecting, establishing and initially maintaining the new tree.

The “open ground” contribution will apply where development results in the loss of council-owned trees in open ground and where the development results in the loss of trees on the development site, and it is unable to provide the required replacement tree planting on site. The council will plant the replacements in a location that contributes to the character and appearance of the borough and regains loss of biodiversity.

The “hardstanding” contribution will apply where new tree planting in hard standing is required off-site to mitigate the impact of development.

Tree in open ground (no tree pit required)	£700
Tree in hard standing (tree pit required)	£3,319

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

Where a development is on existing open space which is not identified as surplus and is required to be replaced through Policy OS1, a S106 agreement will also be sought to secure the replacement open space and to provide and improve the Public Rights of Way network both within the development and connecting to the surrounding countryside (Policy OS2).

Existing playing fields and pitches, unless demonstrated to be surplus to requirements through the evidence base (Playing Pitch Study), are to be replaced with equivalent or better provision in terms of quantity and quality and in a suitable location. Where the council agrees that on-site provision of open space cannot be reasonably provided, the council will seek a financial contribution towards enhancement of existing facilities in order to mitigate the increased demand.

The additional demand for open space, sport and recreation facilities created by new residential development is to be mitigated and addressed through either:

- on-site provision of open space, where the characteristics and location of housing sites allow this to be appropriate; or
- alternatively, where it is agreed this cannot reasonably be provided on-site, as a financial contribution towards the enhancement of existing facilities (or new provision through changing the typology of an open space site) in order to mitigate the increase demand.

This will be proportional to the additional demand and impacts on open space generated by the development, using the borough's open space standards set out in paragraph 7.13 of the Local Plan, and the Open Space and Indoor Sports Facilities Assessments and Playing Pitch Strategy (2020) (and any subsequent updates). A site-specific assessment should be undertaken to determine the existing quantitative, qualitative and accessibility of public open space within the locality of the development.

In addition, the impact of the increased population from residential development on open space and recreational facilities which particularly serve a borough-wide population will be mitigated by the use of the Community Infrastructure Levy.

The table below is a guide as to whether a housing proposal may generate a need for new on-site provision:

Type of Provision	1-9 dwellings	10-49 dwellings	50-199 dwellings	200+ dwellings	Town Centre Residential
Play Space	X	✓	✓	✓	✓
Amenity Green Space	X	✓	✓	✓	✓
Outdoor Sports Space	X	*	✓	✓	*
Allotments	X	*	✓	✓	✓
Parks and Recreation Grounds	X	*	*	✓	X

Type of Provision	1-9 dwellings	10-49 dwellings	50-199 dwellings	200+ dwellings	Town Centre Residential
Natural Green Space	X	*	*	✓	X
<b>KEY:</b>					
X S106 contributions not normally sought.					
* Contribution towards off-site provision may be required.					
✓ On-site provision of facility may be required.					

Higher density development within the Town Centre will be expected to consider opportunities to provide on-site amenity open space, play space and community food growing space. A financial contribution will be expected, proportionate to the associated anticipated increase in population generated by the development, towards strategic sports pitch and ancillary facilities provision. Taking viability into account, higher density town centre developments will not be expected to provide a contribution towards parks and recreation spaces or natural green space. Imaginative design solutions suitable for high density, Town Centre style developments should be considered in meeting the biodiversity net gain requirement on-site (Policy GI3). Where provision of any of the open space typologies required from higher density development is agreed cannot reasonably be provided fully on-site, the council will seek financial contributions.

Contributions for proposals under 10 dwellings will not normally be sought. Whilst these developments will have a small cumulative impact on open space it is not generally expedient to consider on a case-by-case basis as required by the CIL regulations test for planning obligations. In these cases, high quality on-site amenity open space and hard and soft landscaping will be essential as part of the design and layout of the proposal.

Contributions towards children's play space will be expected from all new residential units on schemes of ten dwellings or more. Studio and 1-bed units have an anticipated occupancy calculation of 1 and 1.5 persons respectively. However, this does not negate the council's view that children are often residents of such properties<sup>153</sup>, and in these cases, access to high quality outdoor play space located close to the property is arguably even more critical for the quality of life.

The Table below can be used to calculate the contributions required towards off-site provision.

Type of Provision	A	B	C
	Standard m <sup>2</sup> per person	Cost per m <sup>2</sup>	Contribution per person (A x B)
Play Space	0.7	£170	£119
Amenity Green Space (0.2ha min)	4.5	£15	£67.50
Outdoor Sports Space	12.5	£21	£262.50

<sup>153</sup> Census 2011 records the presence of 575 dependent children permanently resident in studio or single bedroom flats in Crawley, and given worsening affordability in the subsequent period it is considered likely that this number has increased since then.

Type of Provision	A	B	C
	Standard m <sup>2</sup> per person	Cost per m <sup>2</sup>	Contribution per person (A x B)
Allotments	1.5	£30	£45
Parks and Recreation Grounds	13	£72	£936
Natural Green Space	10	£15	£150
Maintenance	Where the council adopts areas of open space, sport and recreational provision, contributions will be sought towards their maintenance to cover a period of 10 years.		

Cost per m<sup>2</sup> is to be used when on-site provision can be provided that partly meets requirements but a contribution towards off-site provision should also be sought, where possible, to meet requirements in full. The following formula will be used to determine outstanding costs:

$$(overall\ requirement\ m^2 - on-site\ provision\ m^2) \times cost\ per\ m^2 = outstanding\ contribution$$

On-site provision and/or contributions towards Amenity Green Space and Natural Green Space can form part of proposals to meet Biodiversity Net Gain requirements for a development (as established by Policy GI3).

Management and maintenance arrangements must be agreed with the council and secured to ensure the long-term usability of the site. In the first instance, the developer is expected to maintain on-site open space provision for up to 10 years, after which arrangements must be put in place for a management company and/or third party to manage the space in perpetuity.

If the developer does not wish to assume responsibility for maintaining the open space, the council may be willing to accept a commuted sum and make arrangements for management of the open space through the council or a third party. Adoption will be subject to the council being satisfied that the facility meets the quality requirements of the council. It is therefore important to agree the specification of the open space/facilities with council at an early stage in the planning process. The Table below provides an indication of the costs of maintaining the different types of open space. The exact maintenance sum will need to be agreed with the council as part of the S106 discussions.

Typology	Annual Cost 2013/14 (£/m <sup>2</sup> )
Children & Young People's Space	£3.67
Parks and Recreation Grounds	£2.20
Outdoor Sports Space	£0.92
Amenity Green Space	£0.62*
Natural Green Space	£0.42
Allotments	£0.13
*maintenance varies significantly, dependent on the exact specification of the space.	

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

Proposals which detract from the character of a right of way or other type of recreational route must adequately mitigate the impacts or provide a new resource of equal or better value (Policy OS3).

This may include the provision of safe and convenient links to nearby rights of way/recreational routes, and/or new or upgraded existing rights of way to multi-functional routes including environmental functions and visual amenity to create benefits for a range of users (Policy OS3).

### **Policy EC3: Manor Royal**

To support ongoing improvements to the Manor Royal environment, a developer contribution will be sought towards public realm improvements.

Where developments involve a net increase in gross internal area in excess of 100sqm, the council will seek a proportionate contribution of £2 per square metre of additional floorspace (GIA) towards public realm improvements in Manor Royal. This will be used towards specified projects identified by the council in liaison with Manor Royal BID, subject to appropriate projects being identified.

It is recognised that for smaller development where the financial contribution sought would be £500 or less, the costs involved in preparing a S106 agreement may mean that it is not expedient to secure a contribution in this way. Where this is the case, the public realm contribution may take the form of appropriate on site provision, to be negotiated with the council.

### **Policy EC5: Employment and Skills Development**

This section relates to Policy EC5 (Employment and Skills Development). It explains how Crawley's Employment and Skills Programme 2019-2024 (and any subsequent updates)<sup>154</sup> will be delivered through the planning process, detailing the obligations and developer contributions that will be sought from major development in order to help improve social mobility, inclusion and address the existing skills gap.

#### Policy Context

Crawley is an economically successful borough at the heart of the Gatwick Diamond, home to around 4,000 active businesses and over 100,000 jobs. However, local residents' average earnings are below those of in-commuters, and they are less likely to access higher-skilled, higher-paid jobs. In a recent social mobility report, State of the Nation, Crawley was ranked 304<sup>th</sup> out of 324 local authorities for low social mobility.

Policy EC5 takes a pro-active approach to addressing what is an identified economic weakness for Crawley, requiring qualifying development to contribute towards addressing the skills gap and improving social mobility.

This is to be achieved through two obligations that will be required from all major development:

- i) Committing at the Planning Application stage to prepare and submit a site specific Employment and Skills Plan, the content of which must be agreed by the council, prior to the commencement of development.
- ii) The making of a proportionate financial contribution towards employment and skills initiatives in Crawley.

For all major development, developers will be required to satisfy parts i.) and ii.) of the policy. The following guidance explains to how this can be achieved.

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<sup>154</sup> Crawley Employment and Skills Programme 2019 – 2024



### Part i) Employment and Skills Plan

At the planning application stage, the applicant will be asked to commit to preparing a site-specific Employment and Skills Plan (ESP) relating to the development. This commitment will form part of the obligations on a planning permission, secured by way of a Section 106 Agreement. The ESP should be prepared by the applicant, in liaison with the council, and must be submitted to and agreed by the council prior to the commencement of development. An advice note has been prepared by the council on the process and content of an ESP (<https://investcrawley.co.uk/employment-and-skills/employments-and-skills-programme>).

### Requirements of Part (ii): Developer Contribution towards Employment and Skills

All major residential and employment developments will be required to make a proportionate financial contribution towards employment and skills initiatives to support those sections of the Crawley workforce who face challenges in accessing employment. The financial contributions will be used by Employ Crawley to fund workplace coordination, training and tailored support that enables individuals to better access employment opportunities, including those arising from development at either the construction or end user phase. This will normally focus on people that have been out of work for a long period of time, or that may possess a lower level of skills who might struggle to access employment or training opportunities without extra support.

The following approach will be used to calculate the financial contribution sought from development. The calculation methodology takes account of local circumstances relating to the employment market and, as appropriate, residential occupation assumptions to ensure that the financial contribution sought is locally specific and proportionate to the type and quantum of development proposed. Please note that the method set out below is the same as that shown in the Employment and Skills Provision Guidance Note.

Where major development incorporates a mix of different uses, the contribution will be calculated on the basis of the individual uses that make up that development. For example, for a mixed use office and residential development, the contribution will be calculated on the basis of both the commercial and residential elements. In all cases, the financial contribution will be secured by way of Section 106 Agreement to be paid upon the commencement of development.

Based on Department for Work & Pensions data, £6,500 is the minimum cost for training, preparing and placing into sustainable employment an unemployed person claiming Employment Support Allowance. This figure is used to inform the amount that would be required by Employ Crawley to provide the necessary training to help support a long-term unemployed individual to access employment, and feeds into the calculation for both commercial and residential developments.

### ***Residential Development, including as part of Mixed Use Development***

For residential development, including residential components of mixed use development, the contribution required is calculated as shown below.

