

Consultation Statement

July 2023



Appendix 8:
Further Publication Consultation
Representations

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APPENDIX 8: FURTHER PUBLICATION CONSULTATION REPRESENTATIONS

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Crawley Borough Local Plan, Vision & Sustainable Development

Regulation 19 Consultation May-June 2023 Representations

General Comments, Vision, Local Plan Chapters 1 – 3, Viability Assessment & Planning Obligations
Annex

Local Plan General			
Ref. No.	Respondent	Policy/ Para	Comments
REP/011 (2023)	National Highways	Soundness	<p>Thank you for your formal notification email of 10 May 2023 inviting National Highways (NH) to comment on the Crawley Borough Local Plan 2024-2040: Regulation 19 Consultation, as part of the consultation process, seeking a response no later than 17.00 on 20th June 2023.</p> <p>We have read the Local Plan Representation Guidance. We understand that we do not need to repeat comments made on a previous Regulation 19 consultation.</p> <p>We appreciate that the focus of this consultation is on legal compliance and the soundness of the Local Plan as judged against the soundness tests in the National Planning Policy Framework (NPPF) (July 2021) para.35. We have structured our response accordingly.</p> <p>Policy Context NH is responsible for the Strategic Road Network (SRN), with our focus being on its safety, reliability and operational efficiency. Unacceptable impacts on the SRN must be avoided. Furthermore, in accordance with national policy, NH expects the plan-making process to explore all options to reduce a reliance on the SRN for local journeys including a reduction in the need to travel and integrating land use considerations with the need to maximise opportunities for walking, wheeling, cycling, public transport and shared travel.</p> <p>The policy of the Secretary of State for Transport in relation to the SRN is Circular 1/2022: Strategic road network and the delivery of sustainable development. In responding to this consultation, NH has taken Circular 1/2022 (“1/22”) as relevant national policy alongside the NPPF.</p> <p>The remainder of this response is split into three tables:</p> <ol style="list-style-type: none"> Table 1: Legal Compliance – This is focused on how Crawley Borough Council has engaged with NH during the plan-making process on strategic transport matters relating to the SRN. Table 2: Soundness Tests – This is focused on the soundness tests and how plan-making has considered and responded to transport-related matters that are likely to impact on the SRN, as well as compliance with national policy on transport matters, in particular national policy on the SRN (Circular 1/2022). Table 3: Detailed Representations – These are focused on detailed comments on individual policies relating to strategic transport matters that are likely to impact on the SRN. In some cases, they highlight how the robustness of the policies could be improved through some minor modifications. <p>We would like to thank Crawley Borough Council for their positive engagement with NH during the preparation of the Local Plan. We have valued the opportunities to review and comment on earlier stages and pieces of transport evidence.</p> <p>We recognise that Circular 1/2022 was published by the Department for Transport at a relatively late stage in the plan-making process (December 2022). However, it is important to appreciate that this does represent</p>

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Ref. No.	Respondent	Policy/ Para	Comments						
			<p>national policy in respect of the SRN. The Local Plan, in many respects, does address key principles of sustainable development in the Circular and we are happy to work with you to ensure the Plan positively responds to the government's expectations.</p> <p>A summary of NH's key points concludes the response.</p> <p>Soundness This section of the response initially highlights significant soundness issues that NH would wish to work with the Council on to resolve, ide prior to submission. This is followed by a table of additional comments highlighting minor modifications that would strengthen the robustn of certain policies.</p> <p>Table 2: Soundness: Significant Issues</p> <table border="1"> <thead> <tr> <th>NH Rep. No.</th> <th>Soundness Test</th> <th>NH response</th> </tr> </thead> <tbody> <tr> <td>NH002</td> <td>Positively prepared: unmet housing need and consequences for SRN</td> <td> <p>It is understood that the spatial strategy in the Local Plan would adde 42% of the assessed housing need. This means that the level of unmet need which the Local Plan is not responding to is 58%, which equat to 7,050 residential units.</p> <p>NH welcome the continual positive engagement with neighbouri authorities about addressing the identified unmet need through th plan-making processes. However, this is clearly at a very early sta and there is little evidence of tangible progress on this matter.</p> <p>This concerns NH because the level of unmet need is significant a without provisions being made for addressing this across the wid housing market area, it is not possible to assess if potential optio (allocations in neighbouring emerging Local Plans) could lead unacceptable impacts on the safety, reliability and operational efficien of the SRN (M23 and A23).</p> <p>In the absence of a clear worked-up strategy, and given the significan of the unmet need, NH does not believe the Local Plan has effective satisfied, to date, the positively prepared soundness test.</p> </td> </tr> </tbody> </table>	NH Rep. No.	Soundness Test	NH response	NH002	Positively prepared: unmet housing need and consequences for SRN	<p>It is understood that the spatial strategy in the Local Plan would adde 42% of the assessed housing need. This means that the level of unmet need which the Local Plan is not responding to is 58%, which equat to 7,050 residential units.</p> <p>NH welcome the continual positive engagement with neighbouri authorities about addressing the identified unmet need through th plan-making processes. However, this is clearly at a very early sta and there is little evidence of tangible progress on this matter.</p> <p>This concerns NH because the level of unmet need is significant a without provisions being made for addressing this across the wid housing market area, it is not possible to assess if potential optio (allocations in neighbouring emerging Local Plans) could lead unacceptable impacts on the safety, reliability and operational efficien of the SRN (M23 and A23).</p> <p>In the absence of a clear worked-up strategy, and given the significan of the unmet need, NH does not believe the Local Plan has effective satisfied, to date, the positively prepared soundness test.</p>
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			NH003	Justified: Transport evidence and consequences for the SRN	<p>NH recognise and appreciate the ongoing engagement on the preparation of the Crawley Transport Study (CTS).</p> <p>NH have noted that there is a misalignment between the forecast year in the CTS (2035) and the time horizon for the Local Plan (2040). This is a difference of five years.</p> <p>This may/may not be significant, but it would be unreasonable to assume, in the absence of updated evidence, that there would not be significant implications for/unacceptable impacts on the safety, reliability and operational efficiency of the SRN (M23 and A23).</p> <p>According to the housing trajectory, 500 new homes are projected to be delivered during the last five years of the plan period. The source of this supply is windfalls. Given that this at the end of the plan period, this may be a conservative estimative of delivery because prior to this point at least one Local Plan review would have been completed and additional sites are likely to be allocated for this period. Furthermore, there may be significant windfall sites coming forward during these last five years which are not possible to rule out at this stage.</p> <p>Given this misalignment, NH does not believe that the Local Plan has effectively satisfied the justified test because the key piece of transport evidence is not sufficiently proportionate.</p> <p>NH wishes to work with the Council on what needs to be done to update the transport assessment so that it aligns with the time horizon of the Local Plan. We understand that further work is being considered in relation to the transport impacts of the Local Plan, which is welcomed.</p>

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REP/056 (2023)	Gatwick Airport Limited		<p>Dear Sir / Madam, TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) (AMENDMENT) REGULATIONS 2012 DRAFT CRAWLEY BOROUGH LOCAL PLAN 2024 – 2040 (MAY 2023) – SUBMISSION PUBLICATION CONSULTATION (REGULATION 19) Gatwick Airport Limited (GAL) welcomes this opportunity to comment on the Submission Draft Crawley Local Plan (May 2023).</p> <p>We responded to the previous Regulation 19 Submission Draft Crawley Local Plan consultations in March 2020 and June 2021, and we understand that these previous representations will be submitted in full to the Secretary of State as part of the Examination. We are consequently not seeking to repeat those previous representations but to make additional comments based on the policies as they appear in the latest draft Local Plan. For convenience, Table 1 summarises our position in respect of representations at each Regulation 19 consultation.</p> <p>In November 2022, we made representations to Systra, Crawley Borough Council's appointed engineer, in respect of the design of the Crawley Western Link Road. We do not consider these objections have been addressed in the latest iteration of Policy ST4, in particular, the Area of Search for the Link Road as now shown on the Policies Map. We have consequently expanded our objection to this policy and enclose a copy of our representations to Systra at Appendix 1 to this letter.</p> <p>This latest consultation does not raise any other new issues. However, some of our previous objections have not been addressed. We remain very concerned about the approach of the plan with regards to Safeguarded Land at Gatwick Airport. In particular, we continue to object strongly to the new proposal to allocate 47 hectares of land at 'Gatwick Green' as a strategic employment site (Draft Policies EC1 and EC4). The site is located to the east of Gatwick Airport within the boundary of the safeguarded area. For reasons set out in these and previous representations, we contend that the Council is wrong to have concluded that this allocation can be made without prejudicing the delivery of a second runway at Gatwick Airport. There are also other deficiencies with this allocation, which further support our contention that this allocation should be removed from the plan. These include:</p> <ul style="list-style-type: none"> • the site allocation is for c.47ha but the evidence base only identifies a need for 13.73ha; • we have serious doubts about the need assessment for this employment allocation taking into account the varying forecasts of employment land requirements from the various employment studies underpinning the plan, together with the uncertainty arising from current economic conditions and the implications of water neutrality on housing and employment growth at the start of the plan period, and;

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			<ul style="list-style-type: none"> • there are serious shortcomings related to the acceptability of road access to what would potentially become a major logistics facility; • there is uncertainty about whether appropriate public transport access can be delivered; and • there is uncertainty about whether the Council has cooperated adequately with authorities on considering the functional economic market area as part of its economic evidence gathering. <p>Table 1: Summary of GAL's representations to the May 2023 Regulation 19 consultation on the draft Crawley Local Plan (DCLP) and comparison with those made to the 2020 and 2021 Regulation 19 versions of the DCLPs</p> <table border="1"> <thead> <tr> <th>Policy in May 2023 Regulation 19 DCLP</th> <th>Policy in Jan 2021 Regulation 19 DCLP</th> <th>Policy in Jan 2020 Regulation 19 DCLP</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>GAT1: Development of the Airport with a Single Runway</td> <td>GAT1: Development of the Airport with a Single Runway</td> <td>GAT1: Development of the Airport</td> <td>We broadly supported this policy in the 2020 and 2021 Regulation 19 DCLPs but objected to aspects of the wording of the policy and supporting text. We maintain our objections to aspects of the policy and supporting text where they have not been overtaken by subsequent amendments. The latest policy iteration introduces three changes comprising a rebalancing of the assessment approach through the inclusion of the word 'adverse'; the introduction of an additional impact test and the introduction of a requirement for compensation in addition to any mitigation measures. We object to all these changes.</td> </tr> <tr> <td>GAT2: Safeguarded Land</td> <td>GAT2: Safeguarded Land</td> <td>-</td> <td>We support the reinstatement of this policy from the Crawley 2015 Local Plan (and the revised wording) but consider definition of the phrase 'small scale' is required.</td> </tr> <tr> <td>GAT3: Gatwick Airport Related Parking</td> <td>GAT3: Gatwick Airport Related Parking</td> <td>GAT2: Gatwick Airport Related Parking</td> <td>We supported this policy in 2020 and 2021. We maintain our support for this policy</td> </tr> <tr> <td>GAT4: Employment Uses at Gatwick</td> <td>GAT4: Employment Uses at Gatwick</td> <td>GAT3: Employment Uses at Gatwick</td> <td>We supported this policy in 2020 and 2021. We maintain our support for this policy</td> </tr> <tr> <td>-</td> <td>-</td> <td>SD3: North Crawley Area Action Plan</td> <td>We support the removal of this policy that was initially introduced in the 2020 Regulation 19 DCLP.</td> </tr> </tbody> </table>	Policy in May 2023 Regulation 19 DCLP	Policy in Jan 2021 Regulation 19 DCLP	Policy in Jan 2020 Regulation 19 DCLP	Status	GAT1: Development of the Airport with a Single Runway	GAT1: Development of the Airport with a Single Runway	GAT1: Development of the Airport	We broadly supported this policy in the 2020 and 2021 Regulation 19 DCLPs but objected to aspects of the wording of the policy and supporting text. We maintain our objections to aspects of the policy and supporting text where they have not been overtaken by subsequent amendments. The latest policy iteration introduces three changes comprising a rebalancing of the assessment approach through the inclusion of the word 'adverse'; the introduction of an additional impact test and the introduction of a requirement for compensation in addition to any mitigation measures. We object to all these changes.	GAT2: Safeguarded Land	GAT2: Safeguarded Land	-	We support the reinstatement of this policy from the Crawley 2015 Local Plan (and the revised wording) but consider definition of the phrase 'small scale' is required.	GAT3: Gatwick Airport Related Parking	GAT3: Gatwick Airport Related Parking	GAT2: Gatwick Airport Related Parking	We supported this policy in 2020 and 2021. We maintain our support for this policy	GAT4: Employment Uses at Gatwick	GAT4: Employment Uses at Gatwick	GAT3: Employment Uses at Gatwick	We supported this policy in 2020 and 2021. We maintain our support for this policy	-	-	SD3: North Crawley Area Action Plan	We support the removal of this policy that was initially introduced in the 2020 Regulation 19 DCLP.
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			EC1: Sustainable Economic Growth	EC1: Sustainable Economic Growth	EC1: Sustainable Economic Growth	We objected to this policy in the 2020 Regulation 19 DCLP. We wish to maintain objections to this policy insofar as it fails to acknowledge the economic benefits arising from Gatwick Airport and as it provides for the allocation of an industrial-led Strategic Employment Location at Gatwick Green, on land east of Balcombe Road and south of the M23 spur.
			EC2: Economic Growth in Main Employment Areas	EC2: Economic Growth in Main Employment Areas	EC2: Economic Growth in Main Employment Areas	We objected to this policy in the 2020 Regulation 19 DCLP but note that the policy has now been changed. However, it still allows for major employment development in Lowfield Heath despite its location in the safeguarded land at Gatwick Airport. We consider this approach also conflicts with the scale of development envisaged under Policy GAT2. We maintain our objection to this aspect of the policy.
			EC4: Strategic Employment Location (Gatwick Green)	EC4: Strategic Employment Location (Gatwick Green)	-	We continue to object most strongly to the introduction of this new allocation for an industrial-led Strategic Employment Location at Gatwick Green which is located in land that is safeguarded at Gatwick Airport for an additional runway and which will have a significant impact on the ability to implement the Gatwick Airport Masterplan 2019.
			EC7: Visitor Accommodation	EC7: Visitor Accommodation	EC6: Visitor Accommodation	We objected to the policy in the 2020 Regulation 19 DCLP but note that the policy was amended in the 2021 document. We continue to support the revised policy.

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REP/062	Environment Agency		<p>Thank you for your consultation which we received on 10 May 2023. Having reviewed The Regulation 19 consultation, we find it "SOUND" subject to some minor changes for clarification purposes</p> <p>Suggested Modifications:</p>
REP/168	Network Rail	<p>Local Plan Housing – Unmet Needs</p> <p>Infrastructure Requirements</p> <p>Planning Obligations</p>	<p>NETWORK RAIL RESPONSE TO CRAWLEY BOROUGH COUNCIL LOCAL PLAN (REGULATION 19) CONSULTATION</p> <p>Thank you for providing Network Rail the opportunity to make comment on the Regulation 19 version of the Local Plan. Network Rail have previously submitted comments around Gatwick Airport and the work that has been undertaken, the below are additional covering other issues and the latest evidence base documents.</p> <p>Network Rail is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland, and Wales. As statutory undertaker, Network Rail is under license from the Department for Transport (DfT) and Transport Scotland (TS) and regulated by the Office of Rail and Road (ORR) to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway. As a matter of course, proponents of sites which are close to the railway boundary or sites which could affect the railway asset directly are required to engage with our Asset Protection and Optimisation team (ASPRO). Similarly, there are a range of level crossings (both vehicle and pedestrian) that will experience increased usage from the proposed developments proposed within the draft Local Plan. As part of Network Rail's license to operate and manage Britain's railway infrastructure, Network Rail have the legal duty to protect rail passengers, the public, the railway workforce, and to reduce risk at our level crossings so far as is reasonably practicable. A case-by-case risk assessment is required for the affected level crossings as and when planning applications are made and full details of the development has been provided. The assessments may identify that improvements / closure of level crossing is required to mitigate the imported risk. As a public funded company, Network Rail has responsibilities to spend public funds efficiently which consequently means we do not have the funds available to mitigate the impact of third party development on level crossings. Consequently, Network Rail expect any mitigation required to be funded at no expense to Network Rail.</p> <p>Suggested Modifications:</p>
REP/062	Environment Agency	Water Quality 1.31	<p>Water Quality</p> <p>The plan covers most aspects of surface water quality to some extent but could be improved. Climate change impacts have been included in the Local Plan, but the impacts of climate change on surface water quality were not adequately addressed. The local plan should give more detail on measures to protect and enhance the status water bodies under the Water Environment (Water Framework Directive) (England and Wales) Regulations. This should be done in relation to the various elements making up the overall water body status.</p>

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			<p>Specific comments</p> <p>Page 14, 1.31, on “Partnership working to resolve the water supply constraint to development affecting the local authority areas within the Sussex North Water Resource Zone. Joint commissioning of technical evidence to secure water neutrality and ensure new development does not add to the impacts of water abstraction on internationally protected habitats.”</p> <p>Comment: It is good to see the plan is setting partnerships to resolve water supply and water neutrality. However, water quality is essential in water supply towards current and future water needs. How will partnership working be used to address water quality impacts.</p> <p>Suggested Modifications:</p>
REP/113 (2023)	Natural England		<p>Thank you for your consultation with Natural England early for our views on the Pre-submission local plan ahead of its publishing after the Pre-election Period shared with Natural England on 09 May 2023 and received on the same date. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England has reviewed:</p> <ul style="list-style-type: none"> • Submission Crawley Borough Local Plan 2024-2040 (PDF, 10.73 MB) (Submission Publication Consultation: May – June 2023) • Sustainability Appraisal - Strategic Environmental Assessment report May 2023 (PDF, 6.23 MB) • Habitats Regulations Assessment report January 2023 (PDF, 5.56 MB) • Local Plan map (low res) (PDF, 5.79 MB) <p>What follows are Natural England’s comments on: the draft plan as a whole, the plan’s Sustainability Appraisal (SA), the plan’s Habitats Regulations Assessment (HRA) and the specific policies and allocations of the plan.</p> <p>Please note that Natural England has not provided advice on all aspects of the plan, instead focusing on aspects within Natural England’s remit; the absence of comments on a policy should not be taken as Natural England giving support.</p> <p>Additionally, Natural England were consulted on the previous iteration of the above documents. Our previously issues advice is still relevant unless specifically stated otherwise. Our comments and views within this letter are relevant to the current submitted draft plan.</p> <p>Summary of our advice on the plan as a whole</p> <p>While we have raised some queries and recommended some further modifications to certain policies, we do not find the current plan unsound on any grounds relating to our remit.</p> <p>Suggested Modifications:</p>