#### **Employment and Skills Contribution from Residential Development**

The Employment and Skills contribution from residential development, including residential components of mixed use development, is based on the following parameters:

- a. minimum cost for supporting an individual to access employment (£6,500);
- b. number of dwellings proposed;
- c. expected adult occupancy rate for those dwellings, these being; 1 adult per studio/1 bed unit; 2 adults per 2/3/4+ bed unit;
- d. proportion of Crawley's working age population with no (or other) qualifications (7.6%)

It is calculated as: **(a x b x c x d) / 2**, this being:

$$(\pounds6,500 \times \text{number of dwellings proposed} \times \text{expected adult occupancy} \times 0.076) / 2$$

For example, for a development of 10 x 1-bedroom flats and 5 x 2-bedroom flats, the financial contribution would be calculated as:

$$(\pounds6,500 \times 10 \times 1 \times 0.076) / 2 = \pounds2,470 + (\pounds6,500 \times 5 \times 2 \times 0.076) / 2 = \pounds2,470 = \pounds4,940$$

### **Commercial Development, including as part of Mixed Use Development**

For commercial development, including commercial components of mixed use schemes, development that would involve a net increase in gross internal area in excess of 1,000sqm will be subject to a proportionate financial contribution towards employment and skills.

The contribution required is based on the following parameters:

- Net increase in Gross Internal Area;
- Standard Occupancy;
- Crawley's resident employment self-containment rate;
- Proportion of Crawley's working age population with no (or other) qualifications;
- Minimum cost for supporting an individual to access employment (£6,500)

Standard Occupancy (b) should first be calculated to feed into the commercial employment and skills calculated. This will vary according to the type of commercial development that is proposed, and should be calculated on the basis on the Standard Occupancy Calculations set out below. For hotel development it will first be necessary to calculate the total number of staff based on a 'per room' assumption. This figure is then divided by the Gross Internal Area to feed into the next part of the formula. Sui Generis development does not have a standard occupancy, and the financial contribution required for Sui Generis development will be subject to negotiation with the council on a case-by-case basis.

### **Standard Occupancy for Commercial Development**

Standard Occupancy for Commercial Development is calculated on the basis below:

Offices (Class E)	1 FTE job per 11sqm
Industrial (Class B2 or E)	1 FTE job per 36sqm
Warehouse & Distribution (Class B8)	1 FTE job per 80sqm
High Street Retail (Class E)	1 FTE job per 19sqm
Food Superstore (Class E)	1 FTE job per 17sqm
Comparison Superstore/Retail Warehouse (Class E)	1 FTE job per 90sqm
Financial & Professional Services (Class E)	1 FTE job per 16sqm
Restaurant & Café (Class E)	1 FTE job per 18sqm
Hotels (Budget) (Use C1)	1 FTE job per 3 bedroom
Hotels (General – 3 Star) (Class C1)	1 FTE job per 2 bedroom
Hotels (4/5 Star) (Class C1)	1 FTE job per 1.5 bedroom
Cinemas (Sui Generis)	1 FTE job per 90sqm
Amusement and Entertainment (Class E or Sui Generis)	1 FTE job per 70sqm
Sports Centres and Private Clubs (Class E or Class F2 or Sui Generis)	1 FTE job per 65sqm

As identified in the Northern West Sussex Economic Growth Assessment 2020, Crawley has a total working population of 55,676 people, of which 36,583 people live and work within the borough<sup>155</sup>. This figure, 65.7%, represents **(c) the resident employment self-containment rate**.

In relation to **residential qualification levels (d)**, 92.4% of Crawley residents of working age are qualified to at least NVQ1 or above. This means that 7.6% of Crawley's working age population have no (or other) qualifications. It is these people that are most likely to face challenges in accessing sustainable employment, and who will require support in accessing the training or the employment market.

### **Employment and Skills Contribution from Commercial Development**

The Employment and Skills contribution from commercial development, including commercial components of mixed use development, is based on the following parameters:

- a) Net increase in Gross Internal Area;
- b) Standard Occupancy;
- c) Crawley's resident employment self-containment rate (65.7%);
- d) Proportion of Crawley's working age population with no (or other) qualifications (7.6%);
- e) Minimum cost for supporting an individual to access employment (£6,500)

The contribution required should be calculated according to the type of development, on the basis below:

#### Commercial Development (excluding Office and Hotel uses)

**(a/b) x c x d x e**, this being:

**(Net increase in Gross Internal Area / Standard Occupancy) x 0.657 x 0.076 x £6,500**

For example, for a Class B2 industrial development of 1,000m<sup>2</sup> net increase in gross internal area, the financial contribution would be calculated as:

**(1,000 / 36) x 0.657 x 0.076 x £6,500 = £9,015.50**

#### Office Development

The equation applied for offices is the same as that used for commercial, though for reasons of viability, the final output is halved. The equation is therefore:

**(a/b) x 0.657 x 0.076 x £6,500 / 2**

For example, for a Class E office development of 1,000m<sup>2</sup> net increase in gross internal area, the financial contribution would be calculated as:

**(1000 / 11) x 0.657 x 0.076 x £6,500 / 2 = £14,752.63**

#### Hotel Development

For hotel development, it is first necessary to identify the anticipated number of staff, which is calculated on a ratio of staff per room, depending on the type of hotel. This is calculated on the basis of:

**(Number of Rooms / Standard Occupancy) = z**

**(a / z) x 0.657 x 0.076 x £6,500**

For 150 bedroom budget hotel development of 1,000m<sup>2</sup> net increase in gross internal area, the financial contribution would be calculated as:

**(150 / 3 = 50 staff)**

**(1,000 / 50) x 0.657 x 0.076 x £6,500 = £6,491.16**

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

The control or mitigation of impacts, compensation, infrastructure and benefits of growth at the Airport will be secured through appropriate planning conditions and/or S106 obligations (Policy GAT1).

### **Policy H2: Key Housing Sites**

A number of Key Housing Sites have been identified with specific requirements:

<sup>155</sup> Source: ONS census 2011/Lichfields analysis

- **Tinsley Lane Housing and Open Space Site** (includes the replacement of Oakwood Football Club; the provision of a senior football pitch and facilities; a junior 3G football pitch; community use arrangements for the sports pitch facilities; enhancement and management for public access of Summersvere Woods; on-site publicly accessible play space and amenity greenspace; and provision of allotments).
- **Breezehurst Drive Playing Fields Housing and Open Space Site** (includes the retention of good quality pitch provision to the south of the pavilion; provision of enhanced pitch drainage off-site; new or retained provision of changing facilities; and allotments).
- **Henty Close Housing and Open Space Site** (includes the replacement play area of equivalent or better quantity and quality in a suitable location).
- **Rushetts Road Housing and Open Space Site** (includes the replacement play area of equivalent or better quantity and quality in a suitable location).
- **Land East of Balcombe Road/Street Hill Housing, Biodiversity and Heritage Site** (includes the long-term commitment to the ecological enhancement and proper management of the remainder of the Local Wildlife Sites for the benefit of biodiversity, and adequate mitigation and compensation measures provided to offset any harm caused to the site's important assets).

### **Policy H5: Affordable Housing**

Policy H5 requires 40% affordable housing from all residential developments which fall outside the Town Centre.

The council expect a minimum of 75% of the affordable housing to be Affordable Rent, or Social Rent where other forms of subsidy exist, and up to 25% as Shared Ownership.

This equates to 30% of the total scheme for Affordable/Social Rent and 10% of the total scheme as Shared Ownership.

For sites of 10 dwellings or less, a commuted sum towards off-site affordable housing provision will be sought, unless on-site provision is preferred, with the on-site tenure mix to be agreed.

#### Crawley Town Centre

For residential developments within the Town Centre, Policy H5 requires 25% affordable housing.

The council will expect 60% of the affordable housing in the Town Centre to be Social Rent and/or Affordable Rent, and up to 40% as Intermediate Tenure, to include either Shared-Ownership, Shared-Equity or Affordable Home Ownership tenures.

#### Exceptions

Policy H5 states that, except for sites of 10 dwellings or less, payments in lieu will only be accepted in exceptional circumstances where it can be demonstrated that there are robust planning reasons for doing so and provided that the contribution is of equivalent financial value.

For high density schemes elsewhere in the borough, as defined in Policy CL4 (i), and falling outside of the Town Centre, should viability evidence be provided to justify similar levels of affordable housing to that required in the Town Centre, this will be considered with claw-back mechanisms in place to secure higher levels of affordable housing provision, up to the Policy level of 40% should viability improve during the period of development construction, or in exceptional circumstances an off-site commuted payment in lieu may be considered.

The council will only consider relaxing this affordable housing requirement, in part or in full, in exceptional circumstances, where a scheme is clearly subject to abnormal costs, not including land costs, and not otherwise envisaged by the Local Plan Viability Assessment,

and where this is evidenced by robustly assessed viability. The scheme must also evidence that it addresses a demonstrative and immediate housing need. In such situations, the scheme is expected to appraise various permutations of affordable housing provisions to best address local affordable housing needs, 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.

Build to Rent will also be considered as an exception while it remains all for rent, and is further detailed in Policy H6, which will revert back to Policy H5 should such schemes cease to be predominantly private rental.

Rent to Buy is considered as an exceptional Intermediate Tenure that may be considered only in exceptional circumstances where it can be evidenced to address local housing needs, and will not be considered as a rental tenure.

#### Mechanism to Secure the Delivery of Affordable Housing

Section 106 Planning Agreements (or Unilateral Undertakings) will be required to secure the delivery of affordable housing. The council will expect affordable housing to receive free serviced land as a starting point, whereby the Registered Provider receives transfer of the built-out units at a price commensurate with the affordable tenure or under special circumstances receives free transfer of serviced land at an equivalent aggregate value. The S106 Agreement will require applicants to provide an Affordable Housing Scheme setting out the provisions of affordable housing in keeping with this Policy requirement (para. 13.31).

Where exceptional circumstances result in the council accepting an off-site commuted payment, the basic rationale will be for the council to secure a capital contribution that would be at a minimum equivalent to free-serviced land, and should reflect the cost to the development had affordable housing been provided on-site. The approach to be taken in calculating the financial contribution is based on a Square Metre Levy.

This is an approach whereby a square metre levy is applied across the whole development aimed at securing an appropriate proportion of the build area towards the provision of affordable housing on an alternative site. This approach seeks to achieve a value equivalent to free-serviced land for the proportion of affordable housing that would otherwise have been provided on-site. For Crawley, a land-value tariff of £350 p/sqm is considered appropriate.

#### **Square Metre Levy:**

$$\text{GIA} \times [\text{£}350] \text{ p/m}^2 = \text{Commutated sum}$$

**Note:** The key variables of [£350] per square meter and [30%] of gross development value applies in full from [11] units upwards.

To address any 'disproportional burden', these variables on smaller schemes of [10 units or less] are 'discounted' on a sliding scale, the first unit starting at [one-third] of these respective values.

[Affordable Housing Calculator](#)

<b>Key Variables:</b>				Value Equal to % AH
Free land to m2:		£350		
Free land to OMV:		30%		
Policy Requirement:		40%		
Units	% of OMV	Units	m2 tariff	% AH
1	10.0%	1	£116.67	13%
2	12.0%	2	£140	16%
3	14.0%	3	£163	19%
4	16.0%	4	£187	21%
5	18.0%	5	£210	24%
6	20.0%	6	£233	27%
7	22.0%	7	£257	29%
8	24.0%	8	£280	32%
9	26.0%	9	£303	35%
10	28.0%	10	£327	37%
11	30.0%	11	£350	40%
12	30.0%	12	£350	40%
13	30.0%	13	£350	40%
14	30.0%	14	£350	40%
15	30.0%	15	£350	40%

**Key Variables – Model Assumptions:**

1. Free Land to m2: £350 notional value of free serviced land for the 40% affordable housing quota.
2. Free Land to OMV: 30% of market value of the 40% affordable housing quota, equating to a notional value of free serviced land, for 11+ units, with a sliding discount applied from 1-10 units.

<b>Indicative Scheme for modelling purposes only:</b>				
Unit type	units	m2	circulation	Total m2
Studio Flat	0	37	20%	0
1b/2p Flat	2	50	20%	120
2b/3p Flat	0	62	20%	0
2b/4p Flat	2	70	20%	168
2b/4p House	2	79	0%	158
3b/5p House	0	95	0%	0
4b/6p House	0	106	0%	0
	<b>6</b>			<b>446</b>



<b>Affordable Housing [on-site/off-site] Calculator</b>	
Total number of residential units:	6 units
Total Gross Internal Area (GIA):	446 m <sup>2</sup>
Number of affordable units applicable:	2.4 AH units
<b><u>Commuted Payment Due:</u></b>	
<b>Square meter levy</b>	<b>£104,067 @ £233 p/m<sup>2</sup></b>

Normally, for schemes of one to ten dwellings payments shall be made on occupation of the first property. For schemes of 11 dwellings or more, the payment schedule will be 50% on commencement and 50% upon occupation of the first market units, unless otherwise agreed. Indexation will continue until the final payment is made.

The council may spend the capital contribution in any part of the borough, or within developments beyond Crawley's administrative boundary where the council secures nomination rights to affordable housing, for the provision of and/or improvements to affordable housing.

*Approach for Small Sites:*

Where financial contributions are sought (including for calculating the value for on-site tenure options in developments of six to ten new dwellings), the Affordable Housing Calculator has a built-in sliding scale discount, to ensure the contribution required remains proportionate and viable for smaller developments. For smaller schemes (ten dwellings or less) payment is accepted at the point of first occupation in order to aid cash-flow constraints.

On smaller schemes of 10 units or less the starting point will be to establish the capital value of the expected affordable housing contribution using the Affordable Housing Calculator. This will determine the commuted sum payable on schemes of 5 residential units or less, unless the applicant wishes to consider on-site provision whereby the approach detailed below will also apply.

For schemes in the range of 6 to 10 residential units, the capital contribution established by the Affordable Housing Calculator for on-site provision will be modelled by the council to determine the most appropriate on-site use of this resource to address local housing needs while taking into account practical considerations and constraints.

The council's options would then be to apply this capital value across the available affordable housing units as either Discounted Market Sale or Shared-Equity, which would not require the involvement of a Registered Affordable Housing Provider. Alternatively, with the involvement of a Registered Affordable Housing Provider, the options available to the council would then include either Shared-Ownership or Affordable Rent. The council may choose to apply this capital value over fewer affordable units than are due in order to improve the affordability of the affordable units.

**For example:**

A scheme comprising of 6 residential units (2 x 1b/2p flats, 2 x 2b/4p flats, and 2 x 2b/4p houses) would have:

- an affordable housing requirement of 2.4 affordable units;
- which would be equivalent to a capital contribution towards affordable housing ranging between £104,067 and £119,953.
- This is based on 446m<sup>2</sup> GIA and almost £1.5m GDV, depending on which option is applied.

In addition, to further reduce disproportionate burdens on smaller developments, the council will seek to simplify viability assessment requirements. If a viability or delivery problem is accepted, then the council will consider:

- i. Varying mix/tenure split;
- ii. Varying payment timing;
- iii. Reducing percentage of affordable and/or applying a lower sum to the off-site calculation.

### **Policy H6: Build to Rent**

Build to rent schemes are regarded as an exception to Policy H5, whereby Policy H5 will be deferred for as long as the scheme remains all-rental, during which time Affordable Private Rent is expected on the following basis:

- i. Schemes shall incorporate an element of Affordable Private Rent comprising:
  - 20% of dwellings in schemes within the town centre, or
  - 30% of dwellings in schemes elsewhere in the borough.

In both settings rentals will not exceed either 80% of market rent values or Local Housing Allowance rates, and shall be offered to the council for qualifying nominations on an Assured Shorthold Tenure (AST) basis. Under no circumstances will less than 20% affordable private rent be provided in line with NPPF guidance.

- ii. A deferred Affordable Housing Scheme is to be identified, for future provision in the event that the scheme ceases to be all-rental, in accordance with the requirements of Policy H5 (as applicable to the location of the development).

The deferred Affordable Housing Scheme will be triggered and delivered in the event that the scheme ceases to be all-rental, and shall be disposed of to a Registered Provider at their best consideration (Policy H6).

To accommodate this particular investment model, and where ongoing management is to be provided in a fully rented scheme, the council will not require a Registered Provider to take on the affordable units, and council is prepared to defer the intermediate tenure requirement of the policy for as long as the scheme remains all-rental (para. 13.37).

In such circumstances, the council will require the rentals to be made available at affordable rent levels, not exceeding 80% of the equivalent open market values and not exceeding Local Housing Allowance rates, and the council will enter into a Lettings Agreement to allow for nominations to be made into the affordable private rented units (para. 13.38).

The scheme will be expected to enter into a S106 Agreement that will remain with the land, and in the event that the scheme ceases to be all-rental the S106 Agreement will require the affordable units, including the deferred intermediate tenure properties, to be made available to Registered Providers in line with the council's affordable housing policy, which shall include any claw-back provisions in the event that the council allows any concessions to the affordable housing policy requirements (para. 13.39).

A planning obligation will be sought for the following purposes detailed in Policy H6 in respect of the rental scheme:

- Securing the status of the units as Build to Rent for at least 15 years;
- Securing the unified ownership and unified management across the Build to Rent scheme, embracing both Market Rent and Affordable Private Rent units;
- Affordable housing requirements (including review mechanisms where appropriate) and regular provision of evidence of compliance by the scheme operator;
- Securing council nomination rights in respect of the affordable units through an agreed Deed of Nomination;
- Clawback mechanisms to secure compensation in the event of the loss of Market Rent homes before the expiry of the covenant period;
- Site management arrangements.

### **Policy GI1: Green Infrastructure**

Policy GI1 states that proposals which reduce, block or harm the functions of green infrastructure should be avoided. Any loss will be required to be adequately justified, minimised, and mitigated against or as a last resort compensated for to ensure the integrity of the green infrastructure network is maintained.

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.

Large proposals will be required to provide new and/or create links to green infrastructure where possible.

### **Policy GI3: Biodiversity and Net Gain**

All development proposals will be expected to incorporate features to encourage biodiversity and enhance existing features of nature conservation value within and around the development. Development will be required to demonstrate how it will meet the government's requirement for securing a 'net gain' in biodiversity. As a minimum, all development proposals will be required to achieve a net gain for biodiversity in accordance with government expectations<sup>156</sup>: a 10% increase in habitat value for wildlife compared with the pre-development baseline (Policy GI3).

In the first instance, net gain for biodiversity will be expected to achieve a minimum 10% increase on site. Only where it is clearly justified this is not practicable to achieve, and where it is shown to have been considered and sought from the early stages of the design and layout of the development, will off-site provision, in the form of equivalent financial contributions, be agreed.

Defra and Natural England have worked together to prepare and consult on a Biodiversity metric 2.0: <https://consult.defra.gov.uk/natural-england/the-biodiversity-metric-2-0/>

The responses received have been published:

<http://publications.naturalengland.org.uk/publication/5850908674228224>

The Natural England link above provides more information on the Biodiversity Metric 2.0 as well as the tools and user guides required to understand the metric 2.0. It also includes the project specific calculation tool.

It is anticipated that the final version of the Biodiversity Metric will be published in December 2020.

### **Policy SDC2 District Energy Networks**

Where a connection to an existing District Energy Network is proposed, the council may secure the implementation of this by means of a planning obligation.

### **Policy EP5: Air Quality**

Development that may reasonably be considered to impact upon air quality, will be expected to contribute towards achieving a reduction in levels of air pollution, and should demonstrate how this will be achieved through an Air Quality Assessment (Policy EP5).

### **Emissions Mitigation Calculation**

The purpose of an emissions mitigation assessment is to:

- 1) calculate the additional transport emissions associated with a development;
- 2) determine the appropriate level of mitigation required to help avoid, minimise and/or offset the impact on air quality.

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<sup>156</sup> Government's Environmental Bill (2019)

The calculation methodology is provided in the latest version of the [Air Quality and Emissions Mitigation Guidance for Sussex](#). In summary, the calculation is a two stage process:

**Step 1** uses the DEFRA Emissions Factor Toolkit (EFT) to estimate the transport emissions of NO<sub>x</sub> and PM<sub>2.5</sub> from a proposed development (over a 5 year period)

<http://laqm.defra.gov.uk/review-and-assessment/tools/emissions.html>

**Step 2** uses the output data from the EFT to estimate the associated health damage cost from each of these pollutants (over a 5 year period) using the Defra Damage Cost Appraisal Toolkit (DCAT)

<https://www.gov.uk/guidance/air-quality-economic-analysis#damage-costs-approach>

The sum of the health damage cost from both pollutants (NO<sub>x</sub> and PM<sub>2.5</sub>) provides the total emissions mitigation value to be applied to practical mitigation measures.

### **Policy ST1: Development and Requirements for Sustainable Transport**

For development which generates a significant demand for travel, and/or is likely to have other transport implications contributions to improved sustainable transport infrastructure off-site will be required. This may include, where appropriate, bus priority measures, enhanced passenger information, and routes identified in the council's Local Cycling and Walking Infrastructure Plan (Policy ST1).

A contribution will be sought from major residential and commercial developments including new buildings outside of the Gatwick Airport Boundary as follows:

**Contribution = notional unit cost of infrastructure x proportion of infrastructure catchment arising from the development x notional distance covered by scheme (rounded to the nearest £1)**

Where:

**Notional unit cost of infrastructure** = £375,000 (the cost per km of providing a notional cycling/walking route)

**Proportion of infrastructure catchment arising from the development** = a fraction calculated in the following way:

- In Manor Royal:  $O / (O + 13,931^*)$
- Outside Manor Royal:  $O / (O + 4,000^\dagger)$

Where O = the net additional occupancy generated by the development, based on the development type, and calculated in accordance with the Standard Occupancy Calculations set out above.

**Distance** = the higher figure of either 0.5 km or the distance (to the nearest 0.1km) by foot or bicycle between the development site and the nearest of either a railway station OR a stop on the high frequency, quality bus corridor identified in Policy CL4.

**No contribution will be sought where the amount calculated using this method falls below £500 for the entire development.**

\*13,931 is a notional catchment figure for sustainable transport infrastructure projects in Manor Royal, representing half of the working population of the Business District.

†4,000 is a notional catchment figure for sustainable transport infrastructure projects in Crawley's neighbourhoods, representing roughly half of the average population of a Crawley neighbourhood.

**Worked Example 1:**

50-dwelling town centre residential scheme comprising 15 1-bed dwellings, 23 2-bed dwellings, 10 3-bed dwellings and 2 4-bed dwellings, located within 0.5km of a railway station/high frequency bus corridor.

Occupancy is as follows:

$$15 \text{ 1-bed dwellings} = 15 \times 1.5 = 22.5$$

$$23 \text{ 2-bed dwellings} = 23 \times 2.5 = 57.5$$

$$10 \text{ 3-bed dwellings} = 10 \times 2.5 = 25$$

$$2 \text{ 4-bed dwellings} = 2 \times 2.8 = 5.6$$

$$\text{Total} = \mathbf{111} \text{ (rounded up from 110.6)}$$

Thus the proportion of infrastructure catchment arising from the development is calculated as follows:

$$111 / (111+4000) = 111 / 4111 = 0.02700073$$

The contribution should therefore be calculated as follows:

$$£375,000 \times 0.02700073 \times 0.5 = \mathbf{£5,063} \text{ (to the nearest £)}$$

**Worked Example 2:**

2000sqm office building in Manor Royal within 1km of a railway station/high frequency bus corridor.