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REP/113 (2023)	Natural England		<p>Comments on specific plan policies</p> <p>Our detailed comments on the policies and site allocations of the local plan are provided in the Annex 1. Please note that we have not provided comments on all policies but those which have most influence on environmental issues. Natural England has no comment to make on the policies not covered in this response. Other than confirming that we have referred to it when considering our advice on specific policies and site allocations.</p> <p>We have suggested some amendments and additions to both policies and supporting text throughout the Plan, notably on Green Infrastructure, Biodiversity net gain and Water Neutrality. In our view these could all be taken forward as minor modifications but if they were all acted upon they would leave the Plan stronger and more coherent in delivering for the natural environment, which is one of the three central tenets of genuinely sustainable development as set out in the National Planning Policy Framework (NPPF 2021, paragraph 8c). Our advice is explained in annex 1.</p> <p>Suggested Modifications:</p>
REP/027 (2023)	LRM Planning on behalf of WT Lamb Properties, the Dye Family and Elliott Metals/the Simmonds Family	Vision	<p>VISION & STRATEGY</p> <p>1. We are broadly supportive of the vision set out for Crawley in 2040, indeed it is unobjectionable that Crawley should be a place that people enjoy and want to live, work and visit. A key element of this is based on sustainable economic growth, accordingly we support the Council's approach which is that: 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 supports the overall prosperity of the region. Crawley will provide an environment that supports and encourages new and established businesses securing the supporting infrastructure, including telecommunications, to enable business to flourish. 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 assisted by learning and development opportunities that support an empowered resident workforce giving people a real choice about the work they can and want to do. It is clear that a strong approach towards employment land is required more than ever in Crawley with over half of the borough's jobs falling into the vulnerable or very vulnerable sectors. In this regard, we strongly support the Council in seeking to dovetail the plan with its Economic Recovery Plan which presents a vision for the borough's future socio-economic prosperity, supporting continued economic recovery through a series of flagship interventions. This includes the</p>

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			<p>unlocking of sufficient suitable land for new sites to provide for all Crawley's employment growth sectors and help boost jobs for residents, increasing economic resilience..."</p> <p>2. The plan recognises that there are significant land supply constraints faced by the borough and that a positive approach is required to support economic recovery. We are strongly supportive of this approach given the implications of COVID 19 and the need to significantly increase economic diversification. We note that there is currently an opportunity to increase the supply of employment land to help diversify the economy of the Authority so that it is not so dependent upon the recovery of air travel. This approach underlies our clients position, the contribution that their land can make to the plan and forms the basis for our representations.</p> <p>3. However we are seriously concerned however that the approach taken towards identification of sufficient employment land does not dovetail with the economic recovery plan rather it significantly underestimates the amount of employment land that is required despite there being a major opportunity to identify a comprehensive strategic site at Gatwick Green comprising a much larger area that would secure the long term ability of the Council to facilitate economic growth to match demand and ultimately diversification and recovery.</p> <p>4. Work undertaken by HJA in respect of the updated EGA suggests significant methodological shortcomings in the report prepared that result in a major underestimation of land required for employment purposes. Previous concerns that we have raised have not been addressed and as a result of this along with the failure of the EGA to robustly assess need, unless increased provision of employment land is identified the plan cannot be found sound.</p> <p>Suggested Modifications:</p>
REP/055 (2023)	Gatwick Green Ltd (The Wilky group)	Vision	<p>1.0 Introduction</p> <p>1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to the Vision for Crawley contained in the Draft Crawley Borough Local Plan, 2023 (DCBLP).</p> <p>1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy</p>

Local Plan General			
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			<p>EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation outlines GGL's strong support for the Vision for Crawley (DCBLP, page 18) and outlines its vision for Gatwick Green and how this will play a significant role in advancing the Vision for the town. The representation therefore focuses on that part of the Vision related to 'Improving Job Opportunities and Developing the Local Economy; Economic Growth and Social Mobility'.</p> <p>2.0 Crawley: A Vision</p> <p>2.1 The DCBLP Vision is for Crawley to be a modern, vibrant and sustainable town with strong and diverse communities and sustainable economic growth to make a place that people enjoy and want to live, work and visit. There are five key themes to the Vision relating to ensuring high-quality leisure and cultural facilities to support health and wellbeing; creating strong and diverse communities; improving job opportunities and developing the local economy to foster social mobility; delivering housing to meet local needs and reduce homelessness, and protecting the environment alongside sustainability. In relation to the economy, the Vision provides a blueprint for a socially-sustainable, healthy and inclusive community in Crawley in line with the advice in the National Planning Policy Framework (NPPF) and which underpins the policies in the Plan.</p> <p>2.2 The Vision sets out a forward thinking and ambitious prospectus for Crawley over the next 17 years. The key elements for the economy for Crawley are to (Savills emphasis):</p> <ul style="list-style-type: none"> • Strive to be the <u>premier town between London and the South Coast</u> providing jobs and learning opportunities and a leisure and cultural offer that is attractive to residents and visitors. • Be an <u>economic leader</u> with a diverse, resilient and productive economy that meets local needs and supports the prosperity of the region. • Have an environment that supports and encourages new and established businesses to grow and flourish, <u>supported by the necessary infrastructure to enable businesses to flourish</u>. • Be the <u>first choice of business location</u> for domestic and international markets. • Enable the community to benefit from access to high value and sustainable economic growth through thriving <u>innovation, entrepreneurship and advanced technologies</u>. • Create additional jobs across a diverse range of sectors, supported by <u>learning and development opportunities</u>. • <u>Redevelop / revitalise the Town Centre and Manor Royal Business District</u>. • Identify land for a new <u>industrial-led Strategic Employment Location to reinforce the status of Crawley as the place to do business in the South East</u>.

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>2.3 GGL fully supports the Vision for Crawley and all the above elements aimed at delivering a vibrant and world-class business location that also complements and supports the recovery and growth of the UK's second-largest airport at Gatwick. In addition to the policies on Economic Growth in the DCBLP, the Council is advancing its Vision for the town by putting in place a number of important initiatives – these include the regeneration of the Manor Royal Business District and the revitalisation of the Town Centre. These are key areas of investment to raise the quality of these key business quarters and will be supported by ambitious plans to improve the town's walking, cycling, bus and telecommunications infrastructure.</p> <p>2.4 Whilst these initiatives will significantly enhance the quality of the business environment and related communication networks, the scope to expand and diversify the local economy has in the past been limited by the lack of any significant employment allocations, specifically of a strategic scale in a highly sustainable location. Overcoming this constraint has been a key objective for the Council, the importance of which was emphasised by the Planning Inspector at the Advisory Panel in April 2020. The Council's response has been both proactive and positive by allocating 44 ha for an industrial-led Strategic Employment Location (SEL) at Gatwick Green east of the Airport.</p> <p>2.5 Gatwick Green, therefore, represents an important part of the Council's Vision for Crawley with the ability to deliver on a range of critical success factors within the Vision.</p> <p>3.0 Conclusion</p> <p>3.1 Gatwick Green Limited is a wholly owned subsidiary of the Wilky Group: the land is vested in Gatwick Green Limited. The Wilky Group is a family-owned and run company that has a 70-year track record of successful market-led development and property innovation across the UK. Their dedication to creating brand new places that help fulfil the true potential of those they serve has resulted in more than 80 successful development projects, all of which have led to a diverse range of job and training opportunities.</p> <p>3.2 Gatwick Green is being delivered by Gatwick Green Limited, and their team of industry experts, whose collective commitment to the project since 2015 will help support Crawley's ambition to become an economic leader by providing businesses and their staff a premium business location served by high-quality infrastructure.</p> <p>3.3 Gatwick Green provides Crawley and the wider region with a unique and timely opportunity to catalyse diversification, investment and economic growth; one that is perfectly placed to help power recovery with a next generation of logistics infrastructure, jobs, and training.</p>

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			<p>3.4 The diverse business and employment opportunities planned on-site, supported by high-quality education and training, will create a much-needed complementary offer to aviation, supporting future prosperity and resilience for Crawley and the wider region, with little displacement for existing employers at Manor Royal and other industrial areas.</p> <p>3.5 Through the provision of future-proofed infrastructure, sustainable transport and digital connectivity, and renewable energy provision, Gatwick Green will become a leading logistics destination where green space, the natural environment and technology are integral to its design.</p> <p>3.6 GGL's long-term commitment to supporting local business, education and skills communities is evidenced by leadership and participation in numerous initiatives including: Business South, (previously Enterprise First), Enterprise M3 Local Enterprise Partnership and the CBI's South East Council and SME Council. Through this, the Group has a proven record of supporting start-up and small businesses.</p> <p>3.7 With a track record of successful partnership and collaboration, GGL is keen to support communities by working closely with Crawley Borough Council, the Gatwick Diamond and local colleges to deliver the education and skills agenda through Gatwick Green.</p>

GatwickGreen

Where the Future Works

Welcome To Gatwick Green
Capacity To Deliver
For Growth & Recovery
Sustainability Matters
Better Together
Perfectly Located



WHERE THE FUTURE WORKS

Welcome to Gatwick Green

One of the most significant commercial developments in the South East, Gatwick Green will be a brand-new logistics hub designed with the future in mind.

A timely catalyst for diversification, investment and economic growth, Gatwick Green offers a unique opportunity for Crawley and the wider region, one that is perfectly placed to help power recovery with a next generation of logistics infrastructure, jobs, and training.



WELCOME TO GATWICK GREEN

On the doorstep of Crawley and the UK's second largest airport, Gatwick Green will be a pioneering and sustainable place that offers forward-thinking occupiers and their staff a scale of brand-new logistics property and employment opportunities unavailable elsewhere south of the M25.

Its strategic location also offers both domestic and international businesses an exceptional quality of multi-modal connectivity as well as direct access to a wide range of local skills and talent.

Designed to complement and enhance neighbouring economic anchors in and around Crawley, Gatwick Green will provide the essential foundations on which more productive, prosperous, and sustainable communities can be built.

Gatwick Green is being delivered by an experienced team whose long-term investment in the site, and record of successful property development and investment across the UK, demonstrates their dedication to creating a brand-new place that will play a crucial role in Crawley's future success.

 **47**
hectares allocated

 **2,000+**
new jobs

 **24.1**
hectares (minimum)

 **£79m+**
GVA per annum

 **77,800+**
(GIA) sqm total floor space

 **£55 million**
business rates over 20 years

WHERE THE FUTURE WORKS

Capacity to Deliver

With the pandemic reinforcing the growing importance of the logistics sector to the U.K. economy, market evidence demonstrates there is continued and strong demand for a scale and quality of prime logistics space currently unavailable in Crawley and the wider region.



CAPACITY TO DELIVER

This lack of available supply creates a strategic opportunity for the local economy to diversify and grow. Gatwick Green is a timely catalyst for economic recovery, one that is perfectly placed to help power recovery with a next generation of logistics infrastructure, jobs, and training.

Situated outside the Greenhouse and offering an exceptional quantity of shovel-ready opportunities, Gatwick Green is a timely catalyst for economic recovery, one that is perfectly placed to help power recovery with a next generation of logistics infrastructure, jobs, and training.

 **630**
on and off-site construction jobs over 2 years

 **£115 million**
estimated construction cost

 **£30 million**
(GVA) generated during construction

 **£127,000**
social value of apprenticeships during construction

WHERE THE FUTURE WORKS

For Growth & Recovery

Gatwick Green is part of a wider solution for Crawley and the surrounding region. Not only will it complement and enhance neighbouring economic anchors, including Manor Royal, Crawley Town Centre and a recovering Gatwick Airport, it will help diversify the local economy and provide the necessary foundations on which a range of commercial, employment-focused, facilities can be successfully delivered.



Local Plan General			
Ref. No.	Respondent	Policy/ Para	Comments
			<div data-bbox="745 280 1111 794"> <p>THE BARRICA & KIDDALE</p> <p>Crawley's minimum 1,000 new and well-paid jobs will be delivered through the delivery of the Barrica & Kidale development. The Barrica & Kidale development will provide a high quality of infrastructure, supporting future growth and resilience with the development for existing employees and future local residents.</p> <ul style="list-style-type: none"> 1,470 permanent on-site jobs (initial phase) 1,290 permanent on and off-site jobs for residents of Crawley £79 million GVA associated with the additional number of jobs per annum 645 director, management, professional and technical jobs up to £48,230 454 skilled trade occupations, process, plant, and machine operatives up to £3,710 367 admin, sales, service and elementary occupations up to £24,891 </div> <div data-bbox="1111 280 1462 794"> <p>WHERE THE FUTURE MEETS</p> <h3>Sustainability Matters</h3> <p>Designed to support green growth and sustainable businesses, Gatwick Green will provide an exceptional quality of infrastructure and accommodation, all specified to achieve a BREEAM Excellent rating, as well as delivering Net Zero emissions and carbon neutrality by 2050.</p> <ul style="list-style-type: none"> Net Zero by 2050 BREEAM Excellent Sustainable transport connectivity Renewable energy provision EV charging infrastructure Biodiverse green spaces </div> <div data-bbox="1462 280 1823 794"> <p>WHERE THE FUTURE MEETS</p> <p>Through the provision of future growth, the Barrica & Kidale development will provide a high quality of infrastructure and accommodation, all specified to achieve a BREEAM Excellent rating, as well as delivering Net Zero emissions and carbon neutrality by 2050.</p> <p>This high level of environmental performance will be achieved through the use of the UK's most advanced building standards, ensuring a high level of energy efficiency and reducing the carbon footprint of the development.</p> </div> <div data-bbox="745 798 1111 1311"> <p>WHERE THE FUTURE MEETS</p> <h3>Better Together</h3> <p>Gatwick Green is being delivered by The Wilky Group, and their team of industry experts, whose long-term investment in the site, and over 70-year track record of successful development and property innovation across the UK, demonstrates their dedication to creating brand new places that help fulfil the true potential of those they serve.</p> </div> <div data-bbox="1111 798 1462 1311"> <p>WHERE THE FUTURE MEETS</p> <p>The Wilky Group is committed to engaging with local authorities and key stakeholders to make the most of the potential of Gatwick Green, up to 100 acres, where public and private sector collaboration has been a success in the past and economic recovery and development.</p> <p>Ready and able to embrace the site for development, as part of an ongoing long-term vision for the area, The Wilky Group and their professional team have the capability and experience to deliver a 21st Century logistics hub for the benefit of Crawley and the wider region.</p> <ul style="list-style-type: none"> £4.3 million business rates income per annum £55 million business rates income over 20 years £15.8 million corporation tax per annum £49 million private tax per annum </div> <div data-bbox="1462 798 1823 1311"> <p>WHERE THE FUTURE MEETS</p> <h3>Perfectly Located</h3> <p>On the doorstep of Crawley town centre and the UK's second largest airport, Gatwick Green will offer both domestic and international businesses an exceptional quality of multi-modal connectivity, as well as direct access to a wide range of local skills and talent.</p> </div>

Local Plan General			
Ref. No.	Respondent	Policy/ Para	Comments
			<div data-bbox="745 280 1568 863" data-label="Complex-Block"> <p>One of the UK's best connected logistics hubs, Gatwick Green's strategic location will provide occupiers with seamless access to the M23 and wider M25 motorway network, as well as flights to over 250 international destinations.</p> <p>Once complete, it will provide a truly unique opportunity for 21st Century businesses and their staff to prosper in a place where integrated transport network, high-speed digital connectivity and future-proofed address codes is standard.</p> <p>M23 adjacent to junction 9</p> <p>15 mins to Crawley Town Centre</p> <p>27 mins to London</p> <p>2nd largest airport in UK next door</p> <p>230+ international flights from Gatwick</p> <p>For more information, please contact: Sally Fish - MBECS Property Director The Wilky Group T: 01483 235 200 www.wilky.co.uk</p> <p>WILKY GROUP</p> </div> <p>Suggested Modifications:</p>
REP/113 (2023)	Natural England	Vision	<p>Comments on local plan's Vision</p> <p>We support your vision's focus on protecting the environment and sustainability. We specifically support the strong focus on: CO2 emission reduction, water efficiency, green growth, conservation of natural resources, reduction of pollution, biodiversity net gain, protection of priority species/habitats and the delivery of ecosystem services. Which are in line with the aims of section 15. of the National Planning Policy Framework (NPPF) and the overarching goals and actions of the government's Environmental Improvement Plan (EIP).</p> <p>Suggested Modifications:</p>
REP/152	Save West of Ifield Campaign	Crawley: A Vision	<p>The Local Plan highlights the need for improved healthcare and facilities for residents of the town and that they will be delivered locally (page 18). However, it fails to say how this will happen and fails to recognise or mention the additional pressure that will be placed on these already strained services by people using them who reside in the out of town developments such as West of Ifield? This is a serious omission in the Local Plan.</p>

Local Plan General			
Ref. No.	Respondent	Policy/ Para	Comments
			Suggested Modifications:
REP/152	Save West of Ifield Campaign	Crawley: A Vision	<p>The Local Plan states that local communities will be directly involved in planning how the town grows (Page 18). How does it reconcile this worthy sentiment with the fact that other local authorities seem intent on placing their housing developments on the borders / outskirts of Crawley including the potential West of Ifield development. Neither CBC or local communities have any influence or input into these developments.</p> <p>Suggested Modifications:</p>
REP/119 (2023)	Turley on behalf of A2 Dominion	2.30 – 2.33 – Adjacent to Crawley	<p>Development adjacent to Crawley</p> <p>Paragraphs 2.30 – 2.33 of the draft Local Plan relate to the growth of Crawley outside of its administrative boundaries and, in turn:</p> <ul style="list-style-type: none"> • Paragraph 2.31 refers to planned development in other authorities • Paragraph 2.32 states that “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.” • Paragraph 2.33 states that “This plan should not be considered as an indicator of the extent of acceptable development adjacent to Crawley.” <p>In our opinion, the Crawley Local Plan should not seek to identify the potential locations for growth outside of Crawley. However, that is what appears to be inferred by paragraph 2.32. It is quite right that the Local Plan does identify a significant unmet housing need, but it is for the adjoining authorities to accommodate this. Further analysis may well indicate that such opportunities exist to the south of Crawley. Our proposed approach is reinforced by the text at paragraph 12.21 of the Local Plan which refers to the complexities associated with the westward expansion of Crawley and the Western Link Road.</p> <p>Suggested Modifications:</p> <p>We consider that paragraph 2.32 should be amended as follows in order to ensure consistency with paragraph 2.33:</p> <p><i>“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 around Crawley can accommodate its growth 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.”</i></p>
REP/152		Para: 2.36	The Local Plan rightly recognises the positive impact that connective ecological networking and biodiversity has on mental and physical wellbeing of the town's residents (Page 27 para. 2.36). However, it fails to