Occupancy is as follows:

$$2000\text{sqm office} = 182 \text{ FTE workers at 1 worker per 11 sqm (rounded up from 181.8182).}$$

Thus the proportion of infrastructure catchment arising from the development is calculated as follows:

$$182 / (182+13931) = 182 / 14113 = 0.01289591$$

The contribution should therefore be calculated as follows:

$$£375,000 \times 0.01289591 \times 1 = \mathbf{£4,836} \text{ (to the nearest £)}$$

**Worked Example 3:**

1000sqm storage and distribution building in Manor Royal within 0.5km of a railway station/high frequency bus corridor.

Occupancy is as follows:

$$1000\text{sqm storage and distribution} = \mathbf{13} \text{ FTE workers at 1 worker per 80sqm (rounded up from 12.5).}$$

Thus the proportion of infrastructure catchment arising from the development is calculated as follows:

$$13 / (13+13931) = 13 / 13944 = 0.0009323$$

The contribution should therefore be calculated as follows:

$$£375,000 \times 0.0009323 \times 0.5 = \mathbf{£175} \text{ (to the nearest £) – therefore no contribution as amount is less than £500.}$$

Further planning obligations may be used to secure:

- sustainable transport measures or mitigation identified as part of an agreed Travel Plan or Mobility Strategy;
- mitigation of residual impacts on the highways network.

# CRAWLEY LOCAL PLAN PARKING STANDARDS ANNEX

The standards set out below are indicative minimum standards, setting out the level of provision which the council will generally expect in new developments.

Where a lower level of provision is proposed, the council will expect this to be justified on site-specific grounds, including (where appropriate) evidence concerning the accessibility of the location.

Evidence should be provided to demonstrate where overflow parking demands can be accommodated (on-street or elsewhere), that there is sufficient capacity for these demands to be met and that mitigation can be provided where necessary to ensure that overflow parking would not create a highway safety issue. This could include, where appropriate, measures included in a Travel Plan or Mobility Strategy, the funding of additional waiting restrictions, or restrictions on the ability of occupants of new development to qualify for residents and visitors parking permits.

The associated car parking zone maps can be found at the end of this Annex. These maps are not to scale. For a scaled version please download the electronic copy found on the council website.

## **Residential Uses**

Parking standards for residential development are based on likely demand in terms of car ownership, taking into account the accessibility of the area by modes of transport other than the car. Other factors that will be taken into account include age, household types and the type of housing.

## **Dwellings**

The standards and associated parking behaviour zones in respect of dwellings are consistent with the West Sussex County Council Guidance on Parking at New Developments (2019). The zones are based on (pre-2019) ward boundaries, and accordingly the standards should be applied flexibly where there are significant variations in parking demand within a zone, for example, where there are clear variations in density between neighbouring areas of housing, or in those zones which include parts of the Town Centre, where significantly lower levels of demand and parking will be expected. (Please note figures for Parking Behaviour Zone 1 which mainly applies to rural areas have not been included as no areas within Crawley are identified as falling within that zone.)

<b>Residential Parking Demand (spaces per dwelling)</b>					
<b>Number of bedrooms</b>	<b>Number of habitable rooms</b>	<b>Parking Behaviour Zones</b>			
		<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>
<b>1</b>	<b>1 to 3</b>	<b>1.4</b>	<b>0.9</b>	<b>0.9</b>	<b>0.6</b>
<b>2</b>	<b>4</b>	<b>1.7</b>	<b>1.3</b>	<b>1.1</b>	<b>1.1</b>
<b>3</b>	<b>5 to 6</b>	<b>2.1</b>	<b>1.8</b>	<b>1.7</b>	<b>1.6</b>
<b>4+</b>	<b>7 or more</b>	<b>2.7</b>	<b>2.5</b>	<b>2.2</b>	<b>2.2</b>

### *Notes:*

*The standards are per dwelling, and do not distinguish between flats and houses.*

*The boundaries of the zones are shown on zone plans. These boundaries are indicative only, and consideration will be given to applying similar standards in close proximity to the boundaries.*

*In the case of an application to extend a dwelling, additional parking may be required in accordance with these standards.*

*Where it is proposed that parking spaces will be allocated to individual dwellings, the parking provision should include allowance for visitor parking and/or flexible, unallocated spaces as appropriate to the circumstances of the site, so as to ensure efficient use of space.*

*Habitable rooms include all rooms used for cooking, eating, sleeping and living.*



## Other residential uses

Description	Use Class	Standard
Sheltered accommodation and flats for the elderly *		1 space per 2 units, plus staff space
Care and residential nursing homes	C2	1 space per 20 residents and; 1 visitor space per 8 residents and; 1 staff space per 5 residents
Houses in multiple occupation		0.5 spaces per unit
Hostels		1 space per 4 residents 1 visitor space for every 20 residents

\* Sheltered accommodation is where development is provided with internal communal facilities and warden accommodation. In other cases the residential standard will apply.

## Offices Use Class E

In order to reflect different levels of accessibility within the town, a zonal approach to applying parking standards for office development is adopted. The three zones are:

1. the Town Centre;
2. around Three Bridges Station; and
3. Manor Royal.

The boundaries of the three zones are set out on the attached maps.

Zone 1 – Town Centre	Zone 2 – Three Bridges	Zone 3 – Manor Royal	Other locations
1 space per 41m <sup>2</sup>	1 space per 35m <sup>2</sup>	1 space per 31m <sup>2</sup>	1 space 30m <sup>2</sup>

Notes:

*These standards are indicative and are intended to reflect likely demand. Provision below these standards may be acceptable if it can be demonstrated how the total access needs of the development can be met.*

*The suggested boundaries of the zones are shown on zone plans. These boundaries are indicative only, and consideration will be given to similar standards in close proximity to the boundaries.*

## Other Industrial and Retail Uses

	Use Class	Car Parking	Lorry Parking
Food retail *	E	1 space per 14m <sup>2</sup>	
Non-food retail *	E	1 space per 20m <sup>2</sup>	
Financial services	E	1 space per 30m <sup>2</sup>	
Restaurants, cafes	E	1 space per 5m <sup>2</sup> public area and 2 spaces per bar for staff	
Research and development/ Light Industry	E	Assessed individually. A lower level of parking than in equivalent office uses will typically be expected.	
Industrial	B2	1 space per 40m <sup>2</sup>	1 space per 500m <sup>2</sup> . 1 space minimum
Warehousing	B8	1 space per 100m <sup>2</sup>	1 space per 500m <sup>2</sup> . 1 space minimum

\* For extensions and small shop units under 100m<sup>2</sup> – no spaces will be sought.

## **Other Uses**

Any uses not listed in the following table will be considered on their own merits.

		<b>Car Parking</b>	<b>Lorry Parking</b>
Car sales		1 space per 30m <sup>2</sup> of internal and external gross display area. Staff spaces to be clearly designated.	On merits but to include space for off-loading car transporters
Motor repair garages		1 space per 45m <sup>2</sup> for staff and 3 spaces per service bay (or 25m <sup>2</sup> ).	Assessed individually
Places of assembly/leisure	E or F2 or Sui Generis	1 space per 22m <sup>2</sup>	
Large scale places of assembly serving more than a local catchment		1 space per 15m <sup>2</sup>	
Cinemas and conference facilities		1 space per 5 seats	
Stadia		1 space per 15 seats	
Vets and medical centres		1 space per practitioner plus 4 spaces per consulting room plus 1 space per 20m <sup>2</sup> of office space	
Hotels and guesthouses		1 space per bedroom	
Schools		Assessed individually within the context of a travel plan using 1 space per 2 staff as a guide	
Higher and further education		1 space per 2 staff 1 space per 15 students	
Children's Nurseries		Assessed individually using 1 space per 2 staff as a guide with provision for dropping off	
Playing fields		12 spaces per hectare	
Hospitals		Assessed individually based on a travel plan	
Garden centres		1 space per 20m <sup>2</sup> for covered sales 1 space per 30m <sup>2</sup> for uncovered sales	Under 1,000m <sup>2</sup> – 2 spaces Over 1,000m <sup>2</sup> – 3 spaces
Wholesale cash and carry		1 space per 50m <sup>2</sup>	1 space per 200m <sup>2</sup>
Open storage		1 space per 100m <sup>2</sup>	Assessed individually
Tennis, badminton and squash courts		2 spaces per court	
Swimming pools		1 space per 10m <sup>2</sup> of pool area	

		<b>Car Parking</b>	<b>Lorry Parking</b>
Golf courses		4 spaces per hole	
Riding schools/ stables		2 spaces per loose box	
Indoor equestrian centres		1 space per 20m <sup>2</sup> of arena	1 space per 150m <sup>2</sup> of arena

### **Disabled Parking**

The Department for Transport has published guidance entitled “Inclusive Mobility”: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (December 2002).

This document includes technical advice on a range of mobility/access related issues, including recommended standards for parking provision. Additional guidance is provided in the government publication ‘Manual for Streets’

<https://www.gov.uk/government/publications/manual-for-streets>.

For employment uses - a minimum of one space or 5% of total parking provision.

For car parks associated with shopping areas, leisure, recreation and places open to the general public - a minimum of one space per disabled employee plus 6 percent of total capacity.

### **Electric Vehicle Charging Infrastructure**

Until the introduction of national requirements for EV charging infrastructure in new developments, through Building Regulations or otherwise, provision should be made as follows:

- ‘Active’ charging points for electric vehicles should be provided on a set proportion of car parking spaces, in accordance with the following table. This is based on West Sussex County Council Guidance on Parking at New Developments (2019), and is informed by the government’s intention that 50% - 70% of new car sales should be ultra low-emission by 2030;
- Ducting provided at all remaining spaces where appropriate to provide ‘passive’ provision for these spaces to be upgraded in future.

<b>Year</b>	<b>Proportion of ‘active’ charging points</b>
2020	28%
2021	33%
2022	37%
2023	41%
2024	45%
2025	49%
2026	53%
2027	58%
2028	62%
2029	66%
2030	70%

### **Car Parking Space Sizes**

The dimensions of parking spaces should follow guidance set out in ‘Manual for Streets’ (see link above). Perpendicular car parking spaces should have a minimum width of 2.4m and a minimum length of 4.8m.

### **Cycle Parking**

All cycle parking must be sheltered and secure and in accordance with local guidance and best practice design. However, flexibility and innovation will be encouraged. It is essential that cycle parking is considered carefully within the design of new development.

### **Non Residential Uses**

<b>Use class</b>		<b>Staff</b>	<b>Visitors</b>
Retail uses	E	1 space per 100m <sup>2</sup>	1 space per 100m <sup>2</sup>
Financial services	E	1 space per 100m <sup>2</sup>	1 space per 200m <sup>2</sup>
Restaurants/Takeaways	E	1 space per 4 staff	1 space per 25m <sup>2</sup>
Offices	E	1 space per 150m <sup>2</sup>	1 space per 500m <sup>2</sup>
Industrial	B2	1 space per 200m <sup>2</sup>	1 space per 500m <sup>2</sup>
Warehousing	B8	1 space per 500m <sup>2</sup>	1 space per 1000m <sup>2</sup>
Places of assembly and leisure	E or F2 or Sui Generis	1 space per 4 staff	Assessed individually

### **Residential Uses**

No additional cycle parking spaces will be required where a garage is provided.

One bed dwellings -

One space per dwelling and 1 space per 8 dwellings for visitors

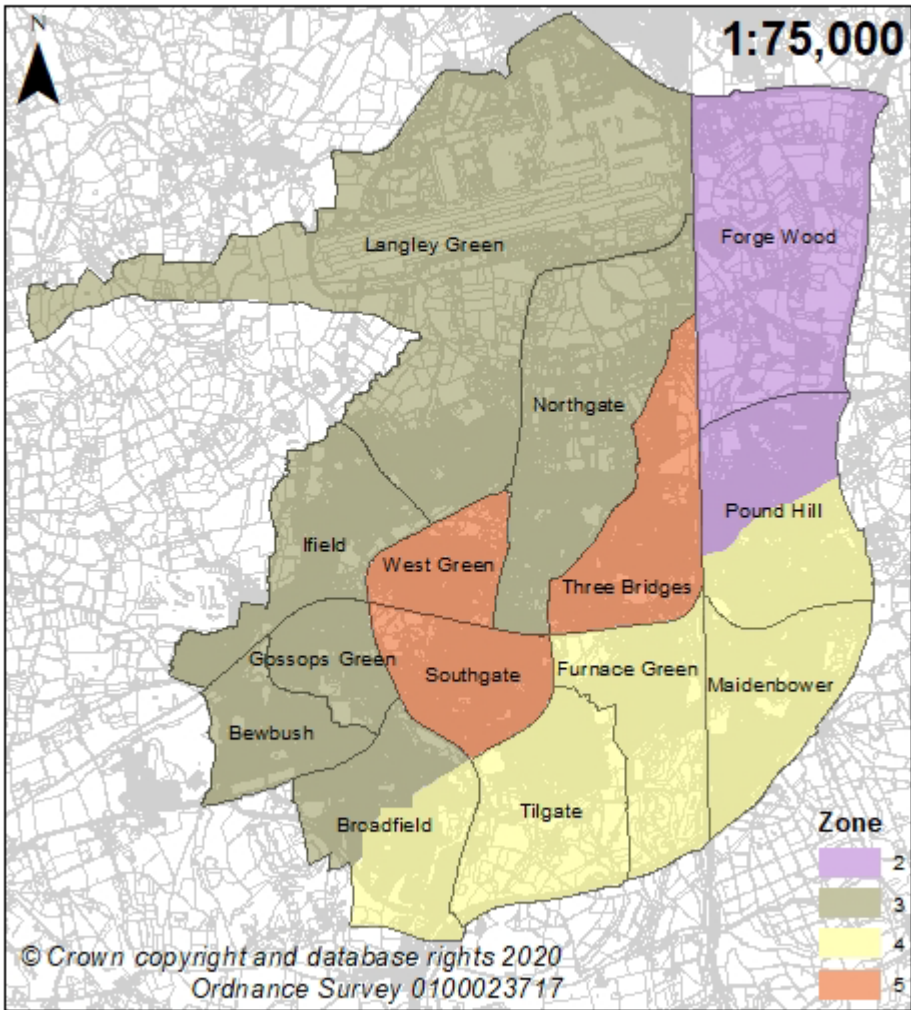
Two bed dwellings or more -

2 spaces per dwelling and 1 space per 8 dwellings for visitors

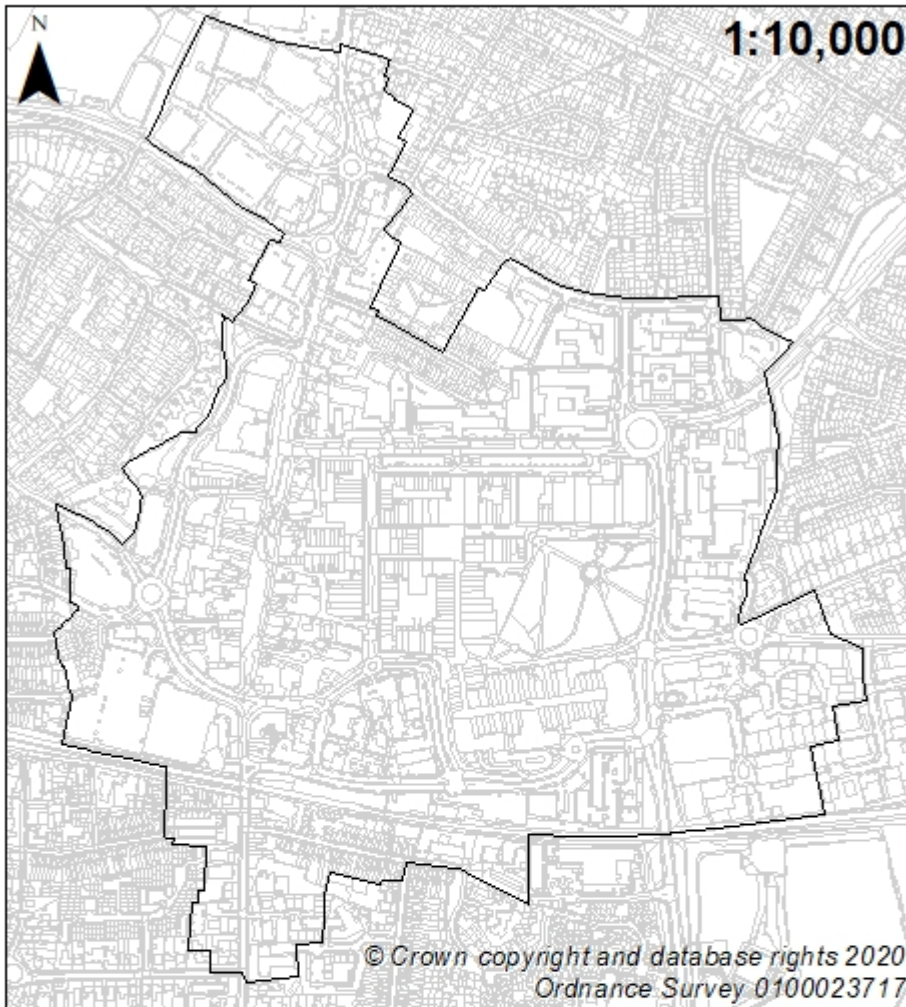
### **Motorcycle Parking**

1 space plus one space per 10 car parking spaces.

For retail uses involving bulky purchases the provision may be reduced to 1 space per 25 car parking spaces.

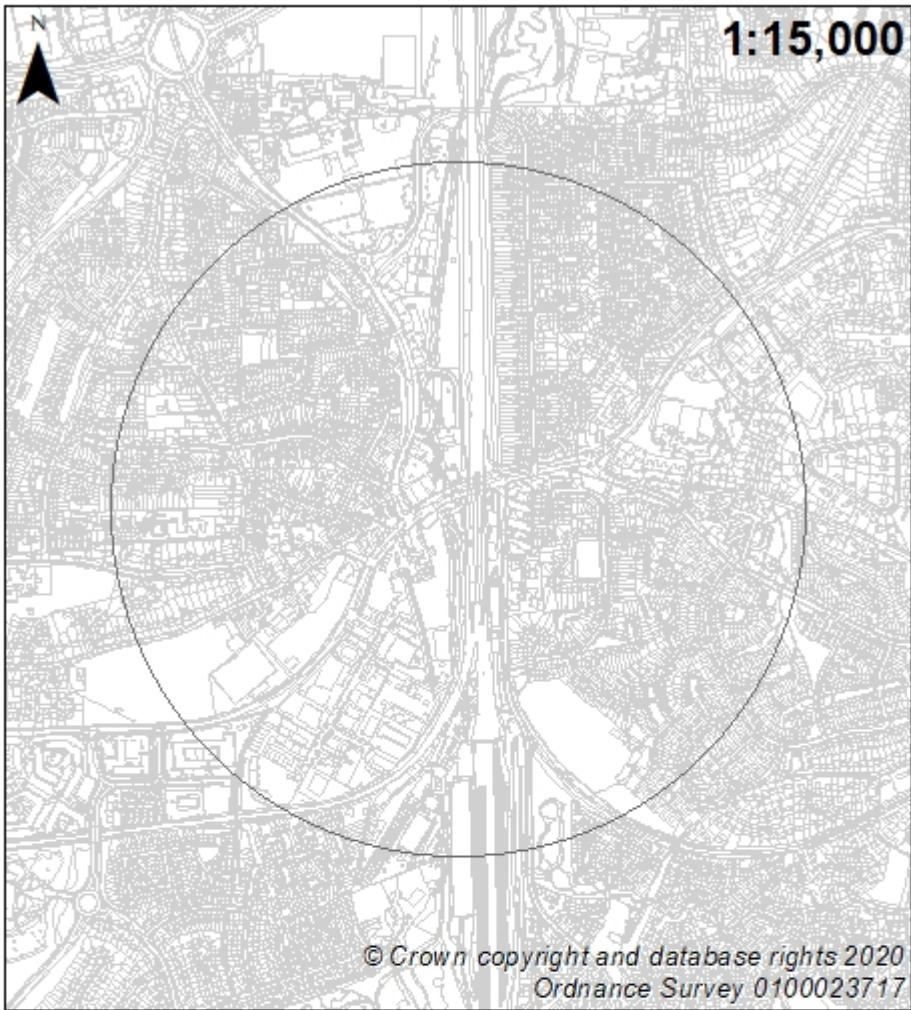


**Parking Behaviour Zones - C3 dwellings**



**B1(Office) Zone 1 - Town Centre**





**B1(Office) Zone 2 - Three Bridges**



**B1(Office) Zone 3 - Manor Royal**

# CRAWLEY LOCAL PLAN NOISE ANNEX

## 1.0 Introduction

- 1.1 Crawley is home to Britain's largest single-runway airport, a key sub-regional employment destination at Manor Royal Business District, and a major motorway (M23). Noise, therefore, represents an important planning consideration in the town.
- 1.2 The revocation of Planning Policy Guidance 24 (Planning and Noise) has resulted in an absence of detailed technical guidance at the national level to guide the relationship between development and noise. This Annex and the supporting Noise Topic Paper, therefore, draws upon evidence to provide policy context and establish locally specific guidance through which the approach of Local Plan Policy EP4: Development and Noise should be applied.
- 1.3 The council also recognises the inter-relationship between acoustics, ventilation, overheating and carbon minimisation. Good design needs to consider all these factors together and ensure that a solution to one single aspect is not to the detriment of the other three.

## 2.0 Planning Policy Context

### 2.1 National Policy Objectives

- 2.1.1 The National Planning Policy Framework (NPPF) sets out the Government's key planning objectives, recognising the need to reduce pollution as one of its 12 key principles. It requires the planning system to prevent new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of pollution (Paragraph 170). Paragraph 180 provides more detail, outlining that local plan policies and development management decisions should avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development. Where conflict does arise, impacts must be mitigated and reduced to a minimum.
- 2.1.2 The NPPF supersedes previous national level Government planning guidance. This included Planning Policy Guidance 24: Planning and Noise, which outlined measurable numeric noise categories through which the relationship between development and noise could be assessed.
- 2.1.3 With PPG24 having been revoked, the NPPF identifies the Explanatory Note of the Noise Policy Statement for England (DEFRA, 2010) as guidance for interpreting the level at which noise is considered to give rise to significant adverse impact. However, this does not identify measurable noise values to identify the 'Significant Observed Adverse Effect Level', the noise exposure level above which significant adverse effects on health and quality of life occur.
- 2.1.4 The government has since published *Planning Practice Guidance: Noise* (MHCLG, 2019). This outlines that local authorities should take account of the acoustic environment in plan making and decision taking, and in doing so should consider:
  - whether or not a significant adverse effect is occurring or likely to occur;
  - whether or not an adverse effect is occurring or likely to occur; and
  - whether or not a good standard of amenity can be achieved.
- 2.1.5 In line with the Explanatory Note of the Noise Policy Statement for England, this would include identifying whether the overall effect of noise exposure is, or would be, above or below the Significant Observed Adverse Effect Level (SOAEL), and the

Lowest Observed Adverse Effect Level for the given situation (LOAEL). The Planning Practice Guidance does not provide technical guidance to establish the levels at which SOAEL or LOAEL occur. It does, however, identify that local planning authorities may produce local plan specific noise standards to apply to various forms of proposed development and locations in their area.