Local Plan General			
Ref. No.	Respondent	Policy/ Para	Comments
	Save West of Ifield Campaign		<p>identify or comment on how this is being impacted on by the loss of local green space and amenities by out of town developments such as West of Ifield. Crawley's precious green space is being rapidly eroded and lost. The Local Plan identifies the importance on health on health of access to green open spaces (Page 35) but again fails to deal with these being lost on the town's borders by housing development.</p> <p>Suggested Modifications:</p>

Chapter 3. Sustainable Development									
Ref. No.	Respondent	Policy/ Para	Comments						
REP/011 (2023)	National Highways	SD1	<p>Table 3 (below) sets out more detailed representations. These are suggestions for how the Plan and its policies could be made clearer and robust, to assist plan users.</p> <p>Table 3: Detailed Representations</p> <table border="1"> <thead> <tr> <th>NH Rep. No.</th> <th>Local Plan Reference</th> <th>NH response</th> </tr> </thead> <tbody> <tr> <td>NH007</td> <td>Policy SD1: Presumption in Favour of Sustainable Development</td> <td>This over-arching strategic policy needs to be strengthened by responding positively to the expectations of Circular 1/2022. For example, reference should be made to reducing the overall need to travel, especially by car, through layout and design of developments.</td> </tr> </tbody> </table> <p>Suggested Modifications:</p>	NH Rep. No.	Local Plan Reference	NH response	NH007	Policy SD1: Presumption in Favour of Sustainable Development	This over-arching strategic policy needs to be strengthened by responding positively to the expectations of Circular 1/2022. For example, reference should be made to reducing the overall need to travel, especially by car, through layout and design of developments.
NH Rep. No.	Local Plan Reference	NH response							
NH007	Policy SD1: Presumption in Favour of Sustainable Development	This over-arching strategic policy needs to be strengthened by responding positively to the expectations of Circular 1/2022. For example, reference should be made to reducing the overall need to travel, especially by car, through layout and design of developments.							
REP/087 (2023)	Woodland Trust	SD1	<p>Response from the Woodland Trust</p> <p>The Woodland Trust is the UK's leading woodland conservation charity and wants to see a UK that is rich in native woods and trees, for people and wildlife. We aim to achieve this by restoring and improving woodland biodiversity and increasing people's understanding and enjoyment of woods and trees.</p> <p>We own over 1,275 sites across the UK, covering over 23,580 hectares, and we have around 500,000 members and supporters. The Trust is recognised as a national authority on woods and trees, and the benefits and value that they deliver for climate, nature, and society.</p> <p>We welcome the opportunity to comment on the Crawley Local Plan Submission Draft.</p> <p>Note: we consider all the policies to be legally compliant and sound unless otherwise stated in the response.</p> <p>Policy SD1 Sustainable Development</p> <p>We welcome this policy, in particular point 1) the priority given to Crawley's commitment to being carbon neutral by 2050 and point 4) protecting and enhancing green infrastructure and biodiversity.</p> <p>Suggested Modifications:</p>						
REP/011 (2023)	National Highways	SD2	<p>This should promote visions for developments which set outcomes communities want to achieve. Underpinning these visions should be the need for developments to reduce the need to travel, especially by car, and to maximise opportunities for sustainable travel. This is needed to promote health and well-being, as well as reducing the reliance on the SRN for local journeys. This proposed change would help demonstrate compliance with the expectations of Circular 1/2022.</p> <p>Suggested Modifications:</p>						

Chapter 3. Sustainable Development			
Ref. No.	Respondent	Policy/ Para	Comments
REP/029 (2023)	Sport England	SD2 3.19	Paragraph 3.19 is supported for the reasons set out in Sport England's representations on policy SD2 of the 2020 submission consultation. However, minor updates are requested to paragraph 3.19 to reflect that Sport England's Active Design guidance has been reviewed in 2023. While the 10 Active Design principles referenced in the paragraph have been maintained some minor amendments have been made to the wording of some of the principles, notably principles 3, 4, 7, 8, 9 and 10. The reviewed guidance is now supported by Active Travel England and the Office for Health Improvement and Disparities (OHID) rather than Public Health England that has now been replaced by OHID.
			<p>Suggested Modifications:</p> <p>Minor amendments are requested to paragraph 3.19 ensure that the references to Active Design are up-to-date and accurate. The wording of the applicable Active Design principles should be amended to reflect the wording of the principles in the latest guidance - see the Active Design guidance document on Sport England's website for details https://www.sportengland.org/guidance-and-support/facilities-andplanning/design-and-cost-guidance/active-design. Reference to "Sport England and Public Health England" should be replaced by "Sport England supported by Active Travel England and the Office for Health Improvement and Disparities".</p>
REP/152	Save West of Ifield Campaign	3.20	The Local Plan identifies the need for Planning and Health Impact Assessments to plan for health services and hospitals in any developments within the town's boundaries (Para. 3.20). This is laudable but fails to recognise the inability of CBC to control or influence the provision on such services from developments, such as West of Ifield, on the town's borders. East Surrey Hospital and local health services within the town are already under intense pressure which will only be increased by the additional demand from such developments. This is an unacceptable omission given that the Local Plan recognises the need for growing health care facilities including GP and dental services (Page 148, Para. 11.19)
			<p>Suggested Modifications:</p>

Chapter 3. Sustainable Development			
Ref. No.	Respondent	Policy/ Para	Comments
REP/066 (2023)	Mid Sussex District Council	SD3	<p>Crawley Local Plan 2024 – 2040 – Submission version (June 2023) Mid Sussex welcomes the opportunity to comment on the submission Crawley Local Plan (the Plan) and our detailed comments build on our earlier response to the Regulation 18 draft of the Local Plan and those made in March 2020 in relation to the first regulation 19 consultation and the second in June 2021. It is noted that comments made to previous consultations do not need to be repeated and all Regulation 19 representations will be submitted in full to the Secretary of State for the Examination. For ease, a copy of our responses made in March 2020 and June 2021 is attached.</p> <p>In a letter dated 14 April 2023 to Mid Sussex DC, Crawley BC also sought confirmation of the role Mid Sussex can make in assisting Crawley to address unmet housing needs and specific communities housing needs. Mid Sussex District Council's response to this request is also set out in this letter.</p> <p>Local Plan Comments Mid Sussex has reviewed Crawley's Plan and accompanying evidence that has been prepared to support the Plan.</p> <p><u>Strategic Policy SD3: North Crawley Area Action Plan (now deleted)</u> Mid Sussex is disappointed that this policy has been deleted and therefore that an opportunity to review the future growth and operational needs of the airport alongside other development needs of Crawley, including economic growth and housing, to enable efficient use of land within Crawley is no longer included.</p> <p>Our previous comments made in March 2020 and June 2021 remain relevant.</p> <p>Suggested Modifications:</p>

Viability Assessment/Planning Obligations Annex			
Ref. No.	Respondent	Policy/ Para	Comments
REP/021 (2023)	Gladman Developments	SCD4 Viability	<p>Viability Gladman note the updated Viability Assessment (December 2022) which is primarily in relation to WRZ and the cost of mitigation solutions for new developments.</p> <p>The Council anticipate that the cost of mitigation will reduce once improvement measures are introduced by Southern Water, but at present such cost calculations are assumptions supported by the Sussex North Water Neutrality Study. On this basis, the viability study states that Council have considered that £2,000 per dwellings as a reasonable assumption to achieve the standards.</p> <p>However, the water neutrality study sets out a number of mitigation solutions which is usefully summarised within the Joint Water Neutrality Topic Paper. Paragraph 3.27(2) states that to achieve the water efficiency standard of 85 litres per day, per person the following measures can be employed and the associated costs:</p> <ul style="list-style-type: none"> - Fittings-based approach: between £349 and £431; - Fittings-based approach if appliances are not part of the standard fit-out: between £1,049 and £1,531; and - Greywater recycling: between £4,000 and £4,340. <p>This suggests that it may be more costly to deliver water efficiency standards than is considered in the viability study. Therefore, it is necessary to update the viability study to account for the higher cost scenario.</p> <p>Furthermore, these approaches do not account for the emerging offsetting scheme and the cost for developers to access the scheme, which have not been finalised yet. This is a considerable uncertainty which has not been factored into the updated viability study.</p> <p>The above highlights further reasons to await further clarification on water neutrality issues to properly justify the requirements of the Local Plan and ensure that all of the identified development needs of the borough are met.</p> <p>Suggested Modifications:</p>
REP/032 (2023)	West Sussex County Council	IN1 (Viability Assessment)	<p>Policy IN1 (Infrastructure Provision) is worded flexibly to secure CIL contributions or S106 for the funding of education infrastructure.</p> <p>WSCC would like to withdraw its previous comment (from 2021) in relation to the 'Whole Plan Policies and Community Infrastructure Levy Viability Assessment' (March 2021). The Viability Assessment update (December 2022) clarifies that, there is the possibility of s106 monies for education and other infrastructure being appropriate outside of the scope of CIL but no such strategic scale/neighbourhood-level development is currently proposed in the local plan and therefore this scenario is unlikely and unforeseeable.</p>

Viability Assessment/Planning Obligations Annex			
Ref. No.	Respondent	Policy/ Para	Comments
			Suggested Modifications:
REP/133 (2023)	The Planning Bureau	H5 Viability	<p>McCARTHY STONE RESPONSE TO CONSULTATION ON THE CRAWLEY BOROUGH DRAFT LOCAL PLAN 2024-2040 (REGULATION 19) SUBMISSION PUBLICATION CONSULTATION (MAY TO JUNE 2023)</p> <p>Thank you for the opportunity to comment on the Crawley Borough Draft Local Plan 2024 – 2040 (Regulation19), submission publication consultation. McCarthy Stone is the leading provider of specialist housing for older people including retirement housing and extra care housing in the UK. Please find below our comments on the consultation.</p> <p>We note that this is a further regulation 19 consultation and that the website states that ‘If you submitted a response to a previous Regulation 19 consultation, you do not need to resubmit or repeat these. Responses from the previous Regulation 19 consultations will be submitted, in full, to the Secretary of State for the Local Plan’s examination, along with responses received in this consultation.’. We have therefore responded to this consultation on the basis that our representation, REP/133, made on the 30th June 2021 will still be submitted alongside this representation but have the following further comments to make. In addition, we highlight that we still maintain our comments / objections to policies DD1, DD4, ST2 and H3. In particular, we are disappointed that the Council have not considered incorporating a stand along policy supporting the delivery of housing for older people, given the need, in line with our comments to H3.</p> <p><u>Policy H5 Affordable housing.</u></p> <p>We provided a detailed response to the 2021 Regulation 19 consultation and being mindful of the guidance in the PPG that confirms it is the responsibility of site owners and developers to engage in the Plan making process we provided a separate document to that consultation that undertakes viability appraisals for the sheltered and extra care older persons’ housing typologies. Within this viability appraisal, we challenged some variables within the ‘Crawley Borough Local Plan Review: Whole Olan Policies and CIL Viability Assessment, March 2021’ (Dixon Searle). Our representation concluded that older person’s housing is not able to provide an affordable housing contribution or CIL in Crawley and recommended that ‘Specialist older persons’ housing including sheltered and extra care accommodation will not be required to provide an affordable housing contribution’.</p> <p>As a result of our representation no amendments to the plan appear to have been made. The council have published a ‘Viability Assessment – Updated, December 2022’ (Dixon Searle) (Viability Assessment) to support this consultation however this does not discuss or update viability analysis of specialist housing for older people (sheltered / extra care).</p> <p>This lack of amendment or update is surprising given our detailed viability appraisal of sheltered and extra care schemes that identified discrepancies in the inputs to viability in terms of dwelling mix, sales period</p>

Viability Assessment/Planning Obligations Annex			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>site works, profit, sales and marketing costs and sales values. Since the original Viability Assessment was undertaken build costs have also increased and sales values have been more challenging, both of which will affect viability further.</p> <p>We would remind the Council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that “The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan” (Paragraph: 002 Reference ID: 10-002-20190509). The evidence underpinning the Council’s planning obligations and building requirements should therefore be robust.</p> <p>The viability of specialist housing for older people is more finely balanced than ‘general needs’ housing and although we commend the Council in testing the older people’s housing typology within the Viability Assessment, as this accords with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG, we are disappointed that our representation has not been considered in detail and changes incorporated within the plan. If this is not done, the delivery of much needed specialised housing for older people may be significantly delayed with protracted discussion about other policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need.</p> <p>We therefore recommend that the Council ensure that a further update to the Viability Assessment is undertaken to inform the plan. The update must consider older person’s housing and the inputs discussed in our previous representation. If older person’s housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and delaying the provision of much needed older persons housing.</p> <p>Suggested Modifications: Recommendation: The viability evidence is updated to make sure it is up to date, the outcomes then incorporated into the plan and we would recommend the following text is added to policy H5. ‘Specialist older persons’ housing including sheltered and extra care accommodation will not be required to provide an affordable housing contribution’</p>
REP/055 (2023)	Gatwick Green Ltd (The Wilky Group)	Planning Obligations Annex	<p>1.0 Introduction</p> <p>Background</p> <p>1.4 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green</p>

Viability Assessment/Planning Obligations Annex			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>Limited. This representation relates to the Planning Obligations Annex in the Daft Crawley Borough Local Plan, 2023 (DCBLP).</p> <p>1.5 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>Scope of representation</p> <p>1.6 This representation sets out the evidence in support of the Planning Obligations Annex (the Annex) with reference to:</p> <ul style="list-style-type: none"> • The National Planning Policy Framework (NPPF, 2021). • The Planning Practice Guidance (PPG). <p>2.0 Planning Obligations Annex Intention of the Annex</p> <p>2.1 The purpose of the Planning Obligations Annex is to provide the basis for developer contributions, the in-principle need for which is established in various planning policies in the DCBLP. The DCBLP is supported by a Whole Plan Policies & Community Infrastructure Levy Viability Assessment and related update¹, which through an iterative process demonstrated that the optimum approach was taken to ensure the Plan secured the necessary requirements in order to make development acceptable in planning terms, whilst being viable and deliverable. The overarching policy that requires planning obligations related to development is Strategic Policy IN1.</p> <p>2.2 The Annex is therefore important to ensure development within Crawley is served by, and helps provide, infrastructure of a suitable scale, quality and location so as to avoid harmful impacts. The Annex sets out the basis for planning obligations under various policies in the form of works or derived from contribution amounts based on formulas or generic approaches. This includes a formula for a sustainable transport contribution, which applies to all residential and commercial developments outside of the Gatwick Airport Boundary.</p>

¹ For: Crawley Borough Council Crawley Borough Local Plan Review: Whole Plan Policies & Community Infrastructure Levy Viability Assessment, Dixon Searle Partnership for Crawley BC, Final Report Issued March 2021 | Viability Assessment - Update and Viability Assessment – Update Appendix I: Results summary tables & sample appraisal summaries, Dixon Searle Partnership for Crawley BC, December 2022

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			<p>National planning policy and guidance</p> <p>2.3 The Annex is considered to be in accordance with the policy and guidance contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The need to plan for and protect infrastructure features throughout the NPPF. In relation to strategic infrastructure related to strategic land use policies such as Strategic Policy EC1 and Strategic Policy EC4, the NPPF requires those policies to make sufficient provision for, <i>inter alia</i>, infrastructure to serve strategic development; such infrastructure includes transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, the provision of minerals and energy (including heat), and community facilities (such as health, education and cultural infrastructure) (para 20). The NPPF requires joint working between strategic policy-making authorities and relevant bodies to determine where additional infrastructure is necessary (para 26).</p> <p>2.4 Local Plans should set out the contributions expected from development, including for 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 (para 34). Paragraphs 55 – 58 deal with planning obligations to bring about the delivery of infrastructure related to new development. The policy guidance states that planning authorities should use conditions on a planning permission where possible, or otherwise where a condition is not appropriate, use planning obligations. Where planning obligations must be secured, they must only be sought where they meet the tests set out in Regulation 122(2) of the Community Infrastructure Levy (CIL) Regulations 2010, i.e. they are 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.</p> <p>2.5 NPPF paragraph 58 goes on to confirm the importance of up-to-date policies that identify contributions expected from development – planning applications in accordance with such policies will be treated as being viable in line with the viability assessment of the Local Plan. The weight to be given to scheme-specific viability assessments at the application stage will depend on how up-to-date the Plan and related viability assessment are and any changes in the circumstances of the site since the Plan was adopted.</p> <p>2.6 The importance of providing infrastructure features throughout the NPPF in relation to achieving sustainable development (para 8a); building a strong and competitive economy (para 81); promoting healthy and safe communities (para 92c); promoting sustainable transport (Section 9); supporting high quality communications (Section 10), and meeting the challenges of climate change (Section 14).</p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>2.7 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on planning obligations². PPG sets out guidance on the scope, nature and use of planning obligations under CIL or developer contributions. PPG states that policies for planning obligations should be set out in plans and examined in public, and informed by evidence of infrastructure needs and a proportionate assessment of viability (Paragraph: 004 Reference ID: 23b-004-20190901).</p> <p>2.8 It is considered that the Annex provides an appropriate basis for securing reasonable and proportionate planning obligations from new development. It is therefore consistent with national policy and guidance on infrastructure and planning obligations, and so represents <u>sound guidance in the context of the tests at paragraph 35 of the NPPF</u>.</p> <p>The need to retain flexibility in application</p> <p>2.9 PPG states that the evidence of need for infrastructure can be standardised or formulaic, and plan-makers should consider how needs and viability may differ between site typologies and may choose to set differential requirements. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. PPG also states that developers may be asked to provide contributions for infrastructure in several ways (Paragraph: 003 Reference ID: 23b-003-20190901), implying that there should be flexibility in how that is achieved, such as through planning obligations or contributions under CIL.</p> <p>2.10 PPG goes on to state that “...if a formulaic approach to developer contributions is adopted, the levy can be used to address the cumulative impact of infrastructure in an area, while planning obligations will be appropriate for funding a project that is directly related to that specific development”. Whilst this guidance implies a binary approach to the funding and delivery of infrastructure, in reality the picture will be somewhat less clear. Some infrastructure ‘projects’ may be clearly required, whilst others may in part/full be triggered by past/future underlying growth or other development; in such cases, this may require a more nuanced approach. This therefore implies that the DCBLP should include some text that reflects the need for a flexible approach to the application of the Annex.</p> <p>2.11 However, this flexibility is not reflected in the Annex. Pages 270-271 of the DCBLP set out the approach to planning obligations and CIL, but it is considered that the Plan would benefit from some text to summarise the core of the Council’s approach and its role in working with developments to bring infrastructure forward. Aligned with the need for some flexibility, TWG has made representations to Strategic Policy EC4, which include the removal of the clause that precludes the</p>

² <https://www.gov.uk/guidance/planning-obligations>

Viability Assessment/Planning Obligations Annex			
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			<p>application of a s106 sustainable transport contribution to Gatwick Green – this would also align the policy with the Annex.</p> <p>2.12 More specifically, there is a need for flexibility in relation to meeting the obligation in relation to employment and skills development under Policy EC5. The policy and the Annex require development to contribute by (1) committing to a site-specific employment and skills plan, and (2) making a proportionate financial contribution towards employment and skills initiatives in Crawley.</p> <p>2.13 TWG supports the objectives behind these obligations, but considers that there is a need for more flexibility in the case where a development provides on-site employment and skills training capacity, that ought to be assessed as providing for skills training, in lieu of a contribution under Policy EC5 and the Annex (DCBLP page 278, item (ii)). For large scale developments, such a Gatwick Green, providing on-site skills and apprenticeship training facilities in the area of strategic logistics and advanced manufacturing would provide a suitable alternative way of delivering significant social and economic value to Crawley. Therefore, there should be flexibility in the application of Policy EC5, in combination with the Annex, to recognise that such value can equally be provided as works in lieu of a financial contribution.</p>
			<p>Suggested Modifications:</p> <p>3.0 Proposed changes to the Planning Obligations Annex</p> <p>3.1 In order to reflect the need to ensure a flexible approach to the identification of the most appropriate form of planning obligations and the Council’s role in that, it is proposed that the following text be added to the end of the first paragraph on page 271 of the DCBLP: <i>“In summary, infrastructure will be funded via CIL or development contributions under s106, or otherwise provided as works undertaken by developers so as to make development acceptable in planning terms. Crawley Borough Council will work with developers to secure the delivery of infrastructure.”</i></p> <p>3.2 In order to acknowledge that the contribution towards employment and skills training in Crawley could be in the form of on-site skills training and education facilities, the following text should be added to the paragraph on page 282 of the Plan under the heading ‘Policy EC5: Employment and Skills Development’: <i>“It is recognised however, that for some major developments, it may be more appropriate for provision to meet part ii.) of the policy to be in the form of on-site education and skills training facilities to be funded by the development and its occupiers.”</i></p>

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REP/168	Network Rail	Local Plan Housing – Unmet Needs Infrastructure Requirements Planning Obligations	<p>NETWORK RAIL RESPONSE TO CRAWLEY BOROUGH COUNCIL LOCAL PLAN (REGULATION 19) CONSULTATION</p> <p>Thank you for providing Network Rail the opportunity to make comment on the Regulation 19 version of the Local Plan. Network Rail have previously submitted comments around Gatwick Airport and the work that has been undertaken, the below are additional covering other issues and the latest evidence base documents.</p> <p>Network Rail is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland, and Wales. As statutory undertaker, Network Rail is under license from the Department for Transport (DfT) and Transport Scotland (TS) and regulated by the Office of Rail and Road (ORR) to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway. As a matter of course, proponents of sites which are close to the railway boundary or sites which could affect the railway asset directly are required to engage with our Asset Protection and Optimisation team (ASPRO). Similarly, there are a range of level crossings (both vehicle and pedestrian) that will experience increased usage from the proposed developments proposed within the draft Local Plan. As part of Network Rail's license to operate and manage Britain's railway infrastructure, Network Rail have the legal duty to protect rail passengers, the public, the railway workforce, and to reduce risk at our level crossings so far as is reasonably practicable. A case-by-case risk assessment is required for the affected level crossings as and when planning applications are made and full details of the development has been provided. The assessments may identify that improvements / closure of level crossing is required to mitigate the imported risk. As a public funded company, Network Rail has responsibilities to spend public funds efficiently which consequently means we do not have the funds available to mitigate the impact of third party development on level crossings. Consequently, Network Rail expect any mitigation required to be funded at no expense to Network Rail.</p> <p>Suggested Modifications:</p>

Crawley

Local Plan

Wellbeing & Communities

Regulation 19 Consultation May-June 2023 Representations

Local Plan Chapters 4 – 8 & Infrastructure Plan

Chapter 4. Character, Landscape and Development Form			
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REP/035 (2023)	Vail Williams on behalf of Ardmore Ltd	CL3	<p>Policy CL3: Character, Landscape & Development Form In regard to design the Local Plan Review, Chapter 4: Character, Landscape & Development Form, also sets out under Policy CL3: Movement Patterns, Layout and Sustainable Urban Design that all development should seek to use land more efficiently and sustainably. The policy states that any development should “<i>integrate land uses and movement networks.</i>”</p> <p>We contest that Policy ST4 is consistent and robust when consider against Policy CL8 by virtue of allocating development at Gatwick Green despite Policy CL3 stating that development that development “ <i>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... and put people before traffic and encourage walking and cycling through establishing a layout of pathways which: <u>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.</u></i> (Emphasis added).</p> <p>Suggested Modifications: As per our comments under EC4, we therefore submit that the Strategic Employment Allocation at Gatwick Green is inconsistent with CL3 and is unsound and unjustified.</p>
REP/066 (2023)	Mid Sussex District Council	CL3	<p><u>Policy CL3 – Movement Patterns, Layout and Sustainable Urban Design</u> This policy was part of CL4 in the 2020 version, previous comments made in March 2020 and June 2021 remain relevant.</p> <p>Suggested Modifications:</p>
REP/033 (2023)	Horsham District Council	CL4	<p>Strategic Policy CL4: Compact Development – Layout, Scale and Appearance We support this policy in principle, but consider it is not justified as stands.</p> <p>We welcome that the policy sets out minimum densities that are higher than previously used. This is an important step in ensuring no stone is unturned in seeking to maximise meeting identified housing needs in Crawley.</p> <p>We note that Reasoned Justification paragraph 4.43 states: “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 level in order to maximise effective use of land without creating significant harm to amenity and character.”</p> <p>In our comments submitted to the previous Regulation 19 Plan (Jun 2021), we noted that the forthcoming Densification Study would be likely critical in addressing our concerns with regards making optimal use of development land in Crawley and provide justification for the density ranges in Policy CL4. We are pleased to see that such a study has been completed and consider that the Compact Residential Development Study (May</p>

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			<p>2023) presents a very comprehensive theoretical analysis of good practice in higher density design, with particular focus on high accessibility corridors.</p> <p>However, we have struggled to find explanation within the study for the density ranges in the policy (i.e. minimum 200dpa for high density, 60-200dpa for moderate density, and 45dpa elsewhere). We have also been unable to identify any methodology for determining appropriate density ranges for specific character areas (for example differentiating between town centre predominance of apartment blocks, Victorian terrace neighbourhoods, post-war municipal housing, etc). Such analysis should have provided benchmarks against which to assess individual sites (without a live planning permission) to feed into the SHLAA (which should seek the highest workable number of homes for the site), and in turn the calculation of overall urban capacity. In other words, the assessment of the town's existing density levels should be transparently presented and related to the density thresholds in Policy CL4.</p> <p>Suggested Modifications: Change sought: Further update to the evidence base document is sought to provide a spatial analysis of what density ranges are appropriate in given contexts. This should transparently present the assessment of the town's existing density levels and demonstrate the density ranges / minima to be sufficiently challenging by way of maximising use of development land.</p>
REP/066 (2023)	Mid Sussex District Council	CL4	<p><u>Policy CL4 – Compact Development – Layout, Scale and Appearance</u> This policy was part of CL5 in the 2020 version, previous comments made in March 2020 and June 2021 remain relevant.</p> <p>Mid Sussex supports this policy in principle as it seeks to make more efficient use of land.</p> <p>The Council notes that the policy has been amended to support the requirement for higher density outside locations identified in (i) and (ii), but considers that the Policy would be more effective if the 'appropriate levels of accessibility to enhance public transport services' are defined.</p> <p>Suggested Modifications: Changes required: An explanation of how 'appropriate levels of accessibility to enhance public transport services' will be defined is also required.</p>
REP/137	Resident 53	CL4	<p>I assume the document is compliant to the above or it would not have been presented and so have marked accordingly with the exception of 'sound', as dwellings per hectare is rather vague to the person having to live at the property.</p> <p>Surely this should be a major concern for residents wellbeing and health & safety due to the risk of fire spreading between dwellings and additionally the side of property maintenance of these dwellings as time requires.</p> <p>Suggested Modifications: I believe there should be a distance between dwellings incorporated within the text not just a vague properties per hectare and this should be agreed with the local fire service taking into account future maintenance requirements.</p>

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REP/160	Chichester District Council	CL4	<ul style="list-style-type: none"> supports the introduction of high-density targets for the Town Centre and accessible locations (Policy CL4) and the housing typology policies (Policy H3, H3a – H3f) which will help to maximise capacity and positively influence development opportunities. <p>Suggested Modifications:</p>
REP/167	Muller Property Group (Agent: Walsingham Planning)	CL6	<p>Draft Crawley Borough Local Plan 2024-2040 Regulation 19 Consultation May-June 2023 Representations on behalf of Muller Property Group Consultation Reference: Policies CL6, HA5, and H5 I write on behalf of Muller Property Group to formally respond to the Council's Local Plan Review Proposed Submission (Regulation 19) consultation.</p> <p>Muller Property Group control a site at 1066 Balcombe Road Crawley on which they are progressing proposals for a new care home. A planning application was refused by Crawley Borough Council in April 2023 and a new application is being prepared which responds to the Council's reasons for refusal. At the same time they are considering their appeal position.</p> <p>The representations are made in the context of a new care home on this site that lies within the Crawley built up area and which forms part of the Forge Wood 'Key Housing Site' for new residential development.</p> <p>The focus of this response is with draft Polies CL6, HA5, and H5. These representations will deal with each Policy in turn.</p> <p>Policy CL6: Structural Landscaping The proposed wording states:</p> <p>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 and should enhance the prominence, legibility and visibility of these natural assets through the orientation and layout of new development. Proposals should protect and/or enhance, including through extending and connecting areas of structural landscaping where appropriate. The visual impact of proposals on structural landscaping should be demonstrated.</p> <p>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.</p>

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			<p>It is unclear on what basis areas on the policies map have been selected as structural landscaping and the justification for doing so. There is no justification or analysis provided within the draft plan.</p> <p>With regards to Balcombe Road where Muller's interest lies, the current Plan doesn't include this designation whereas the proposed policies map has structural landscaping abutting and directly opposite the site. The site is currently allocated for residential development and sits within the built up area of Crawley. The Forge Wood Key Housing Site and other nearby housing developments on the opposite side of Balcombe Road currently being built out mean that the area is undergoing significant change.</p> <p>It is not clear what has changed from the current situation to warrant the Council to consider these "structural landscaping" designations. The trees are not the subject of a Tree Preservation Order and the site does not lie in a Conservation Area. The policy appears to be attempting to introduce a new layer of protection where none currently exists.</p> <p>The change in this area is in the direction of growth and development. It is an area of mixed character and the new residential developments on either side of Balcombe Road will be experienced when in the area. A "structural landscaping" designation and draft policy wording is seemingly at odds with the changing character of the area, the site allocation, and developments being built out.</p> <p>Many of the criteria set out within the draft Policy could easily be interpreted as development or change being inappropriate, it offers significant scope to object to a development affecting "structural landscaping" for highly subjective reasons.</p> <p>There are already a suite of adopted development plan policies which deal with character and landscaping, and any potential impacts which may arise from development affecting such areas can be assessed and controlled under current policy which can be repeated in the new Local Plan.</p> <p>The wording of the Policy and some of the areas which have been designated make it unsound. It is not justified, and the subjectivity of the wording makes it not effective.</p> <p>Suggested Modifications:</p>
REP/055 (2023)	Gatwick Green Limited	CL7	<p>1.0 Introduction</p> <p>1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to Policy CL7 Important and Valued Views in the Draft Crawley Borough Local Plan, 2023 (DCBLP).</p>


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			<p>1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by TWG/GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) (the Site) under Strategic Policy EC4 of the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation notes that Policy CL7 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2021) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy CL7.</p> <p>2.0 Policy CL7 – intent of policy and compliance Intention of the policy</p> <p>2.1 The purpose of Policy CL7 is to protect and/or enhance important views across the Borough. The change in levels from the High Weald to the Low Weald allow views across the area, contributing to its character.</p> <p>2.2 Policy CL7 has three sections identifying Linear Contained Views, Long Distance Views and Valued Landscape and Views. It also sets out that Area Based Character Assessments will further identify valued localised views and valued landscape, and that the visual impact of proposals affecting Important and Valued Views must be clearly and accurately demonstrated.</p> <p>National planning policy and guidance</p> <p>2.3 The policy is considered to be in accordance with the policy and guidance contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The NPPF sets out the objectives of the planning system with regard to achieving well-designed places (paras 130 and 133-134), and specifically with regard to the need for development to be sympathetic to the landscape setting of a site (para 130(c)). Policy CL7 embodies these national planning policy objectives, tailored to the local circumstances pertaining to the High Weald and the Low Weald and locally defined long distance and linear contained views on the Local Plan Map.</p> <p>2.4 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on planning for well-designed places¹. PPG sets out more detailed design guidance on processes and tools that can be used through the planning system and how to engage local communities effectively. In relation to landscape considerations, it states that these are key matters for masterplans, design-codes and parameter plans so as to achieve well-designed places.</p>

¹ <https://www.gov.uk/guidance/design>


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			<p>2.5 It is considered that Policy CL7 provides appropriate and proportionate protection for important and valued views in the Borough, consistent with national planning policy and guidance. Policy CL7 has been constituted to ensure that these matters are addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application with a supporting landscape and visual assessment in accordance with the requirements in Strategic Policy EC4.</p> <p>3.0 Implications for Gatwick Green</p> <p>3.1 A Long Distance View Splay crosses the north western half of the proposed Gatwick Green allocation. The overall mastepanning of the Site under Strategic Policy EC4 will have regard to this view splay and any other landscape / visual considerations that arise from more detailed work. There will be a range of landscape and visual considerations taken into account in the design and operation of the proposals for the Site. These will include:</p> <ul style="list-style-type: none"> • A layout and design that respects the interface between the surrounding residences and countryside areas within the North East Crawley Rural Fringe landscape character area. • The inclusion of landscape buffers and open space to address separation of Gatwick Green from Gatwick Airport, Horley and the wider countryside. • The integration of trees, hedgerows and biodiversity into the layout and design and enhance blue/green infrastructure in the context of the Gatwick Woods Biodiversity Opportunity Area. • Minimising the impacts of lighting on neighbouring residences. <p>3.2 The Appendices to GGL's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to landscape / visual matters are addressed in the 2020 Appendices and subject to Addenda / a new report contained at Appendices A – E of Appendix 3 to GGL's representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.</p> <p>3.3 More especially, the Addendum to the Landscape Character and Visual Appraisal confirms that the Site can be developed whilst respecting the various landscape and visual values in and around it, and includes recommendations on appropriate avoidance and mitigation measures. These matters will be addressed at the planning application stage and set out in a Design and Access Statement.</p> <p>4.0 Conclusions</p> <p>4.1 GGL acknowledges the need for the Gatwick Green proposals to address the landscape and visual amenity considerations relating to the Site and referenced in Policy CL7. All feasibility investigations to date indicate that Gatwick Green can be delivered in accordance with these requirements. The masterplan proposals for</p>

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			<p>the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.</p> <p>4.2 It is considered that Policy CL7 provides appropriate and proportionate requirements for addressing landscape and visual matters, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed to incorporate landscaping to provide visual buffers, enhance amenity and ensure the proposals can be accommodated in the wider landscape.</p> <p>Suggested Modifications:</p>
REP/057 (2023)	Universities Superannuation Scheme Ltd (Agent: Deloitte LLP)	CL7	<p>Draft Policy CL7 'Important and Valued Views' identifies that for 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." USS generally supports CBC's commitment to protecting and/or enhancing Important and Valued Views. However, it is essential that Draft Policy CL7 does not overly restrict development. The policy should assess each development on its merits following detailed townscape analysis and assessment of the design to understand how the view will be impacted and what level of development is considered to be appropriate. A proposed rewording of Draft Policy EC2 is provided at Appendix 2.</p> <p>Suggested Modifications: Appendix 2: Draft Policy CL7 'Important and Valued Views' Wording within the Submission Draft Local Plan 2024 – 2040: "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." USS suggested rewording of Draft Policy EC2: "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 Where a proposed development is located within a Long Distance View, this should be considered on its merits following detailed townscape analysis and assessment of the design to understand how the view will be impacted and what level of development is considered to be appropriate."</p> <p>Suggested Modifications:</p>
REP/013 (2023)	The Ifield Society	CL8	<p>I consider the Crawley Local Plan (and Map) to be 'sound', but also consider the Plan would be more sound if my specific proposal of a Local Nature Reserve and Heritage Site- the proposed modification to CL8 (West of Ifield Rural Fringe) – is incorporated within it.</p> <p>I submit the research document "Making the case for a Local Nature Reserve (LNR) and Heritage site on the West of Ifield Rural Fringe" to support my proposal.</p>