- 2.1.6 Section 130 of the NPPF states '*Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents*' .
- 2.1.7 Section 127a of the NPPF states that '*Planning policies and decisions should ensure that developments... will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development*'.
- 2.1.8 ProPG: Planning & Noise – New Residential Development (May 2017) sets out principles of good acoustic design. It recognises the importance of designing out the adverse effects of noise at an early stage, using a holistic design process that creates places that are both comfortable and attractive to live in, where acoustics is considered integral to the living environment.

## 2.2 Local Policy

- 2.2.1 The key objective of Local Plan Policy EP4 is to guide the relationship between noise sensitive development and noise sources to ensure that a good quality of life is maintained for current and future residents.
- 2.2.2 This Local Plan Noise Annex identifies locally specific noise thresholds comprised of measurable value ranges through which noise impact from transport sources can be determined in order to support Policy EP4. These are based on the noise exposure hierarchy set out in *Planning Practice Guidance: Noise* and are discussed in detail in Section 4.1 of this Annex.
- 2.2.3 This Annex also provides guidance where proposals for noise sensitive development may be affected by industrial/commercial noise sources (Section 4.2), and on Noise Generating Development (Section 4.3).
- 2.2.4 Local Plan Policy EP4 also refers to the '*Planning Noise Advice Document: Sussex*' (2020 or latest revision), to assist in the preparation of Noise Impact Assessments. This document has been produced on a joint basis by East and West Sussex local planning authorities to provide clear and consistent guidance as to the level of information that should be submitted with planning applications for noise generating developments or noise sensitive developments, including guidance on when it is appropriate to submit a noise report and the required contents of such a report.

## 3.0 Understanding When Noise Could Become a Concern

- 3.1 *Planning Practice Guidance: Noise* identifies a noise exposure hierarchy which provides broad guidance on the levels at which noise exposure could become a concern. For consistency with national policy, this Noise Annex applies the noise hierarchy set out by the PPG, drawing upon technical evidence to assign measurable noise standards to each of its noise exposure categories.
- 3.2 At the lowest extreme, when noise is not noticeable, there is by definition no effect. As noise exposure increases, it crosses the **No Observed Effect Level**. This is the stage at which noise becomes noticeable, though it has no adverse effect as it does

not cause any change in behaviour or attitude. If the noise is at this level, no specific measures are required to manage the acoustic environment.

- 3.3 As noise exposure increases it crosses the **Lowest Observed Adverse Effect Level**, and may reach the **Observed Adverse Effect Level**. At this level noise can start to cause small changes in behaviour and attitude. For example, this could cause people to turn up the volume on the television or needing to speak more loudly to be heard. The noise level starts to have an adverse effect and steps need to be taken to mitigate and minimise those effects.
- 3.4 Continued increase in noise exposure will at some point cause the **Significant Observed Adverse Effect Level** to be crossed. Above this level, noise causes a material change in behaviour, for example necessitating that windows are kept closed most of time. If noise exposure is above this level, the planning process should be used to prevent this effect from occurring, by use of appropriate mitigation, for example through design and layout.
- 3.5 At the highest extreme, the **Unacceptable Adverse Level**, noise exposure would cause extensive and sustained changes in behaviour, without an ability to mitigate the effect of noise. At this level, the impacts on health and quality of life are such that regardless of the benefits of the activity causing the noise, noise exposure to sensitive uses should be prevented from occurring.
- 3.6 Although the word 'level' is used here, this does not mean that the effects can only be defined in terms of a single value of noise exposure. This annex states locally adopted evidence based levels for specific circumstances. However, this is not appropriate or possible in all circumstances. Compliance with World Health Organization levels or requiring sound to be at no more than background level is not a guarantee that the noise exposure would not result in a statutory nuisance, which can be said within planning terms to unreasonably affect amenity.
- 3.7 The NPSE and PPG recognises that level of effect can also be described in terms of behavioural responses such as having to have windows closed or the person having to make adaptations as a result of noise. These effects can often not be described by a single or combination of sound values. In such circumstances subjective criteria may be required whether supported or not by specific sound indices.

#### **4.0 Managing Noise in Crawley: Guidance to Support Local Plan Policy EP4**

##### **4.1 Noise sensitive development affected by noise from transport sources**

- 4.1.1 Local Plan Policy EP4 outlines that noise sensitive uses will only be permitted where users of the development will not be exposed to unacceptable noise disturbance from existing or proposed uses.
- 4.1.2 This section provides guidance to determine the threshold at which noise exposure from transport-based sources (air, road, rail, and mixed sources) is considered to become significant or unacceptable in a Crawley context.
- 4.1.3 Building on the noise exposure hierarchy identified in *Planning Practice Guidance: Noise*, and using the previous guidance in PPG24 and evidence identified in Section 6, the Annex identifies measurable local values through which to determine the acceptability of noise sensitive proposals where noise exposure from transport is a factor.

4.1.4 In particular, it identifies measurable threshold metrics for the Lowest Observed Adverse Effect Level (LOAEL), i.e. the level at which noise exposure can bring about changes in behaviour, and for the Significant Observed Adverse Effect Level (SOAEL), i.e. the noise level at which significant adverse effects on health and quality of life occur. It also outlines a measurable threshold to identify the Unacceptable Adverse Effect, this being the level at which noise exposure can cause extensive and regular changes in behaviour, attitude, and an inability to mitigate effect of noise, leading to psychological stress.

4.1.5 In determining the acceptability of noise sensitive proposals where noise exposure from a transport source is a factor, the standards set out in Table 1 (below) will be applied.

**NOISE ANNEX TABLE 1:  
Standards for exposure at the façade<sup>157</sup> for all habitable rooms<sup>158</sup> of noise sensitive development affected by noise from transport sources.**

	Examples of Outcomes	Daytime (07:00 – 23:00) Threshold	Night time (23:00 – 07:00) Threshold
No Observed Adverse Effect Level (NOAEL)	<b>Present and not intrusive:</b> Noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. Can slightly affect the acoustic character of the area, but not such that there is a change in the quality of life.	<51dB LAeq,16hr  <65dB LAFmax	<45dB LAeq,8hr  <60dB LAFmax
Lowest Observed Adverse Effect Level (LOAEL)		51dB LAeq,16hr  65dB LAFmax	45dB LAeq,8hr  60dB LAFmax
Observed Effect Level	<b>Present and intrusive:</b> Noise can be heard and causes small changes in behaviour, attitude or other physiological response, e.g. turning up volume of television; speaking more loudly; where there is no alternative ventilation, having to close windows some of the time because of the noise. Potential for some reported sleep disturbance. Affects the acoustic character of the area such that there is a small actual or perceived change in the quality of life.	Between 51db and 55dB LAeq,16hr (51 to 54dB LAeq,16hr for aviation transport sources)  > 65dB LAFmax	Between 45dB and 48dB LAeq,8hr for surface and aviation transport sources.  > 60dB LAFmax
Significant Observed Adverse Effect Level (SOAEL)	<b>Present and disruptive:</b> The noise causes a material change in behaviour, attitude or other physiological response, e.g. avoiding certain activities during periods of intrusion; where there is no alternative ventilation, having to keep windows closed most of the time because of the noise. Potential for sleep disturbance resulting in difficulty in getting to sleep, premature awakening, and difficulty getting back to sleep. Quality of life diminished due to change in acoustic character of the area.	For surface transport sources, between 55dB and 66dB LAeq,16hr. (54dB to 60dB LAeq,16hr for aviation transport sources)  65dB to 82dB LAFmax	Between 48dB and 57dB LAeq,8hr. for surface and aviation transport sources, 60dB to 82dB LAFmax

<sup>157</sup> This is the predicted free-field level at the proposed façade and not the final 'façade' level.

<sup>158</sup> Habitable rooms includes living/dining rooms, bedrooms, kitchen diners and studies.



	Examples of Outcomes	Daytime (07:00 – 23:00) Threshold	Night time (23:00 – 07:00) Threshold
Unacceptable Adverse Effect	<b>Present and very disruptive</b> Extensive and regular changes in behaviour, attitude or other physiological response and/or an inability to mitigate effect of noise leading to psychological stress, e.g. regular sleep deprivation/awakening, loss of appetite, significant medically definable harm, e.g. auditory and non-auditory.	For surface transport sources, greater than 66dB $L_{Aeq,16hr}$  For aviation transport sources, greater than 60dB $L_{Aeq,16hr}$	greater than 57dB $L_{Aeq,8hr}$ for surface and aviation transport sources.  > 82dB $L_{AFmax}$

- 4.1.6 All the above levels would include the predicted noise from any proposed or required changes in transportation noise including the potential additional southern wide spaced runway at Gatwick Airport, for which land is required to be safeguarded in the 2013 Aviation Policy Framework. Details of the predicted noise contours associated with a possible wide-spaced southern runway at Gatwick Airport are set out in Figure 1 of this Noise Annex, which shows the noise contours identified in Plan 31 of the Gatwick Airport Master Plan 2019 (Air Noise Map – Additional Runway – Summer Day - 2040). Planning applications for noise sensitive development will be considered on the basis of these noise contours. Figure 1 of the Noise Annex will be updated by the council should these contours be superseded by subsequent noise contours published by Gatwick Airport and approved by the CAA.
- 4.1.7 In interpreting the categories for the purposes of Local Plan Policy EP4, noise exposure is considered to be acceptable where the internal noise climate achieves standards set in BS8233 or replacement guidance. (N.B. the noise levels provided in BS8233 refer to steady noise sources only). It is also expected that to achieve an acceptable internal noise climate that individual noise events shall not exceed 45dB  $L_{AFmax}$  on a frequent basis. The acceptability of the frequency of events will depend on the level of exceedance of the 45dB  $L_{AFmax}$  criteria. Up to 10 events may be acceptable for small exceedances (<5dB), whilst for high exceedances (>10dB) less than 5 events will be acceptable.
- 4.1.8 For surface transport sources, the Lowest Observed Adverse Effect Level (LOAEL) is 51dB  $L_{Aeq,16hr}$  and 45dB  $L_{Aeq,8hr}$  at night. The Significant Observed Effect Level (SOAEL) is between 55dB and 66dB  $L_{Aeq,16hr}$  and between 45dB and 57dB  $L_{Aeq,8hr}$  at night. The Unacceptable Adverse Effect occurs where noise exposure is above 66dB  $L_{Aeq,16hr}$  (57dB  $L_{Aeq,8hr}$  at night).
- 4.1.9 For aviation transport sources, the Lowest Observed Adverse Effect Level (LOAEL) is 51dB  $L_{Aeq,16hr}$  and the Significant Observed Adverse Effect Level is between 54dB and 60dB  $L_{Aeq,16hr}$ . The Unacceptable Adverse Effect occurs where noise exposure is greater than 60dB  $L_{Aeq,16hr}$  (57dB  $L_{Aeq,8hr}$  at night). The lower standard for the day period is required as aviation noise affects the whole neighbourhood and not just a single façade as with surface transport. This is less of an issue at night so the level is the same as for surface transport.
- 4.1.10 For private amenity areas (private and communal gardens), the upper limit of noise exposure is considered to be 50dB  $L_{Aeq,16hr}$ , so that they can be enjoyed as intended. Where this is not possible to achieve despite implementing all reasonable mitigation measures, the standard can be relaxed by 5dB so that the sound level in private and communal gardens (including balconies) does not exceed 55dB  $L_{Aeq,16hr}$ . In very high noise areas where the less stringent standard of 55dB  $L_{Aeq,16hr}$  cannot reasonably be achieved, with careful design it should be achieved in some parts of the amenity space. In the case of balconies then the use of winter gardens must be considered.