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			<p>Suggested Modifications: Proposed modification to CL8: Development Outside the Built-Up Area – West of Ifield Rural Fringe (Page 60) “Proposals which respect this area of locally special rural fringe, the nature conservation and recreation value, its positive relationships with the urban edge, and links to the wider countryside will be encourage, ESPECIALLY THE PROPSAL FOR A LOCAL NATURE RESERVE AND HERITAGE SITE. (see research document Making the case for a Local Nature Reserve and Heritage site....) Making the case for a Local Nature Reserve (LNR) and Heritage Site on the West of Ifield Rural Fringe (Policy CL8)</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;"> <p>MAKING THE CASE FOR A LOCAL NATURE RESERVE (LNR) AND HERITAGE SITE ON THE WEST OF IFIELD RURAL FRINGE [POLICY CL8]</p>  <p>FEBRUARY 2020 [REVISED JUNE 2023] The Ifield Society</p> </div> <div style="text-align: center;"> <p>MAKING THE CASE FOR A LOCAL NATURE RESERVE AND HERITAGE SITE</p> <table border="0"> <tr> <td>MAPS</td> <td>2 - 5</td> </tr> <tr> <td>INTRODUCTION - David Moon</td> <td>6 - 9</td> </tr> <tr> <td>1. WILLOUGHBY FIELDS Local Nature Reserve (LNR)</td> <td>10 - 48</td> </tr> <tr> <td>2. IFIELD BROOK MEADOWS Local Green Space (LGS)</td> <td>49 - 67</td> </tr> <tr> <td>3. SEWBUSH WATER GARDENS AND IFIELD MILLPOND Site of Nature Conservation Importance (SNCI)</td> <td>68 - 151</td> </tr> <tr> <td>4. HERITAGE SITE</td> <td>152 - 162</td> </tr> <tr> <td>CONCLUSION - David Moon</td> <td>163</td> </tr> <tr> <td>APPENDICES</td> <td>164 - 187</td> </tr> </table> <p>COMPILED BY DAVID MOON AND RICHARD W. SYMONDS [IFIELD SOCIETY CO-FOUNDERS]</p> </div> </div>	MAPS	2 - 5	INTRODUCTION - David Moon	6 - 9	1. WILLOUGHBY FIELDS Local Nature Reserve (LNR)	10 - 48	2. IFIELD BROOK MEADOWS Local Green Space (LGS)	49 - 67	3. SEWBUSH WATER GARDENS AND IFIELD MILLPOND Site of Nature Conservation Importance (SNCI)	68 - 151	4. HERITAGE SITE	152 - 162	CONCLUSION - David Moon	163	APPENDICES	164 - 187
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			<div style="text-align: center;"> <h2 data-bbox="786 331 1057 371">INTRODUCTION</h2>  <p data-bbox="817 882 1010 900">Photograph by Robert Stass</p> </div> <p data-bbox="1182 312 1352 336">INTRODUCTION</p> <p data-bbox="1182 368 1503 416">By David Moon – Crawley Community Award Winner 2016</p> <p data-bbox="1182 456 1379 472">"THE DEATH OF RURAL IFFIELD?"</p> <p data-bbox="1182 512 1536 572">The building of ten thousand homes west of Ifield is now being proposed. Three thousand of these are planned for Ifield Golf Course, with no plans for the replacement of this very important local amenity.</p> <p data-bbox="1182 616 1543 699">This development, one feels, has as much to do with the high levels of London house prices, as it is with any Gatwick expansion. Both threaten the peaceful rural nature of this ancient Parish, whose history goes back for at least one thousand years and some of whose wildlife still persists in the remaining pockets of ancient woodland among the quiet fields.</p> <p data-bbox="1182 735 1541 796">All of this gives refreshment to those who love the countryside and value the peace and beauty that it offers, whether this comes from breathing cleaner air or walking the dog, or simply from watching the wide diversity of living creatures in the area.</p> <p data-bbox="1182 831 1536 903">Rural Ifield, to those in the know, contains more than one-third of Britain's longhorned beetle species, some of Red Data Book importance. There is also an abundance of butterflies in variety, some of which are nationally local in their distribution, such as the Brown Hairstreak. Many bird species here are already in</p> <p data-bbox="1603 292 1980 349">decline; these include the Skylark, Grey Partridge, Reed Bunting, Willow Tit, Kingfisher, Tree Sparrow, Little Owl and Nightingale, all of which could once be seen some time during the year in this area, but which are now much scarcer or have gone altogether.</p> <p data-bbox="1603 392 1980 501">A new township on what is Horsham District Council land, with from 30 to 40 thousand more people living in this once-rural area, would place much greater pressure on Crawley facilities and bring with it all the additional needs and problems associated with any new community of that size – more road building, hugely increased volumes of traffic with its noise and air pollution, inevitably more crime and, therefore extra policing.</p> <p data-bbox="1603 544 1980 627">Building has already begun opposite Ifield Golf Course [The Maples – Ed] – and this new estate appears to be creeping northward towards the Ifield Brook Meadows Local Green Space [LGS] that we fought so hard to establish and protect. Discarded shopping trolleys were spotted in Ifield Brook only recently – at the Sept 7th Rumblette.</p> <p data-bbox="1603 671 1980 823">Ten years ago, large numbers of ugly 'Private Land' trespass notices were erected almost overnight across the green areas west of St. Margaret's Church within the ancient Parish of Ifield, including land within the Crawley Borough Council boundary. These notices removed the right to walk along certain field paths used by generations of people (eg witness "The Miller's Trail" – brochure leaflet on request – which dates back to at least the 17th century). Bridges were removed within Ifield Brook Meadows Local Green Space, once giving access to the woodlands along Ifield Brook – "probably the most beautiful short riverbank walk in Sussex".</p> <p data-bbox="1603 863 1980 908">All of this was performed under the potentially-destructive 'umbrella' of the former Homes & Communities Agency (now, Homes England) which, only a few years later seemed to give it</p>

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Chapter 4. Character, Landscape and Development Form

Ref. No.	Respondent	Policy/ Para	Comments
			<p style="text-align: center;">2. IFIELD BROOK MEADOWS Local Green Space [LGS]</p> <p><u>List of flora growing in the proposed housing development in Quaker Rd. Field - as classified in Rev. Kable Martin's 'Genuine British Flora', (revised for classification order and to include common names, from 'The Illustrated Flora of Britain and Northern Europe' by Misses A. Gray & J. S. Wood, 1989). Original list compiled by Barbara Coleman.</u></p> <p><u>A. Dicotyledons</u></p> <ol style="list-style-type: none"> 1. White-flowered Nettle - <i>Urtica dioica</i> 2. History - <i>Urtica dioica</i> - <i>Urtica dioica</i> 3. Common Nettle - <i>Urtica dioica</i> 4. Wood Dock - <i>Rumex crispus</i> 5. Wood Field - <i>Rumex crispus</i> 6. Nettle-leaved Goosefoot - <i>Chenopodium murale</i> 7. Fat Hen - <i>Chenopodium album</i> 8. Common Chickweed - <i>Stellaria media</i> 9. Greater Stitchwort - <i>Stellaria holostea</i> 10. Lesser Stitchwort - <i>Stellaria graminea</i> 11. Red Campion - <i>Silene dioica</i> 12. Wood Anemone - <i>Anemone nemorosa</i> 13. Cream-colored Buttercup - <i>Ranunculus repens</i> 14. Meadow Buttercup - <i>Ranunculus acris</i> 15. Lesser Ox-eye - <i>Ranunculus ficaria</i> 16. Garlic Mustard - <i>Jack-by-the-hedge</i> - <i>Alliaria petiolata</i> 17. Cowslip - <i>Adonis vernalis</i> 18. Shepherd's Purse - <i>Casella bursa-pastoris</i> 19. Charlock - <i>Wild Mustard</i> - <i>Sinapis arvensis</i> 20. Field - <i>Dyer's Rocket</i> - <i>Raphanus sativus</i> 21. Wild Mignonette - <i>Rosa lucida</i> 22. Meadowweet - <i>Millonidula ulmaria</i> 23. Brambles - <i>Rubus fruticosus</i> 24. Dewberry - <i>Rubus caesius</i> 25. Field Rose & others - <i>Rosa arvensis</i> etc. 26. Agrimony - <i>Agrimonia eupatoria</i> 27. Herb Bennet - <i>Geum urbanum</i> 28. Silverweed - <i>Potentilla anserina</i> 29. Tormentil - <i>Potentilla erecta</i> 30. Creeping Cinquefoil - <i>Potentilla reptans</i> 31. Wild Strawberry - <i>Fragaria vesca</i> 32. Turf-top Vetch - <i>Vicia cracca</i> 33. Common Vetch (var) - <i>Vicia sativa</i> subsp. <i>pispa</i> (= <i>V. cracca</i>) <p style="text-align: right;">49/...</p>
			<p><u>List of notable insects observed in the area of Ifield threatened by development, 1981-2000 (compiled by R.R.A.D.J. Moon, with important contributions from the field records of the late James R. Havers)</u></p> <p>N.B. The list represents a relatively small selection from the total number of insect species to be found in this area, which probably runs into thousands.</p> <p><u>Order Odonata (Damselflies & Dragonflies)</u> *known to breed</p> <ol style="list-style-type: none"> *1. Beautiful Demoiselle (<i>Calopteryx viridis</i>) 2. Banded Demoiselle (<i>Calopteryx splendens</i>) 3. Emerald Damselfly (<i>Isotrs spongia</i>) *4. Large Red Damselfly (<i>Pteronarcys mormon</i>) *5. Blue-tailed Damselfly (<i>Ischnura elegans</i>) *6. Azure Damselfly (<i>Coenagrion puella</i>) *7. Common Blue Damselfly (<i>Ethalia caesia</i>) *8. Red-eyed Damselfly (<i>Coenagrion puella</i>) 9. Southern Hawker (<i>Aeshna cyanea</i>) *10. Brown Hawker (<i>Aeshna grandis</i>) *11. Migrant Hawker (<i>Aeshna mixta</i>) *12. Emperor Dragonfly (<i>Anax imperator</i>) *13. Brilliant Emerald (<i>Sinobrylia ruficornis</i>) *14. Broad-bodied Chaser (<i>Libellula depressa</i>) *15. Four-spotted Chaser (<i>Libellula quadrimaculata</i>) *16. Black-tailed Skimmer (<i>Psephenus concoloratus</i>) *17. Buddy Darter (<i>Synsraetia punctata</i>) *18. Common Darter (<i>Synsraetia striolatus</i>) <p><u>Order Orthoptera (Cricket & Grasshopper)</u></p> <ol style="list-style-type: none"> 1. Oak Bush Cricket (<i>Mecanona thebesiana</i>) 2. Great Green Bush Cricket (<i>Pteronarcys viridis</i>) - one record 3. Dark Bush Cricket (<i>Hemiptera crassipes</i>) 4. Rosell's Bush Cricket (<i>Hemiptera roselli</i>) 5. Long-winged Grasshopper (<i>Conocephalus discolor</i>) 6. Speckled Bush Cricket (<i>Leptothorax unicolor</i>) 7. Common Green Grasshopper (<i>Crocotylus viridulus</i>) 8. Lesser Marsh Grasshopper (<i>Chorthippus albomarginatus</i>) 9. Common Field Grasshopper (<i>Chorthippus humilis</i>) 10. Meadow Grasshopper (<i>Chorthippus mollis</i>) <p style="text-align: right;">50/...</p>

Chapter 4. Character, Landscape and Development Form

Ref. No.	Respondent	Policy/ Para	Comments
			<p><u>List of bird species observed 1972-2009 in the area of Ifield threatened by development, and their present status. Compiled by D.J.Moon, with additions from the records of the late James Favers</u></p> <p><u>Key:</u> a/w - autumn/winter visitor b - breeding within the area b e - breeding elsewhere (in Sussex and/or other parts of Britain) f - Feral species i - introduced into Britain by Man; now resident nb - non-breeding in Britain r - resident s/s - spring/summer visitor</p> <ol style="list-style-type: none"> 1. Grey Heron (<i>Ardea cinerea</i>) - r.be. 2. Mute Swan (<i>Oxyanus olor</i>) - r.be. 3. Greylag Goose (<i>Anser anser</i>) - f.be. 4. Canada Goose (<i>Branta canadensis</i>) - i.be. 5. Mandarin Duck (<i>Aix galericulata</i>) - i.b. 6. Mallard (<i>Anas platyrhynchos</i>) - r.b.(more usually be.) 7. Eurasian Sparrowhawk (<i>Accipiter nisus</i>) - r.b.(as above) 8. Common Buzzard (<i>Buteo buteo</i>) - r.b.(increasing in number) 9. Common Kestrel (<i>Falco tinnunculus</i>) - r.b. 10. Eurasian Hobby (<i>Falco subnucius</i>) - s/s.b. 11. Peregrine Falcon (<i>Falco peregrinus</i>) - occasional visitor.be. 12. Grey Partridge (<i>Pardix perdix</i>) - r.b.(now declined) 13. Common Pheasant (<i>Phasianus colchicus</i>) - i.b. 14. Common Moorhen (<i>Gallinula chloropus</i>) - r.b. 15. European Golden Plover (<i>Pluvialis apricaria</i>) - occasional winter visitor.be. (3 flying south over Ifield, 15 Feb 1991; 1 seen c.400 downings in fields adjoining Ifield Brook, 23 Jan 1990-J.M) 16. Northern Lapwing (<i>Vanellus vanellus</i>) - r.b.(declined - now be.) 17. Common Snipe (<i>Gallinago gallinago</i>) - s/w.be. 18. Little Gull (<i>Larus minutus</i>) - rare, normally coastal.nb. (one record - 2 Feb 2008, after sales) 19. Black-headed Gull (<i>Larus ridibundus</i>) - r.be. 20. Herring Gull (<i>Larus argentatus</i>) - r.be. 21. London Pigeon (<i>Columba livia</i>) = domesticated Rock Dove.f.be. 22. Stock Pigeon (<i>Columba oenas</i>) - r.b. 23. Common Wood Pigeon (<i>Columba palumbus</i>) - r.b. 24. Eurasian Collared Dove (<i>Streptopelia decaocto</i>) - r.mainly be. 25. Common Cuckoo (<i>Cuculus canorus</i>) - s/s.b. <p style="text-align: center;">-12- 61/...</p>
			<p><u>List of bird species observed 1972-2009 in areas bounding the area under threat of development; some species have probably occurred within the threatened area and some almost certainly fly over it.</u></p> <p><u>Key:</u> IE - Ifield East IG - " Green IW - " -wood MFW - " Mill Pond North MPS - " " " South (Gosspole Green/Bewbush)</p> <ol style="list-style-type: none"> 1. Little Grebe (<i>Tachybaptus ruficollis</i>) - MPW&S 2. Great Crested Grebe (<i>Podiceps cristatus</i>) - MPW&S 3. Slavonian Grebe (<i>Podiceps auritus</i>) - MPS(rare visitor, for 1 week from 12 Jan.2007) 4. Great Cormorant (<i>Phalacrocorax carbo</i>) - IE,MPW&S 5. Eurasian Wigeon (<i>Anas penelope</i>) - MPS (a small no.of winter records) 6. Gadwall (<i>Anas strepera</i>) - MPS (more frequent winter records during the early 1990s) 7. Eurasian Teal (<i>Anas crecca</i>) - IW (swampy area, 7 March 1984 & 26 Jan.2003); Ifield Pond, 27 Feb.1984 8. Common Coot (<i>Aythya ferina</i>) - MPS (more frequent winter records early in the recording period) 9. Tufted Duck (<i>Aythya fulvicula</i>) - MPS (as for Gadwall & Common Coot) 10. Osprey (<i>Pandion haliaetus</i>) - IE (a brief sighting in March, early 1990s - DJM; James Favers observed a bird flying between Bewbush and Ifield, 2 Nov 2000) 11. Red-legged Partridge (<i>Alectoris rufa</i>) - IE (a bird killed as a vehicle in Warren Drive, 2007) 12. Water Rail (<i>Rallus aquaticus</i>) - MPS (winter records, most notably for 1994 & 2002 - J.M.) 13. Common Coot (<i>Fulica atra</i>) - MFW & S 14. Eurasian Woodcock (<i>Scolopax rusticicola</i>) - IE (17 Feb. & 10 March 1994 - J.M.) 15. Common Sandpiper (<i>Actitis hypoleucos</i>) - MPS (spring passage) 16. New Gull = Common Gull (<i>Larus canus</i>) - IE & IW (Mount Farm) - many records 17. Lesser Black-backed Gull (<i>Larus fuscus</i>) - IE,IG,IW & MFW (many records, usually of single birds) 18. Great Black-backed Gull (<i>Larus marinus</i>) - IE (one bird among winter gull flocks on Ifield common, late 1980s) 19. Ring-billed Gull (<i>Halictus leucostriatus</i>) - IG (2 birds, 5 Nov 1987 - DJM; also a bird at Ifield Pond, 23 Jan 1994-J.M) <p style="text-align: center;">-15- 64/...</p>

**3. BEWBUSH WATER
GARDENS AND IFIELD
MILLPOND
Site of Nature
Conservation Importance
[SNCI]**


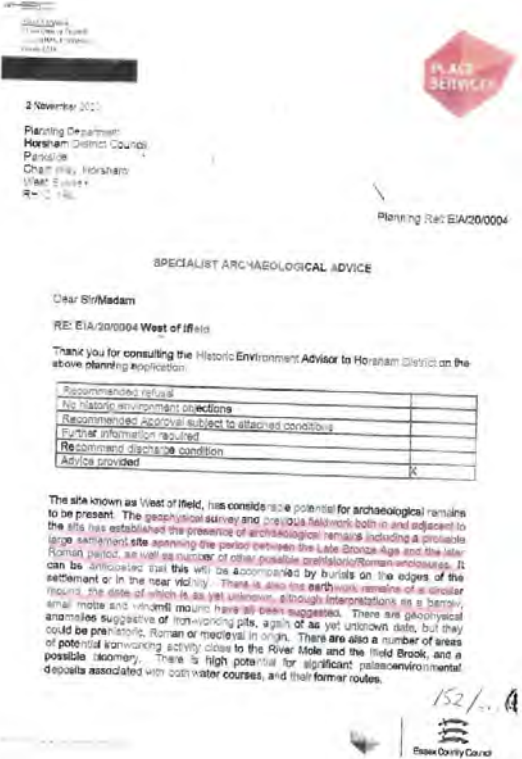
Chapter 4. Character, Landscape and Development Form			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>Wildlife Observations in the environs of Ifield, Faygate & Colgate 1999/2000/2001</p>  <p>Field extracts provided by James R Havers, Recorder, TQ23 Price £5.50</p> <p>Introduction</p> <p>This booklet details the various observations that have been made at locations in the south-west part of Crawley and adjacent strategic gap, during the years 1999, 2000 and 2001. The 'recording area' can be divided into two distinct geological zones roughly in line with where the A264 dual carriageway passes through between Crawley and Horsham.</p> <p>The landscape on the weald clay to the north of this road consists primarily of mixed farmland with a patchwork of hedgerows, small woods and copses, the natural history interest here being somewhat enhanced by the presence of a sizeable landfill site (formerly Bewbush Pond) which over the years has yielded quite an impressive bird list, and also provides optimum conditions for a number of grasshopper species. Other notable wildlife haunts include those on the rural fringes of Ifield such as the old meadows present on the high ground at Hyde Hill and on the floodplain near St. Margaret's Church, and an area of water-logged common land near Oak Tree Farm, Ifieldwood which was once suitable for nightingales, now sadly just a distant memory. Notwithstanding its obvious aesthetic appeal, the 'old-fashioned' countryside to the west of Ifield, with its numerous blackthorn hedges and mature ash, has been recognised as being of some considerable importance for the brown hairstreak butterfly (see cover photo), the western weald holding one of the few large populations of this species in England.</p> <p>To the south of the A264, the geology comprises mainly of sandstone, rising to a height of approximately 145 metres at Colgate. In a more 'natural' state, the landscape here would consist of broad-leaved trees such as beech and birch with areas of gorse and heather. Nowadays, much of the terrain has been planted with commercial timber, and has become infested with rhododendron. However, the mature stands of conifers do attract their own specialised avifauna, in particular the crossbill and firecrest which have been seen with some regularity in Holmbush Forest. One site of particular interest in this part of the recording area is the attractive pond adjacent to Holmbush mansion, which in certain years can hold outstanding numbers of dragonflies.</p> <p>For added variety, a number of localities from within the built-up part of Crawley have been included in the text, for example Ifield Mill Pond & Woldhurstfen Wood at Gosops Green, the latter being of especial interest to the author as it borders on his garden!</p> <p>With all the discussion of further developments in this part of West Sussex over the next few years - effectively destroying or degrading a number of the sites appearing in the main section - it is hoped that this booklet will, at the very least, give the reader some insight into what could be lost if these proposals become a reality.</p> <p>James Havers 19th Jan 2002</p> <p style="text-align: right;">69/... 70/... 95/..</p>





WILDLIFE OBSERVATIONS

in the environs of
Ifield, Faygate and Colgate

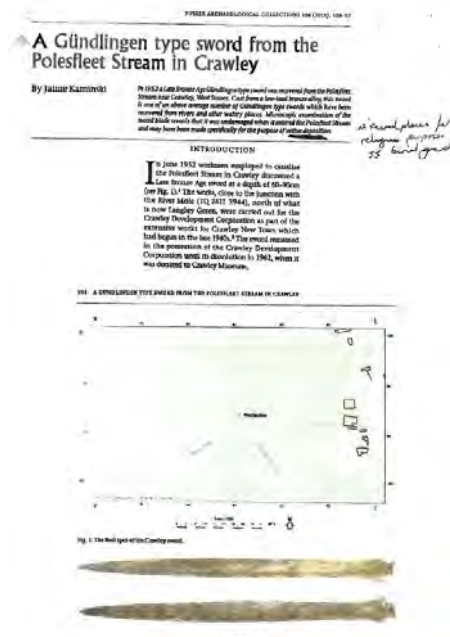

- Field extracts from the notebooks of local wildlife enthusiast James Havers including:
- Records of birds, insects and other fauna for the period 01/01/99-31/12/01
 - Easy-to-read text in "diary" format with site grid references
 - Eighteen quality photographs
 - Available early February 2002 at £5.50

Chapter 4. Character, Landscape and Development Form


Ref. No.	Respondent	Policy/ Para	Comments
			<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;"> <p>WILDLIFE OBSERVATIONS in the Crawley Area</p>  <p>1994</p> <p>Compiled by JAMES R HAVERS</p> </div> <div style="text-align: center;"> <p>HERITAGE SITE</p> <p>[Compiled by Richard W. Symonds Ifield Society Co-Founder]</p> </div> <div style="text-align: right;">  </div> </div>

Chapter 4. Character, Landscape and Development Form			
Ref. No.	Respondent	Policy/ Para	Comments
			 <p>It is therefore recommended that the proposed Cultural Heritage Chapter in the EIA should comprise:</p> <ul style="list-style-type: none"> A desk-based assessment of the proposed development area – this should utilise the information available in the West Sussex Historic Environment Record and historic cartographic and documentary sources. This should include an assessment of both the historic environment sites and the historic landscape setting. A re-assessment should be made of the aerial photographic evidence for the area, including the on-line digital data available on GoogleEarth. This should include rectification of both archaeological features and paleochannels. An assessment should be made of the available LiDAR data for the application site and rectified plots produced of both archaeological and historic landscape features identified. If a geophysical survey is being undertaken it is recommended that a trial area is undertaken on an area of known archaeological deposits to assess its effectiveness prior to the remainder being surveyed. An assessment should be made of the available borehole and BGS data for the site in order to establish the potential for palaeoenvironmental deposits within the valleys of the Mole River and the field Brook. An element of ground-scutting, in the form of trial-trenching, will be required to clarify the results of all of the surveys. The results of the above will inform the development of a mitigation strategy for both preservation <i>in situ</i> and/or preservation by record where this is not possible. <p>If planning permission is granted initially all those areas not previously trenched will require a programme of archaeological trial-trenching at a density of 5% (4% with a further 1% available for refining the results). This will inform the further development of the mitigation strategy.</p> <p>If you have any questions please do not hesitate to contact me.</p> <p>Yours sincerely Mena Medycott MA, MCIA, FSA</p>  <p>Historic England Direct Dial: 0307 973 3833 Our ref: PLAC716062 07 October 2020</p> <p>Dear Sir/Madam Planning</p> <p>EA200004 - LAND WEST OF FIELD, WEST SUSSEX REQUEST FOR EIA SCOPING: MIXED DEVELOPMENT</p> <p>We think it essential that an integrated landscape approach to assessment of heritage assets (both designated and undesignated) is undertaken and translated into the report.</p> <p>The assessment should also take account of the potential impact which associated development activities (such as construction, parking, maintenance, and associated traffic) might have upon perceptions, understanding, and appreciation of the heritage assets in the area.</p> <p>The assessment should also consider the likelihood of alterations to drainage and ground water patterns that might lead to in situ decomposition or destruction of historic ground archaeological remains and deposits, and can also lead to destabilising of buildings and monuments.</p> <p>The Conservation Area, the majority of the Listed Buildings (Grade II), and other built heritage will be a matter for the Local Authority. Impacts on these heritage assets will however, also need to be examined when the heritage baseline is assessed and ES prepared.</p> <p>St Margaret's Church</p> <p>The development has the potential to impact on the Grade I listed St Margaret's Church.</p> <p>We appreciate that the setting of the church is largely focused on the village and the densely vegetated field Meadow area. However, as discussed at the pre-application stage, there are some incidental wider landscape views to the tower from a PRoW to the south-west within the site, above the intervening tree belts.</p> <p>The setting of the church and potential impacts of on its significance will need to be examined in detail within the heritage baseline assessment and the ES chapter.</p> <p>Field Court registered plot</p> <p>The development has the potential to impact on this scheduled monument.</p> <p>Impacts could occur from changes within its setting, and from disturbance of potential currently unexcavated associated non-designated below ground archaeological remains.</p> <p>Understanding the setting of the moated site, and how the scheme would change this (including potential visual changes and disturbance to tranquillity) and how this may</p>  <p>Historic England</p> <p>also additionally expect the project to be creative in how it might offer opportunities for their enhancement, and how the project might deliver public (heritage) benefits.</p> <p>Given the importance of the heritage assets within the area, we would expect to provide further advice in due course on this application.</p> <p>Recommendation</p> <p>We urge you to address the above issues, and recommend that production of an Environmental Statement should continue in accordance with national and local policy guidance, and following your expert conservation advice. If you have any queries about any of the above, or would like to discuss anything further, please contact me for further advice.</p> <p>Yours sincerely,</p> <p>REBECCA LAMBERT Inspector of Ancient Monuments rebecca.lambert@HistoricEngland.gov.uk</p> <p>EA200004 - LAND WEST OF FIELD, WEST SUSSEX REQUEST FOR EIA SCOPING: MIXED DEVELOPMENT</p> <p>List of information on which the above advice is based Request for scoping opinion from Horsham BC dated 22nd September 2020 West of Field EIA Scoping Opinion request [Historic England 22 September 2020]</p>  <p>4TH FLOOR, CANNON BRIDGE HOUSE, 26 DOWGATE HILL, LONDON EC4A 3DF Telephone: 020 7973 3100 HistoricEngland.gov.uk</p> <p>Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organization can be requested for release under the legislation.</p> <p>159/...</p>


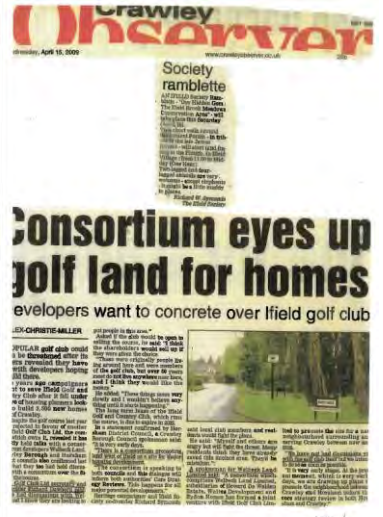
Chapter 4. Character, Landscape and Development Form

Ref. No.	Respondent	Policy/ Para	Comments
			<p style="text-align: right;"><i>July 27 2012 - CBC Hill Council</i></p> <p>Richard Symonds – The Ifield Society Please forgive the following preamble to my question, but it is critically important for context:</p> <p>The question relates to that asked of this Cabinet on July 6 two weeks ago, and another question asked at County Hall last Friday, concerning a possible 3,500-year-old Bell Barrow burial ground to the West of Ifield. My question also specifically relates to 'Specialist Archaeological Advice' by Place Services – advice given by letter two years ago in November 2020, another letter from Historic England on the same date two years ago, and a more recent Heritage Assessment by West Sussex County Council – all concerning SA101 Land West of Ifield.</p> <p>The 'Specialist Archaeological Advice' includes this statement: "There is high potential for significant palaeoenvironmental deposits associated with both water courses [Ifield Brook and the River Mole], and their former routes".</p> <p>This has been confirmed by County Hall's recent Heritage Assessment which identified an Oxbow Lake and five Palaeochannels.</p> <p>Historic England also states – very disturbingly: "We think it essential that an integrated landscape approach to assessment of heritage assets (both designated and undesignated) is undertaken... The assessment should also consider the likelihood of alterations to drainage and ground water patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments".</p> <p>"Subsidence of buildings and monuments" I take to include St Margaret's 13th century Parish Church within the Ifield Village Conservation Area – and Historic England have confirmed this by stating: "The development has the potential to impact on the Grade 1 listed St Margaret's Church."</p> <p>So, finally, my question is: "AS STRONGLY ADVISED BY HISTORIC ENGLAND, HAS AN INTEGRATED LANDSCAPE APPROACH TO ASSESSMENT OF HERITAGE ASSETS BEEN UNDERTAKEN BY THIS COUNCIL?"</p> <p>SUPPLEMENTARY QUESTION</p> <p>"If this Council is genuinely committed to protecting the community's heritage assets and wildlife, why are you proposing to build a Link Road straight through Willoughby Fields Local Nature Reserve?"</p> <div style="display: flex; justify-content: space-between; align-items: flex-start; margin-top: 20px;"> <div style="width: 45%;">  <p><i>is a sword please for religious purposes of burial ground</i></p> </div> <div style="width: 45%;">  <p><i>Is this a 3500 year old Bell Barrow? Burial Ground</i></p> </div> </div> <p style="text-align: center; margin-top: 20px;"><i>160/...</i> <i>161/...</i></p>

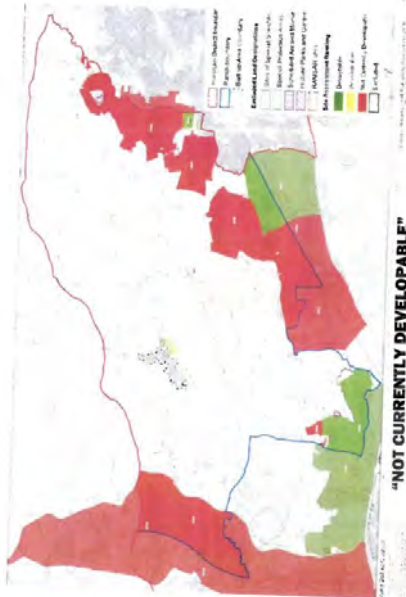



Chapter 4. Character, Landscape and Development Form

Ref. No.	Respondent	Policy/ Para	Comments
			<p>area – and which could sway away from allowing undue housing development to take place next to Crawley.</p> <p>It seems there may be some 'hidden agenda' which would be happy to see another Croydon to the south of the North Downs – with all the problems of a large metropolis thrown in...one more negative contribution to global warming through reduced oxygen, increased CO2 and other forms of air and water pollution.</p> <p>Recent wildlife findings in Rural Ifield give hope that, in spite of...the reduction in numbers of some species, their populations and habitats could recover given time.</p> <p>The often covert operations of government agencies such as Homes England - and their 'associates' – would certainly destroy such hope.</p> <hr/> <p style="text-align: right;">163 (d)</p>
			<p style="text-align: center;">APPENDICES</p> <p>1. "Stenocorus Meridianus' Longhorn Beetle discovered in area of lost hedgewows on West of Ifield Rural Fringe - Ifield Society/Crawley Observer"</p> <p>2. Timeline 2001 - "Mass turnout halts meeting" – Crawley News – December 19 2001 2001 - 3 Alms of Ifield Society [founded by David Moon and Richard W. Symonds] and 'Rambettes' [short walks] launched. 2009 - "Consortium eyes up golf land for homes" – Crawley Observer – April 15 2009 2016 & 2018 - "Not Currently Developable" – Horsham District Council [regarding Land West of Ifield] 2019 - "Homes England plans £3bn garden village" – Estates Gazette – July 29 2019 2019 - Erection of 'Private Land' signage in Ifield Brook Meadows and beyond</p> <p>3. Proposed Ifield Parish Map [twinning the ancient Parishes of Ifield and Rusper]</p> <p style="text-align: right;">164/...</p>
			 <p style="text-align: right;">165/...</p>

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			<div style="display: flex; justify-content: space-between;"> <div style="width: 30%;">  </div> <div style="width: 35%; text-align: center;"> <p>The Ifield Society 2001</p> <p>3 Aims:</p> <ol style="list-style-type: none"> 1. To enjoy and preserve the open character and heritage of Ifield 2. To bring together Ifield's diverse groups and individuals on to a "common platform of agreement" so as to speak together with one, clear powerful voice. 3. To harness and galvanise support so as to ensure West Sussex County Councils Local Structure Plan for Ifield is not adopted in its present form. <p>Do you wish to support the Ifield Society and its Aims? YES No</p> <p>According to County Council rules, if the Ifield Society has the support of 100 or more electors, it can demand a meeting with any Cabinet Member at any time.</p> <p>Would you support the Ifield Society in this endeavour? YES No</p> <p>Name:</p> <p>Address:</p> <p>Contact number:</p> <p>Please return this form to: Richard Symonds, The Ifield Society, 14 Livingston Close, Ifield, Crawley, West Sussex: RH11 0NS. Tel: 01293 535778</p> <p><i>It is a very important document and should be read carefully. It is a very important document and should be read carefully.</i></p> <p>5. Any offers of help would be very much appreciated. Thank you</p> <p style="text-align: right;">172/...</p> </div> <div style="width: 30%;">  </div> </div>

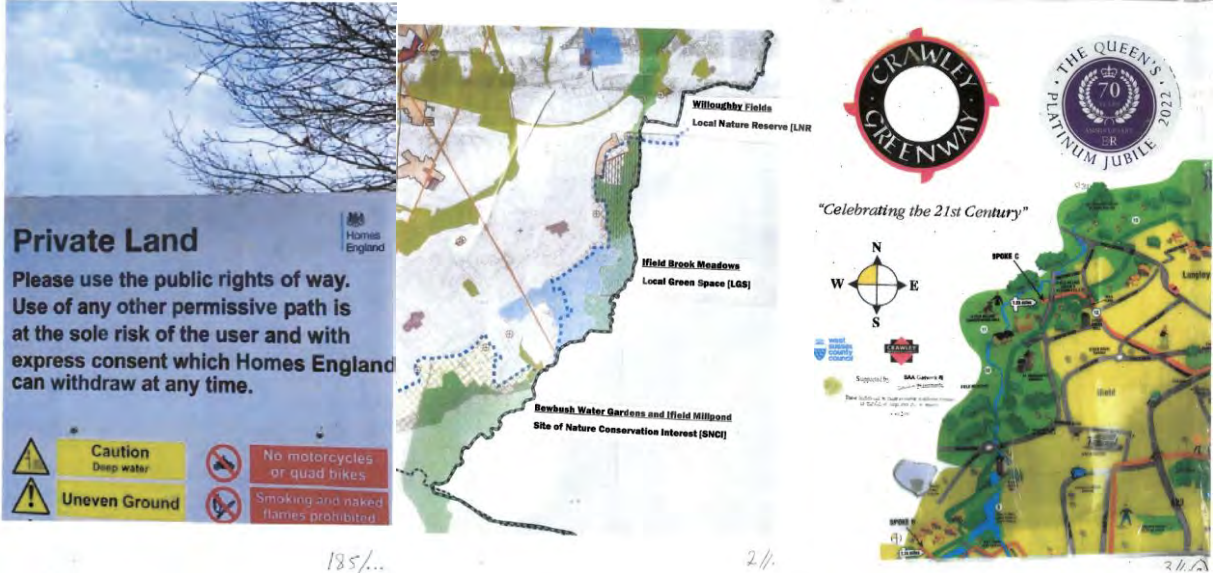
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Ref. No.	Respondent	Policy/ Para	Comments
			<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;">  <p>"NOT CURRENTLY DEVELOPABLE" [Morsham District Council 2016 & 2018]</p> <p>175/...</p> </div> <div style="width: 48%;"> <div style="display: flex;"> <div style="width: 50%;"> <p>8/10/2015, 12:57 PM</p> <p>Homes England plans £3bn Crawley garden village ESO News</p>  <p>Homes England plans £3bn Crawley garden village</p> <p>Emma Rowan 20/07/2019</p>  <p>Homes England has agreed to acquire 140 acres at Peak Golf Club. In a major step to deliver a new 2,000-home village at Crawley, Sussex.</p> <p>It is a sprawling 1,000-acre site, 2,000 homes, 100 shops and 100 acres of green space. The site will create a new village of 2,000 homes, a mix of a mix of 1,500 homes, 100 shops and 100 acres of green space.</p> <p>Homes England will design a master plan for the site to be developed as a public realm, with its own primary school and leisure facilities for local living.</p> <p>The master plan for the site is currently being developed by 3M Architects. It is a major step to deliver a new 2,000-home village at Crawley, Sussex. The site is a sprawling 1,000-acre site, 2,000 homes, 100 shops and 100 acres of green space. The site will create a new village of 2,000 homes, a mix of a mix of 1,500 homes, 100 shops and 100 acres of green space.</p> <p>3M Architects, chief architect and developer of the site, said: "This is a significant new addition to the Crawley area. It will be a new village, with its own primary school and leisure facilities, for a new and vibrant community, and a great place to live. It will be a major step to deliver a new 2,000-home village at Crawley, Sussex. The site is a sprawling 1,000-acre site, 2,000 homes, 100 shops and 100 acres of green space. The site will create a new village of 2,000 homes, a mix of a mix of 1,500 homes, 100 shops and 100 acres of green space."</p> <p>Homes England said: "This is a significant new addition to the Crawley area. It will be a new village, with its own primary school and leisure facilities, for a new and vibrant community, and a great place to live. It will be a major step to deliver a new 2,000-home village at Crawley, Sussex. The site is a sprawling 1,000-acre site, 2,000 homes, 100 shops and 100 acres of green space. The site will create a new village of 2,000 homes, a mix of a mix of 1,500 homes, 100 shops and 100 acres of green space."</p> </div> <div style="width: 50%;"> <p>8/10/2015, 12:57 PM</p> <p>Homes England plans £3bn Crawley garden village ESO News</p>  <p>Homes England acquired the land for the village as part of its broader land ownership from the Government for New Towns in the 1950s. The site currently holds a number of strategic, including the potential expansion of Crawley to the north, the requirement of a large scale to deliver 100,000 new homes, and a new and vibrant community, and a great place to live. It will be a major step to deliver a new 2,000-home village at Crawley, Sussex. The site is a sprawling 1,000-acre site, 2,000 homes, 100 shops and 100 acres of green space. The site will create a new village of 2,000 homes, a mix of a mix of 1,500 homes, 100 shops and 100 acres of green space.</p> <p>Homes England said: "This is a significant new addition to the Crawley area. It will be a new village, with its own primary school and leisure facilities, for a new and vibrant community, and a great place to live. It will be a major step to deliver a new 2,000-home village at Crawley, Sussex. The site is a sprawling 1,000-acre site, 2,000 homes, 100 shops and 100 acres of green space. The site will create a new village of 2,000 homes, a mix of a mix of 1,500 homes, 100 shops and 100 acres of green space."</p> <p>Homes England said: "This is a significant new addition to the Crawley area. It will be a new village, with its own primary school and leisure facilities, for a new and vibrant community, and a great place to live. It will be a major step to deliver a new 2,000-home village at Crawley, Sussex. The site is a sprawling 1,000-acre site, 2,000 homes, 100 shops and 100 acres of green space. The site will create a new village of 2,000 homes, a mix of a mix of 1,500 homes, 100 shops and 100 acres of green space."</p> <p>Related Articles</p> <p>CompassRooft buys 279 homes Southampton BTR scheme</p> <p>Luxuries in partnership from Lord Harewood - the grandaddy of regeneration</p> <p>Places for People gets the nod for 8,000 East Herts homes</p> <p>Liverpool City Council continues negotiations with development director files</p> <p>Liverpool appoints director of city development</p> </div> </div> </div> </div>

176/...