- 4.1.11 Where noise exposure is likely to be of a material concern (LOAEL or SOAEL), a Noise Impact Assessment will be required in support of planning applications to demonstrate how noise impact will be made acceptable. For further information on the requirements of a Noise Impact Assessment, please see Section 5 of this Annex, ProPG and *Planning Noise Advice Document: Sussex* (2020 or latest version).
- 4.1.12 Any development where an acceptable internal noise climate cannot be achieved with windows opened must employ all reasonable mitigating steps with regards to window and façade design to allow the dwelling to be ventilated naturally. Where this is not possible alternative natural forms of ventilation must be provided by use of acoustic louvres or ventilators of adequate size to effectively deal with the effects of summer over-heating without the necessity to open the windows. The need for ventilation as a result of overheating (giving rise to discomfort and health effects) shall be minimised in the design, layout and features of the building having regard to the cooling hierarchy in Policy SDC1: Sustainable Design and Construction.
- 4.1.13 If it can be clearly demonstrated that this cannot be achieved, then as a last resort, in exceptional circumstances, alternative mechanical ventilation may be acceptable. Any mechanical forms of ventilation must achieve an internal Noise Rating Curve of 25 (NR25) or lower. Where Mechanical Ventilation and Heat Recovery (MVHR) is used it will be expected to have a 100% fully automated, modulated, summer bypass. Furthermore, when operating at maximum boost the in duct velocity shall be kept as low as reasonably practicable but in any event no greater than 3.5 metres per second and the motor capacity at no more than 70% of operating capacity unless it can be demonstrated that an alternative design criteria can deliver a suitable internal acoustic environment. The fan unit shall not be sited within bedrooms and any air inlets and outlets shall be acoustically treated to prevent noise ingress. The use of sealed windows will not be acceptable as they do not create a suitable living environment for the occupants.
- 4.1.14 Evidence of satisfactory implementation of the agreed mitigation will be required for developments in the SOAEL category. This would be the form of a post completion report to be submitted to and agreed by the LPA once the development has been completed and prior to occupation or sale.
- 4.2 *Noise sensitive development affected by industrial or commercial noise sources*
- 4.2.1 Local Plan Policy EP4 outlines that noise sensitive uses proposed in areas that are exposed to noise from existing or planned industrial or commercial sources, will only be permitted where future users will not be exposed to an unacceptable noise impact. For example, the creation of a statutory nuisance. This reflects the approach of NPPF Para 170(e).
- 4.2.2 This is based on the recognition that to introduce new noise sensitive receptors into locations where they may be affected by noise from established businesses can create conflict between those two uses and may prejudice the existing and future industrial or commercial operations.
- 4.2.3 NPPF paragraph 182 expands, recognising that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.

- 4.2.4 It is also recognised that some industrial or commercial uses may be planned, in the sense that they are subject to an extant planning permission, or have been identified for economic use through the Local Plan. For this reason, the policy approach also has regard to future planned developments.
- 4.2.5 To ensure that proposed noise sensitive uses do not conflict with existing or planned industrial/commercial uses, noise sensitive development will only be considered acceptable where future users would not be exposed to noise impact that would result in, for example, a statutory nuisance.
- 4.2.6 To ensure that proposals are acceptable in noise terms, an assessment should be made using BS4142:2014 + A1:2019 *Method for Rating and assessing industrial and commercial sound*, or any replacement guidance.
- 4.2.7 Where there is risk that noise sensitive proposals would be affected by noise that may, for example, create a statutory nuisance, a Noise Impact Assessment will be required in support of planning applications to demonstrate how that noise impact will be made acceptable. For further information on the requirements of a Noise Impact Assessment, please see Section 5 of this Annex, and *Planning Noise Advice Document: Sussex* (2020 or latest revision).
- 4.2.8 If it cannot be demonstrated that appropriate mitigation will be provided to manage significant or unacceptable noise impacts to an acceptable level, the proposal will be refused.
- 4.2.9 Where it is proposed to have a mixed-use development of residential and commercial units combined then there must be adequate sound insulation between the commercial and residential uses. In such circumstances a minimum DnTW of 65dB would be required.
- 4.3 *Noise generating development*
- 4.3.1 Local Plan Policy EP4 outlines that noise generating development will be permitted where it can be demonstrated that any nearby noise sensitive uses (as existing or planned), will not be exposed to noise impact that will adversely affect the amenity of users of surrounding noise sensitive premises.
- 4.3.2 To ensure that proposals are acceptable in noise terms, development should comply with BS4142:2014 + A1:2019 *Method for Rating and assessing industrial and commercial sound*, or any replacement guidance.
- 4.3.3 When assessing the noise impact using BS 4142 the Noise Rating level must be equivalent to the background ( $L_{A90}$ ) level. BS4142 advises that there are locations where existing noise levels are high and might result in adverse impacts themselves. Therefore when existing noise levels exceed 50dB  $L_{Aeq,1hr}$  during the day or 40dB  $L_{Aeq,15mins}$  during the night the Noise Rating Level must be at least 3dB below the background ( $L_{A90}$ ) level.
- 4.3.4 The daytime figure relates to the upper limit for external amenity areas and the night time figure relates to the maximum external noise level required to achieve the 30dB  $L_{Aeq,8hr}$  level specified in BS8233 for undisturbed sleep with windows wide open.
- 4.3.5 Where there is risk that development would adversely affect the amenity of users in surrounding noise sensitive premises, a Noise Impact Assessment will be required in support of planning applications, to demonstrate how noise impact will be made

acceptable. For further information on the requirements of a Noise Impact Assessment, please see Section 5 of this Annex, and *Planning Noise Advice Document: Sussex* (2020 or latest revision).

- 4.3.5 If it cannot be demonstrated that appropriate mitigation will be provided to manage noise impact to an acceptable level, the proposal will be refused.

## **5.0 Noise Impact Assessment**

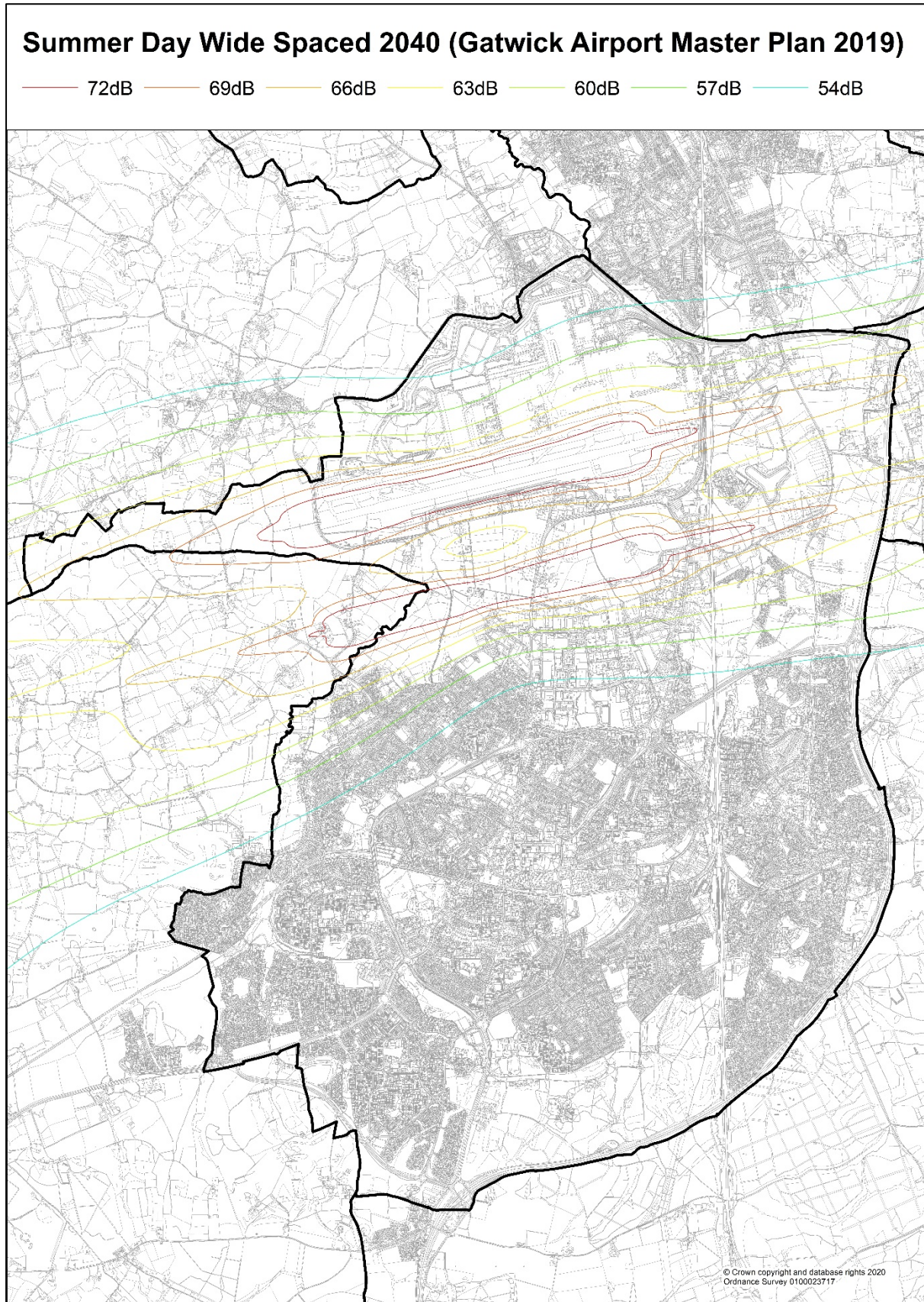
- 5.1 As identified in Part C of Local Plan Policy EP4, a Noise Impact Assessment will be required to support applications where noise sensitive uses are likely to be exposed to significant or unacceptable noise exposure.
- 5.2 The Noise Impact Assessment will be required to assess the impact of the proposal as a noise generator or receptor, as appropriate.
- 5.3 It will also be required to demonstrate in full how the development will be designed, located, and controlled to mitigate (as appropriate) the impact of noise on health and quality of life, neighbouring properties, and the surrounding area.
- 5.4 In some circumstances, reliance on a third party structure may not be acceptable as a part of a noise control proposal.
- 5.5 In all cases, the best practical means (or ‘all reasonable steps’) of mitigation will be required to mitigate noise impact to an appropriate level, and in liaison with Crawley Borough Council Environmental Health. In some circumstances this may include the use of alternative sites to the one proposed.
- 5.6 If it cannot be demonstrated that appropriate mitigation will be provided to manage significant or unacceptable noise impacts to an acceptable level, the proposal will be refused.
- 5.7 In preparing a Noise Impact Assessment, applicants should adhere to *Planning Noise Advice Document: Sussex* (2020 or latest revision), which supports Local Plan Policy EP4 and this accompanying Annex.