177/...

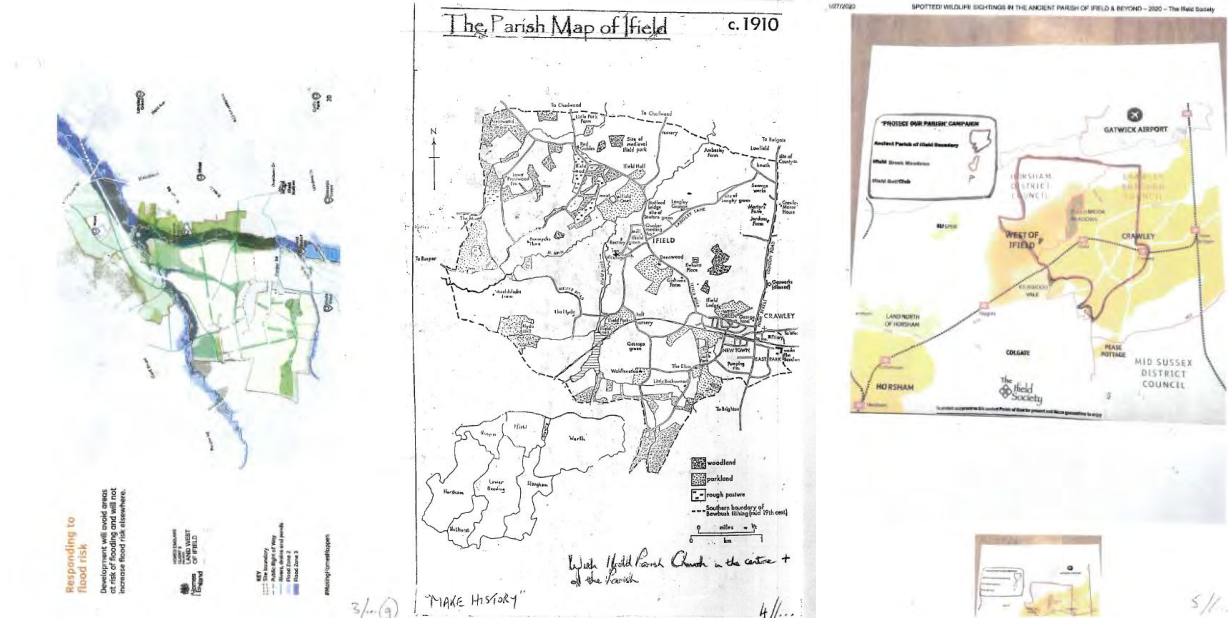
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			 <p>185/...</p> <p>2/1</p> <p>3/1/2</p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<p> "NOT CURRENTLY DEVELOPABLE" [Horsham District Council 2016 & 2018] </p> <p> 31/... (e) </p> <p> 31-46 </p>

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			 <p>The Parish Map of Ifield c.1910</p> <p>SPOTTED WILDLIFE SIGHTINGS IN THE ANCIENT PARISH OF IFIELD & REYNARD - 2020 - The Ifield Society</p> <p>PROTECT OUR PARISH CAMPUS</p> <p>West Ifield Parish Church in the centre + of the parish</p> <p>3/19</p> <p>"MAKE HISTORY"</p> <p>4/11/...</p> <p>5/11/...</p>
REP/013 (2023)	The Ifield Society	CL8	<p>I consider the Crawley Local Plan (and Map) to be 'sound', but also consider the Plan would be more sound if my specific proposal of a Local Nature Reserve and Heritage Site- the proposed modification to CL8 (West of Ifield Rural Fringe) – is incorporated within it.</p> <p>I submit the research document "Making the case for a Local Nature Reserve (LNR) and Heritage site on the West of Ifield Rural Fringe" to support my proposal.</p> <p>Suggested Modifications: Proposed modification to CL8: Development Outside the Built-Up Area – West of Ifield Rural Fringe (Page 60) "Proposals which respect this area of locally special rural fringe, the nature conservation and recreation value, its positive relationships with the urban edge, and links to the wider countryside will be encourage, ESPECIALLY THE PROPSAL FOR A LOCAL NATURE RESERVE AND HERITAGE SITE. (see research document Making the case for a Local Nature Reserve and Heritage site....)</p>
REP/022 (2023)	Sussex Ornithological Society	CL8 CL9	<p>1. The Sussex Ornithological Society (SOS) is the county bird club. We promote the recording, study, conservation and enjoyment of birds in Sussex. We have over 1900 members and a database of seven million bird records in Sussex.</p>

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		2.30 - 2.33	<p>Protection of natural habitats within and south of Crawley: 'Development adjacent to Crawley' paragraphs 2.30 - 2.33 and Policies CL8 and CL9</p> <p>2. We believe that the plan is unsound in (a) proposing to allow or support development in the High Weald Area of Outstanding Natural Beauty (AONB) in the Borough and beyond, contrary to the requirements of the National Planning Policy Framework (NPPF) paragraphs 176 and 177, (b) in failing to have identified and safeguarded ecological networks as required by paragraph 179 (a) of the NPPF; (c) in deferring cross-boundary strategic matters that should have been addressed in the plan, and (d) in not complying with the NPPF requirement for an environmental objective that protects and enhances the natural environment.</p> <p>3. Our principal concern is that the plan is open to allowing or supporting further development that would remove green space and wildlife habitats in the High Weald Area of Outstanding Natural Beauty (AONB), and in undeveloped areas in the south of the Borough in the Tilgate area. An acceptable local plan should make clear that the NPPF requirements in relation to AONBs will be fully respected and that AONBs are an asset, not a constraint. This plan leaves open the possibility of residential or other development anywhere in the AONB and implies that the Council might support such developments delivered by neighbouring Councils. Virtually no land is ruled out: referring to the map on page 26, the text states "This map should not be considered as an indicator of the extent of acceptable development adjacent to Crawley". This wording makes it impossible for those commenting on the plan to understand its scope. The NPPF test of effectiveness requires plans to be "based on effective joint-working on cross-boundary strategic matters that have been dealt with rather than deferred..." and in this respect the plan fails the test of soundness.</p> <p>4. In his letter of 2 March 2020, Richard Cowser of the SOS provided comments under the Regulation 19 consultation process for this plan. Appendix 1 to that letter provided extensive data and evidence in support of our view there should be no further development in the High Weald Area of Outstanding Natural Beauty (AONB).</p> <p>5. This area's birdlife adjacent to Crawley is not dissimilar in its suite of species to the New Forest, which is a Special Protection Area for birds. We cannot imagine that local plans in areas adjacent to the New Forest would make no mention of the important of safeguarding that environment and the ecological network links to the plan area.</p> <p>6. Our letter of 20 March 2020 mentioned Honey-buzzard <i>Pernis apivorus</i>, Britain's rarest regularly breeding bird of prey, for which Sussex holds the largest population of any county in the UK. Pairs are present very close to Crawley and one site is now at serious risk from further residential development in or adjacent to the south side of the Borough. These birds also use the Tilgate woodland and green space, some of which Crawley BC feels should be open to development (Policy CL8, page 60), even though it is the only large remaining green space within the Borough. Lesser Spotted Woodpeckers <i>Dryobates minor</i>, a Schedule 41 Red listed species whose population has fallen by 91% since the 1960s, also occur in Tilgate Forest and adjacent parts of the AONB.</p>

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			<p>These are just two examples of threats to birdlife. Similar considerations apply to the woodland and other green space in the Buchan Forest area, which Policy CL8 appears to earmark for possible development.</p> <p>7. The Crawley Local Plan as now proposed for submission does not sufficiently recognise the Council's duty to safeguard the ecological networks that cross the boundaries of the Borough into adjacent Council areas. Local or off-site mitigation measures are seen in the plan as the remedy for any possible loss of biodiversity, alongside biodiversity net gain measures, but these will not be effective where the goal should be to preserve the integrity of a large, connected ecosystem. In this regard, we consider that the plan is unsound in not complying with the NPPF requirement for an environmental objective that protects and enhances the natural environment.</p> <p>8. Some of the same considerations apply to land west and east of Crawley, including the proposed western relief road. There is no evidence in the plan of work done to identify wildlife-rich habitats, wider ecological networks and wildlife corridors as required by the NPPF paragraph 179 (a). The "area of search" for the proposed western relief road is vague, but it could materially affect one or more Local Wildlife Sites (LWS). As much of the land in question falls under an adjacent Council, we would have expected to see evidence of collaboration with that Council to address these ecological issues within the NPPF duty to cooperate requirements. No such action appears to have been taken and this also renders the plan unsound in term of the NPPF.</p> <p>Suggested Modifications: These concerns would be addressed if (a) the Council were to rule out any further development south of the A264 and M23, whether within the Council boundaries or beyond, including any extension to the Pease Pottage development south of the M23; and any development within the Tilgate area of the Borough where this is currently green space, much needed by the town's residents and by its wildlife; and (b) in relation to paragraph 8 of my submission, building an understanding of habitats and wildlife in these areas and acting on that knowledge.</p>
REP/035 (2023)	Vail Williams on behalf of Ardmore Ltd	CL8	<p>Policy CL8: Development outside the Built-Up Area Boundary Policy CL8 aims to ensure that "<i>Crawley's Compact nature and attractive setting is maintained</i>". It also requires "<i>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</i> "</p> <p>In regard to the Upper Mole Farmlands Rural Fringe, it confirms that "<i>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. Extensions to Manor Royal that would deliver new business land may be suitable in this location. Such development must be of a scale that is appropriate to its countryside location, meeting criteria i-vii of this Policy in its relationship with the surrounding countryside.</i>" (Emphasis added).</p>

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			<p>Throughout our Local Plan Review representations to Regulation 18 and 19 we have continued to confirm that our site A is now consented and implemented and is now sold and therefore the BUAB should be realigned accordingly.</p> <p>We have also submitted that the BUAB is at odds with Policy ST4 for the CWMML road and this should further support a review and realignment of the BUAB. We also contest that ST4 CWMML alone) will fundamentally change the character and setting of the Upper Mole Farmlands Fringe.</p> <p>Suggested Modifications: Policy CL8 states that “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.” We believe that development to extend the Main Employment Area, consistent with EC1 and EC3 can align with CL8, but additional clarity over the ST4 potential CWMML and the development at Jersey Farm now implemented indicate a need to review the BUAB on the proposals map. In its current form we therefore consider that CL8 unsound and unjustified.</p>
REP/050 (2023)	Homes England	CL8	<p>We are responding in our capacity as the landowner / promoter of the Site.</p> <p>Introduction Homes England is an executive non-departmental public body, sponsored by the Department of Levelling Up, Housing and Communities, and the governments’ Housing and Regeneration Agency. Homes England has the aspiration, influence, expertise and resource to drive positive market change. By releasing more land to developers who want to make homes happen, Homes England assists in the delivery of the new homes England needs and helps to improve neighbourhoods and grow communities. Homes England works in collaboration with partners who share our ambition, including local authorities, private developers, housing associations, lenders and infrastructure providers.</p> <p>As set out in our new Strategic Plan 2023-28, our mission is to drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice, the levelling up of communities across England and the creation of places people are proud to call home. A key focus for Homes England is the quality of what is being delivered, including championing environmental sustainability, design and beauty in homes and places that we support to create distinctive places and spaces that are designed for people to use and thrive. We also recognise that mixed-use regeneration to deliver housing alongside employment, retail and leisure space helps to create vibrant and successful places.</p> <p>This includes Homes England delivering a greater amount of employment and commercial space to support the governments levelling up agenda and to support local economies. In this respect, our land holdings at Rowley</p>

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			<p>Farm provides a great opportunity to support Crawley in achieving their Vision within the Draft Crawley Local Plan to improve job opportunities and develop the local economy.</p> <p>Further to the above, our Strategic Plan highlights the importance of working with our local partners with a focus on building and maintaining strong delivery partnerships, to help the council achieve the above Vision, and support the local economy through unlocking the delivery of sustainable development.</p> <p>Previous Representations Homes England has submitted previous representations to the Regulation 18 (2019) and Regulation 19 (2020 & 2021) consultations which relate to the promotion of the Site for employment use across the various B Class and Ec (i.e. the office/professional services floorspace) uses which are compatible and offer a natural extension of Manor Royal.</p> <p>Our representations set out below build upon our previous Regulation 19 response dated 29 June 2021 made in relation to the previous iteration of the Draft Crawley Local Plan which was published for consultation in June 2021. Many of the issues discussed in these representations are still pertinent to the policies discussed below.</p> <p>Purpose of the Representations Pursuant to Regulation 19 of the Town and Country Planning Act (Local Planning) (England) Regulation 2012 these representations are made in respect of the Draft Local Plan to confirm our position in respect of the land interests described within this representation.</p> <p>Documents Reviewed In preparing these representations, the following documents have been reviewed:</p> <ul style="list-style-type: none"> • Crawley Borough Council's (CBC) Draft Local Plan Review 2024 - 2040 (Regulation 19 2023) • Economic Growth Assessment of Crawley (2020) • Crawley Land Availability Assessment (2023) • Gatwick 360 Strategic Economic Plan (2018) <p>Homes England Land Interests. Homes England owns key sites which fall within the Draft Crawley Local Plan area. These landholdings comprise Land West of Ifield, Land at Rowley Farm and Land at Tinsley Lane.</p> <p>These Representations are written only regarding Homes England's interests at Rowley Farm and therefore other landholdings are not described, and separate representations for those sites have been submitted where necessary.</p> <p>Rowley Farm</p>

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			<p>Rowley Farm, located immediately to the south of Gatwick airport and abutting Manor Royal to the east and south, should be considered as a logical extension of the Manor Royal. Please see Annex 1 for a red edge of our ownership.</p> <p>The Site is currently agricultural in use. There are several trees/ areas of hedgerow present and two established woodland areas, one in the north-eastern corner and Rowley Wood in the southwest. Both are of these areas are designated as Ancient Woodland with the latter also a Site of Nature Conservation Importance.</p> <p>The Site contains two listed buildings, namely Rowley Farmhouse (Grade II*) and Crown Post Barn (Grade II). All land except for the immediate areas of adjacent to Crawler's Brook are within Flood Zone 1. The Site can be accessed via either London Road to the north or James Watt Way to the south and there is potential to access the site from Gatwick Road.</p> <p>The Site was previously considered for development as part of the preparation of the Draft Crawley Local Plan (2021), but it was discounted because of "safeguarding for the possible development of an additional runway at Gatwick". Homes England's comments on the safeguarding is set out below. The relationship of the Site to Manor Royal results in it being a logical extension of the existing employment area which is of regional importance. We also understand that Crawley is constrained in terms of employment floorspace, which is evidenced in the Lichfield's Economic Growth Assessment of Crawley¹, which lists between a 10.8 Ha and a 42.2 ha shortfall in employment land space. The total site allocated outside of the Gatwick Green site in the Crawley Land Availability assessment² is 14.49ha deliverable in the next 5 years. It is forecast that Rowley would be capable of delivering around 24.3 ha of land which would support economic development within Crawley.</p> <p>Allocating the Site for employment would allow high quality employment floorspace to come forward and contribute the Crawley Strategic Objectives, namely their demand for sustainable economic growth (EC1). Crawley Policy EC3: Manor Royal details the lack of employment space, a situation wherein the release of this site could contribute to expanding Manor Royal. As set out further below, we give support to the following policy EC3 wording and consider that the Site can support the delivery of this policy to meet the local employment needs.</p> <p><i>"Manor Royal is the principal business location for Crawley and is instrumental to the economic success of the Gatwick Diamond. Its core business function is a key strength that should be retained and enhanced.</i></p> <p><i>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."</i></p>

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			<p>The Site would also strengthen the Gatwick 360 Strategic Economic Plan³ to deliver eight economic priorities, one of which seeks to develop business infrastructure and support. There is already a known demand for new, high-quality business space and the Site would create a logical extension to Manor Royal, providing the ideal opportunity to encourage further economic growth, building on existing infrastructure allowing the cluster of economic activity to grow.</p> <p>Notwithstanding the continued safeguarding for the expansion of Gatwick Airport as set by national aviation policy framework 20134 and Policy GAT2: Safeguarded Land, Homes England confirms that the Site is available for development if, as per the supporting text to Policy GAT2, the national aviation policy were to fall away or a Local Plan Review were to commence to remove or amend Policy GAT2 and support additional employment land in this location. The Site satisfies all the criteria found within Policy EC3, which deals with development within Manor Royal, and as such Homes England considers the Site to be suitable and sustainable for the expansion of Manor Royal subject to the above.</p> <p>The case for the Site's development and inclusion within the Draft Crawley Local Plan as an allocation for employment is compelling. The Site is well connected to hard and soft infrastructure already in place, including nearby public transport links at Gatwick Airport, Crawley Train and Three Bridges Train stations and the soft infrastructure that has been developed through the success of Manor Royal. The Site could also be developed in a phased manner alongside the delivery of Western Multi-Modal Transport Link and support the priorities of Crawley Borough Council found in both the Strategic Economic Plan and Policy EC1 of the Draft Local Plan.</p> <p>Relevant Policies CL8: Development Outside the Built-Up Area In relation to the Site, we are supportive of Policy CL8. We recognise the importance of managing land at the boundary of Crawley and in the Upper Mole Farmland Rural Fringe in particular. This location lies within the proposed safeguarding area for Gatwick Second Runway, just as our sites does. In policy CL8, it is suggested that land could be used for extensions of Manor Royal, just as we propose for the Site.</p> <p>Homes England agrees with supporting text paragraph 4.70 which states "<i>sites immediately adjacent to Manor Royal, which fall outside of the area subject to safeguarding through Policy GAT2, will be considered for minor extensions to the Main Employment Area where these would support the delivery of new business land</i>". We consider the Site to be available to meet this Policy CL8 and the criteria i-vii to enable Rowley Farm to be developed as an extension to Manor Royal, if the safeguarding falls away or changes during the following adoption of the Local Plan.</p> <p>Suggested Modifications:</p>