## **6.0 Further Reference**

- 6.1 Where development proposals are likely to be affected by noise, either as a source or receptor, applicants are strongly encouraged to liaise with Crawley Borough Council Environmental Health prior to submitting an application.
- 6.2 To contact Environmental Health please email [environmentalservices@ Crawley.gov.uk](mailto:environmentalservices@ Crawley.gov.uk).



**NOISE ANNEX FIGURE 1: SUMMER DAY (07:00 – 23:00) WIDE-SPACED 2040 NOISE CONTOURS (L<sub>Aeq, 16hr</sub>) TAKEN FROM PLAN 31 OF THE GATWICK AIRPORT MASTER PLAN 2019**



# Housing Trajectory - Base Date 1 Sept 2020

## Summary Trajectory

Local Plan Year			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	Total
Year	2019/ 20	2020/ 21	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	2035/ 36	2036/ 37	2021- 37
Gross (incl. permitted small sites 2020-24)	456	740	145	357	365	205	493	819	584	419	310	97	30	21	0	0	0	0	3846
Losses	4	0	0	0	0	0	1	7	11	0	0	0	0	6	0	0	0	0	25
Net	452	740	145	357	365	205	492	812	573	419	310	97	30	15	0	0	0	0	3820
Windfalls (excl. permitted small sites 2020-24)	0	0	75	80	88	90	90	90	90	90	90	90	90	90	90	90	90	90	1413
Communal Accommodation	-48	0	0	0	0	0	0	50	33	0	0	0	0	0	0	0	0	0	83
Projected net delivery	404	740	220	437	453	295	582	952	696	509	400	187	120	105	90	90	90	90	5316

**Local Plan Housing Requirement 2021-37** **5320**  
**Stepped Requirement for Years 1 to 5 of Local Plan Period** **350 + 350 + 350 + 350 + 350 = 1750**  
**Stepped Requirement with 10% buffer added** **1925**  
**Projected net completions in Years 1 to 5** **1987**  
**Years' supply projected for Years 1 to 5** **5.2**









EMPLOYMENT LAND TRAJECTORY JANUARY 2021 (BASE DATE 1 SEPTEMBER 2020)

Site Reference	Site/Location	Commentary	Planning Reference	Suitable	Available	Achievable	Site Area (Ha)	Business Floor space (Sq.m)	Office B1a/B1b floor space (Sq.m)	Industrial B1c/B2/B8 floor space (Sq.m)	Other Employment Floorspace (Sq.m)	Office Land B1a/B1b (Ha)	Industrial Land B1c/B2/B8 floor space (Ha)
<b>Sites Deliverable Years 1-5</b>													
A	Nexus, Gatwick Road (Parcel 3)	Outline permission CR/2014/0764/OUT for Parcel 3 (3 x A1 and A3/A5 buildings totalling 1,025 sq.m) has lapsed. Agent advises that site has potential for B1/B2/B8 plus other support facilities for the main employment area.	CR/2014/0764/OUT	Yes	Yes	Yes	0.64	0	0	0	0	0.32	0.32
B	Wingspan Club Residual Land	Landowner, CBC Property, assessing options for development of site as either a single 2,787sqm B8 building or a number of smaller units. Anticipate delivery by 2023.	N/A	Yes	Yes	Yes	0.64	2,787	0	2,787	0	0	0.64
C(i)	Rackspace, Former GSK site (south east land parcel)	Permission is for 2 x B8 data storage buildings (Rackspace) to provide 25,317sqm in total (12,658.5sqm each). Building 1 completed 2015/16. Work on Building 2 not yet started. Remaining site area is therefore 3.295ha, half that of total scheme (6.59ha).	Permitted CR/2013/0255/FUL	Yes	Yes	Yes	3.295	12,659	0	12,659	0	0	3.295
C(ii)	Former GSK Site (north and west land parcel)	Permission CR/2014/0415/ARM relates to the north and west land parcel. It permits development of 2 data storage halls (Buildings 1 and 2), an emergency power building (Building 3), and a business hub building comprising café at ground floor with offices above (Building 4) together with associated car parking, servicing arrangements and landscaping. Building 1 provides 13,431sqm B8 on a 2.106 ha plot. It is occupied by Digital Realty, and having been completed 2017/18, it is no longer included in the remaining site and floorspace figures. Building 2 provides approx 1,521sqm B1a and 19,391sqm B8 on a 2.59ha plot. Work is yet to commence on this building. Building 3 provides 2,696sqm plant on a 0.2ha plot. Building 4 provides 1,433sqm B1a office and 87sqm A3 cafe on a 0.4ha plot.	CR/2014/0415/ARM	Yes	Yes	Yes	3.19	22,345	2,954	19,391	2,783	0.565	2.4
D(i)	Gatwick Park (Site G1), Gatwick Road	Permission for demolition of 3 existing office buildings and erection of a new B1(a) office building. Being marketed as Gatwick Park.	CR/2016/0997/FUL	Yes	Yes	Yes	0.8	10,960	10,960	0	0	0.8	0.0
D(ii)	Gatwick Park (Site G2), BCL House, Gatwick Road	Permission for redevelopment of the site with a 5-storey (step down) office building. Being marketed as Gatwick Park.	CR/2017/1057/FUL	Yes	Yes	Yes	0.44	6,637	6,637	0	0	0.44	0.0
E	Elekta, London Road and Fleming Way (Phase 2)	Phase 1, Building A (11,828 sqm B1a floorpace) is complete. Phase 2, for the erection of a second building to provide 4,345 sqm B1a floorspace is not built out.	CR/2014/0760/FUL	Yes	Yes	Yes	0.4	4,345	4,345	0	0	0.4	0.0
F	Land at Jersey Farm (Site A)	Planning Permission CR/2019/0696/FUL for a B8 warehouse, associated landscaping and car parking.	CR/2019/0696/FUL	Yes	Yes	Yes	0.69	2,095	0	2,095	0	0.00	0.69
G	Units XA1 and XA2, Sussex Manor Business Park	Planning Permission for extension to the existing 9,500sqm building to provide an additional 1,688sqm B2 floorspace.	CR/2019/0456/FUL	Yes	Yes	Yes	1.7	1,688	0	1,688	0	0.00	0.00
H	Forge Wood Employment Land	Employment provision for Forge Wood neighbourhood, identified for delivery of 5,000 sqm flexible B1/B2/B8 business land.	CR/2016/0858/ARM	Yes	Yes	Yes	2.74	5,000	2,500	2,500	2,500	1.37	1.37
I	Tilgate Forest Business Park, Vacant Plot	Site is located in the Tilgate Forest Business Park Main Employment Area. Discharge of condition relating to permission CR/2013/0423/FUL for 2 x three storey office blocks extension of time. Office development is subject to a technical commencement and is therefore extant.	CR/2017/0346/FUL	Yes	Yes	Yes	0.9	4,630	4,630	0	0	0.9	0
J	Southways, London Road	Site is situated within land that is subject to Gatwick Airport Safeguarding. However, Certificate of Lawfulness CR/2013/0008/192 confirms that development for twin office buildings is commenced and extant.	CR/2013/0008/192 CR/2013/0094/FUL	Yes	Yes	Yes	2.83	3,241	3,241	0	0	2.83	0
K	County Buildings, Northgate Avenue	Site included in WSCC Asset Management Strategy and is identified as a priority for mixed-use residential and commercial (office) development. Assumption is for 75% of the site to be dedicated to housing, with 25% (plot ratio 2.0) dedicated to office use. Completion is anticipated no later than 2025.	N/A	Yes	Yes	Yes	1.04	5,200	5,200	0	0	0.26	0
L	Land North of The Boulevard	Permission CR/2017/0997/OUT for a.) demolition of existing council offices and erection of replacement town hall, offices, and public square, and b.) outline application for residential development comprising 182 units including commercial space. Provides a net gain of 4,173 sqm office space (14,695 sqm total). Office/civic sector of the site is 0.56ha, and this figure is counted towards the employment land supply.	CR/2017/0997/OUT	Yes	Yes	Yes	1.23	14,695	14,695	0	370	0.56	0
M	Moka, Station Way	Residential-led mixed-use development. Will deliver 650sqm ground floor commercial floorspace, this being flexible within use classes A1/A3/A4/B1/D1 and split between 2 to 4 units.	CR/2019/0542/FUL	Yes	Yes	Yes	0.36	650	650	0	650	0.36	0
N	Land at Station Hill, Pound Hill	Planning permission CR/2019/0588/FUL for erection of three storey office building with car park	CR/2019/0588/FUL	Yes	Yes	Yes	0.0379	414	414	0	0	0.0379	0
							<b>20.93</b>	<b>97,346</b>	<b>56,226</b>	<b>41,120</b>	<b>6,303</b>	<b>8.84</b>	<b>8.72</b>

Site Reference	Site/Location	Commentary	Planning Reference	Suitable	Available	Achievable	Site Area (Ha)	Business Floor space (Sq.m)	Office B1a/B1b floor space (Sq.m)	Industrial B1c/B2/B8 floor space (Sq.m)	Other Employment Floorspace (Sq.m)	Office Land B1a/B1b (Ha)	Industrial Land B1c/B2/B8 floor space (Ha)
<b>Allocation for a Strategic Employment Location (Deliverable Years 6-15)</b>													
O	Land East of Balcombe Road and South of M23 Spur (Gatwick Green)	The Local Plan allocates land at East of Balcombe Road and south of the M23 spur, referred to as Gatwick Green, for development of an industrial-led Strategic Employment Location of 24.1ha predominantly B8 storage and distribution warehouse (Class B8) uses, potentially supported by light industrial and general industrial and a limited amount of complementary ancillary uses that support the principal storage and distribution function. The allocation will meet Crawley's outstanding business land supply requirement, which equates to 77,800sqm B8 floorspace. Development would come forward Years 6-15 of the Plan, with a seven to ten year build out anticipated for completion 2035. The site would therefore meet employment needs in the later part of the Plan period. 47ha of land are included in the allocation boundary but any industrial floorspace or ancillary uses beyond the 24.1ha allocation would have to be justified by appropriate evidence. The identified site is larger because of the potential, where justified by evidence, for supporting uses catering for the needs of employees, and because of the need for the strategic development to provide comprehensive supporting infrastructure, appropriate landscaping and to protect the amenity of neighbouring properties.	Allocated in Reg. 19 Local Plan	Yes	Yes	Yes	24.1	77,800	0	77,800	0	0	24.1
							<b>24.10</b>	<b>77,800</b>	<b>0</b>	<b>77,800</b>	<b>0</b>	<b>0</b>	<b>24.1</b>

	Office B1a/b Floorspace (Sq.m)	Industrial B1c/B2/B8 Floorspace (Sq.m)	Total B-Class Floorspace (Sq.m)	Office B1a/b Land (Ha)	Industrial B1c/B2/B8 Land (Ha)	Total B-Class Land (Ha)
Years 1-5	56,226	41,120	97,346	8.84	8.72	17.56
Gatwick Green SEL (Years 6-15)	0	77,800	77,800	0.00	24.10	24.10
<b>Local Plan Total</b>	<b>56,226</b>	<b>118,920</b>	<b>175,146</b>	<b>8.84</b>	<b>32.82</b>	<b>41.66</b>