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REP/050 (2023)	Homes England	CL8	<p>Policy CL8: Development Outside the Built-Up Area This policy deals with development outside of the built-up area. One of the character areas identified is the “<i>West of Ifield Rural Fringe</i>” within which “<i>proposals which respect this area of locally special rural fringe, its nature conservation and recreation value, its positive relationship with the urban edge and links to the wider countryside will be encouraged.</i>”</p> <p>Whilst Homes England generally supports this policy and agrees that any development outside of the built area within the council’s administrative area should be carefully considered, the policy is not effective as it should also recognise the cross boundary discussions with neighbouring authorities on urban extensions to partially help meet Crawley’s unmet needs, in line with the objectives of Policy H1 and Para 12.23.</p> <p>In particular, the policy should recognise the importance of enabling connectivity and opportunity to deliver essential links to potential new sustainable urban extensions outside of the built-up area. Specifically, Homes England maintains that the policy should acknowledge the potential for pedestrian and cycle links that both support the recreational value of the Fringe and allow sustainable links to future development areas.</p> <p>With regard to the policy wording, the use of the word ‘<i>respect</i>’ is unclear and ambiguous in its meaning, and therefore not evident how any decision maker should react to development proposals, contrary to NPPF paragraph 16d. The policy does not give guidance on how development could be considered respectful of Crawley’s “rural fringe”. Homes England suggest instead the usage of ‘have regard to’ (or other similar wording) to avoid ambiguity in this policy.</p> <p>The policy’s supporting text (4.69) appears to direct development outside of Crawley. Given that paragraph 12.23 includes the ‘key considerations’ for any strategic urban extensions, including having respect to the character of Crawley and its urban edges, it is not considered necessary to duplicate this direction in paragraph 4.69. Instead, it is recommended that the supporting text is replaced with a more positively worded commitment of cooperation with adjacent local authorities to seek consensus on capacity for Crawley’s “rural fringes”.</p> <p>Suggested Modifications: Consequently, the following alternative amendments to Policy CL8 ‘West of Ifield Rural Fringe’ are considered necessary to make the Policy sound: <i>Proposals which have regard to this area of locally special rural fringe, its nature conservation and recreation value, its positive relationship with the urban edge will be encouraged while recognising the potential for appropriately planned and designed pedestrian and cycle links between the edge of the existing settlement and any potential new development to the west. Such links must respect the Local Green Space designation which is relevant to the area’s particular qualities of nature, heritage, recreation, landscape, tranquillity, and access to the wider countryside.</i> <i>Beyond the Crawley boundary, the Council will work with neighbouring authorities to assess the capacity of the landscape to accommodate development having regard of relevant evidence and wider objectives for the area.</i></p>

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REP/066 (2023)	Mid Sussex District Council	CL8	<p>Policy CL8: Development Outside the Built-up Area Response from January 2020 continues to apply.</p> <p>Suggested Modifications:</p>
REP/152	Save West of Ifield Campaign	CL8 4.67	<p>Relevant text: 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.</p> <p>SWOI Comment: This policy should be updated given that CBC Full Council on 20th October 2021 passed Motion 2 unanimously as follows: ‘Crawley Borough Council formally re-states its strongest possible opposition to the Homes England proposal to build up to 10,000 new homes to the west of Ifield/Crawley.’ The wording in the Local Plan conflicts with the Full Council policy.</p> <p>Relevant text: 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”.</p> <p>SWOI Comment This policy should be updated to reflect the need to control types of excessively bright and spreading security lights on existing buildings, which can seriously contribute to the light pollution in the area. This problem of light pollution is picked up again in Policy EP6: External Lighting on p 237.</p> <p>Suggested Modifications: The wording in the Local Plan conflicts with the Full Council policy and the Policy CL8 should reflect the full wording from the Full Council motion agreed by all members.</p>
REP/151	Manor Royal BID	CL8	<p>Development Outside the Built-Up Area (Policy CL8) A need to review the countryside policies as they relate to Manor Royal (para 4.70), particularly at the northern boundary (Upper Mole Farmlands Rural Fringe). Given the acceptance of a Western Multi-Modal Transport Link and of the extended safeguarded area, which the Manor Royal BID does not support, the retention of this policy is non-sensical and over-burdensome on developers. Therefore; <i>The Manor BID recommends these countryside policies as they impact Manor Royal be reviewed in favour of a refreshed Manor Royal Design Guide. Given that by accepting the Western Relief Road and the extended safeguarded area the Council has accepted the urbanisation of the northern boundary of Manor Royal, to continue to apply existing countryside polices in the meantime is non-sensical.</i></p> <p>Suggested Modifications:</p>

Chapter 4. Character, Landscape and Development Form			
Ref. No.	Respondent	Policy/ Para	Comments
REP/113 (2023)	Natural England	CL9	<p>Policy CL9: High Weald Area of Outstanding Natural Beauty We are generally supporting of this policy's requirements for relevant proposals to consider impacts on the High Weald Area of Outstanding National Beauty (AONB) in line with the aims of the national planning policy framework (NPPF) (paragraphs 20. 130. 174. 176. 177.) as well as the actions of Goal 10 of the Environmental Improvement Plan 2023 (EIP). Beyond this we would encourage your authority to engage closely with the High Weald AONB unit.</p> <p>Suggested Modifications:</p>

Chapter 5. Design & Development Requirements			
Ref. No.	Respondent	Policy/ Para	Comments
REP/005 (2023)	Thames Water	DD1	<p>Where any proposed development is within 800m of Crawley Sewage Works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.</p> <p>Paragraph 174 of the NPPF, February 2021, sets out that: “Planning policies and decisions should contribute to and enhance the natural and local environment by:e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans...”</p> <p>Paragraph 185 goes on to state: “Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development....”</p> <p>The online PPG states at Paragraph: 005 Reference ID: 34-005-20140306 that: “Plan-making may need to consider: ...whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern)..”</p> <p>The odour impact study would establish whether new resident’s amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer.</p> <p>Suggested Modifications: On this basis, text similar to the following should be incorporated into the Local Plan: <i>“When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided.”</i></p>
REP/033 (2023)	Horsham District Council	DD1	<p>Strategic Policy DD1: Normal Requirements of All New Development We support this policy which is clear in its encouragement of efficient use of land as part of good design.</p> <p>Suggested Modifications:</p>

Chapter 5. Design & Development Requirements			
Ref. No.	Respondent	Policy/ Para	Comments
REP/087 (2023)	Woodland Trust	DD1	<p>Policy DD1: Normal Requirements of All New Development</p> <p>We welcome the policy in DD1 g) that existing trees, green spaces, and hedges should be integrated, protected, and enhanced in new developments, to retain existing trees that contribute positively to the area and allow sufficient space for trees to reach maturity.</p> <p>Trees can play a significant aesthetic role helping integrate new developments into existing ones and creating a local identity, and integrating trees and green spaces into developments early in the design process reduces the risk of tree removal. We recommend the guidance published by the Woodland Trust <i>Residential developments and trees - the importance of trees and green spaces</i> (January 2019).</p> <p>We welcome the commitment in para 5.15 that where trees are unavoidably lost through development, these losses should be mitigated by new planting, as set out in detail in policy DD4.</p> <p>Suggested Modifications:</p>
REP/113 (2023)	Natural England	DD1	<p>Strategic Policy DD1: Normal Requirements of All New Development</p> <p>We support requirement G of this proposal.</p> <p>Specifically we strongly support the requirement to retain trees and other GI or biodiversity assets, in line with the aims of the NPPF (paragraphs 20. 131. 174.) and Goal 1 of the EIP.</p> <p>We also support this policy's references to policies DD4 and GI3 (to which our specific comments are provided below) which should ensure that these requirements are clear.</p> <p>Suggested Modifications:</p>
REP/166 (<i>check 2020 – REP/059 and 2021 reps</i>)	Surrey County Council	DD1 H3c H3e	<p>SCC also welcome the requirement, as set out in policies DD1, H3c and H3e, for waste and recycling storage to be designed into new housing development schemes from the start. However, we note that a requirement for the sustainable management of construction, demolition, and excavation waste is not included within these policies, as suggested in our previous comments dated 2 March 2020, and in accordance with West Sussex Waste Local Plan 2014, Policy W23: 'Waste Management within Development'</p> <p>Suggested Modifications:</p>
REP/131 (2023)	SMB Town Planning on behalf of Oxford Match Ltd	DD3	<p>We welcome the fact that Policy DD3 reflects Central Government's nationally described space standards for new dwellings to have a minimum floor to ceiling height of the main living space of 2.3m for at least 75% of the Gross Internal Area. However, whilst we are concerned that criteria (iv) of the Policy states that the with minimum clear floor to ceiling height of 2.7m is the aim for 3-person 2-bedroom units and above, there is flexibility for a lower height "<i>where it suits the proportions of a narrower unit</i>".</p> <p>Suggested Modifications:</p> <p>This should be redrafted to state "<i>where the characteristics of the site determine otherwise</i>".</p>

Chapter 5. Design & Development Requirements			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>Furthermore, criteria (v) of Policy DD3 requires private outdoor open space (2.5m deep by 4m wide = 10sqm) to be associated with moderate and high-density residential development. This is potentially too large for town centre schemes, particularly flats and the Policy should be redrafted to reflect this as follows: <i>“Usable private outdoor space, at least 2.5m in depth x 4m wide, and accessed directly from main living areas or kitchen. In town centre residential schemes, the minimum acceptable depth for private outdoor amenity space is 1.5m with the minimum area being 5sqm for 1 and 2 person flats plus an extra 1sqm each additional occupant.”</i></p> <p>Policy DD3 as drafted will not make the most efficient use of deliverable land, particularly constrained town centre sites. The Policy as drafted could undermine and conflict with Policy CL2 (principles of good urban design) and CL3 (using land more efficiently and sustainably), as well as, more importantly, those policies seeking further residential development in the town centre to meet the Council’s identified housing needs.</p> <p>We trust that these comments will be taken on board by the Council and the Inspector appointed to hold the Examination in Public in due course.</p>
REP/133 (2023)	The Planning Bureau	DD3	<p><u>Policy DD3 Standards for New dwellings (including dwellings)</u> In our 2021 representation we expressed’ concern ‘that the Council has failed to properly consider the cumulative impact of what it expects new development to achieve, and if it is feasible, or indeed, credible’ and recommended that ‘That the cumulative impact of the design and policy requirement are considered in conjunction with the Council’s stated ambitions for development, notably density’. Given the policy wording in the latest iteration of the Crawley Local Plan we remain of the view that the Council has not assessed this cumulative impact correctly. Instead, the Council should rely on the Nationally Described Space Standards (NDSS) as otherwise the costs involved in designing specific houses may deem sites unviable. In addition the policy also repeats elements of the NDSS. There is no need to repeat government policy within DD3.</p> <p>Suggested Modifications: The policy should be been reconsidered in relation to the current Building Regulations, feasibility and viability. Once reconsidered, we recommend that policy DD3 is deleted and instead the Council rely on the NDSS.</p>
REP/005 (2023)	Thames Water	DD4 Para 5.37 & 5.44	<p>We support the reference to taking account of existing sewerage and water infrastructure when planting trees. Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to the public sewerage system and water supply infrastructure. In order for the public sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of the sewers or water pipes.</p> <p>Suggested Modifications:</p>
REP/087 (2023)	Woodland Trust	DD4	<p>Policy DD4: Tree Replacement Standards We welcome the clear policy in DD1 in support of tree retention, with removal and replacement as a last resort. We strongly welcome the proposed ratio of tree replacement in policy DD4, which reflects the Woodland Trust guidance Local Authority Tree Strategies (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to</p>

Chapter 5. Design & Development Requirements			
Ref. No.	Respondent	Policy/ Para	Comments
			8:1 for the largest trees. We strongly welcome the guidance in para 5.37 that where possible, UK sourced and grown tree stock should be used to support biodiversity and resilience. Suggested Modifications:
REP/113 (2023)	Natural England	DD4	Strategic Policy DD4: Tree Replacement Standards We support this policy's requirements for tree retention and replacement in line with the aims of the NPPF (paragraphs 131. 174.) and various commitments and actions of the EIP relating to Urban tree provision, specifically point 3 of goal 1. Suggested Modifications:
REP/133 (2023)	The Planning Bureau	DD4	Strategic Policy DD4: Tree Replacement Standards The policy does not appear to have been amended in light of our original objections. Suggested Modifications:
REP/056 (2023)	Gatwick Airport Limited	DD5	DD5: Aerodrome Safeguarding 49. We supported the inclusion of Policy DD5 (previously Policy DD6 in the 2020 Regulation 19 DCLP) but suggested some minor revisions to the policy and supporting text. We note that the policy has been amended to simplify its application to development proposals which cannot be satisfactorily mitigated. We support this change. Suggested Modifications: 50. We also have comments on the supporting text at paragraphs 5.38 – 5.47 inclusive as follows to ensure their technical accuracy: <ul style="list-style-type: none"> 5.38 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 safeguarding of people living and working nearby. Please amend to read as follows: '.....and passengers during take-off, landing and whilst manoeuvring on the ground and flying in the vicinity of the airport.....' 5.39 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 developments or construction equipment that might be used (such as cranes) which could create a potential risk to the aerodrome through impacts on radar or building induced turbulence. It also considers the potential risk to aviation created by large landscaping schemes, lighting designs and new water bodies which could attract birds hazardous to aviation.

Chapter 5. Design & Development Requirements			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>Please amend '..... impacts on radar.....' to say '..... impacts on CNS (Communication, Navigation & Surveillance) equipment and Instrument Flight Procedures (IFPs)</p> <ul style="list-style-type: none"> 5.41 Gatwick Airport is an EASA certified aerodrome. Therefore, the Council is required to consult GAL on all planning applications where aerodrome safeguarding applies. The safeguarded area is neither the responsibility nor the proposal of the local planning authority. <p>Please remove the reference to EASA and replace with the following, 'Gatwick Airport is a CAA (Civil Aviation Authority) certified aerodrome'.</p> <ul style="list-style-type: none"> 5.42 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. Evidence suggests that, in general terms, the guidance in Planning circular 01/2003 is not being applied consistently by local planning authorities, and that for clarity, local plans with an officially safeguarded aerodrome should include a policy. <p>Please remove the reference to 'EASA' and replace with '..... & CAA (Civil Aviation Authority).....'.</p> <ul style="list-style-type: none"> 5.44 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 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 operations of the aerodrome. <p>Please remove 'Navigational Aids' and replace with ' CNS (Communication, Navigation & Surveillance) equipment and Instrument Flight Procedures (IFPs)'.</p> <ul style="list-style-type: none"> 5.47 Developers should refer to the Local List and also consult with the Gatwick Airport via 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/policycampaigns/operations-safety . <p>Please add the following for general awareness, CAST (Combined Aerodrome Safeguarding Team) at Combined Aerodrome Safeguarding Team Civil Aviation Authority (caa.co.uk)</p> <ul style="list-style-type: none"> Policy EC4: Strategic Employment Location - Without prejudice to our comments on this policy above, we note that point (p) states that: <i>'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'</i>. <p>If this policy is not deleted, this criterion should be cross referenced to Safeguarding Policy DD5 for completeness.</p>

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Ref. No.	Respondent	Policy/ Para	Comments
REP/056 (2023)	Gatwick Airport Limited	DD6	DD6: Advertisements 51. We continue our support for this policy (previously Policy DD7 in the 2020 Regulation 19 DCLP), for reasons set out in paragraph 8.1 of our representations on the 2020 Regulation 19 DCLP. Suggested Modifications:

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Ref. No.	Respondent	Policy/ Para	Comments
REP/061 (2023)	Historic England	Local Plan Heritage Chapter	<p>As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.</p> <p>Historic England commented on matters relating to the historic environment and heritage assets within the draft Local Plan in our letter of 27 February 2020, and we are content that the objective of the National Planning Policy Framework to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment (NPPF, Paragraphs 185) has been achieved. We are also pleased to restate our view that, with the revisions included since our last letter, the draft Plan contains strategic policies to deliver the conservation and enhancement of the historic environment in accordance with NPPF Paragraph 20d. these points were confirmed in our letter of 29 April 2021 in relation to the Regulation 19 consultation at the time.</p> <p>We previously requested assurance that an up-to-date evidence base existed for the historic environment elements of the Crawley Local Plan has been prepared. In this respect, we note the publication of the Crawley Heritage Assets Review Overarching Document (January 2021) which updates a number of earlier documents.</p> <p>These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.</p> <p>Suggested Modifications:</p>
REP/055 (2023)	Gatwick Green (Wilky)	HA1	<p>1.0 Introduction</p> <p>1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to Policy HA1 Heritage Assets in the Draft Crawley Borough Local Plan, 2023 (DCBLP).</p> <p>1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation notes that Policy HA1 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2021) and the Planning Practice Guidance (PPG). It also confirms that Gatwick</p>

Chapter 6. Heritage			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy HA1.</p> <p>2.0 Policy HA1 – intent of policy and compliance Intention of the policy</p> <p>2.1 The purpose of Policy HA1 is to identify the list of designated and non-designated heritage assets, and set out the key considerations for any development that may affect them. The core guidance is that the key features or significance of heritage assets are conserved and enhanced as a result of development. Great weight is given to the conservation of designated heritage assets pursuant to the statutory requirements of the Listed Building Act 1990; harm to, or the loss of, their significance will require justification in accordance with the importance of the asset and the degree of loss or harm, in line with local and national policy.</p> <p>2.2 Separate guidance is set out on the approach to addressing harm to non-designated heritage assets, taking account of the scale of harm and the asset’s significance, including any harm to an asset’s setting. Further guidance is provided on the scope of, and matters to be addressed in Heritage Impacts Assessments required at the planning application stage.</p> <p>National planning policy and guidance</p> <p>2.3 Chapter 16 of the NPPF sets out how planning policy should provide a positive strategy for the conservation and enjoyment of the historic environment and how development affecting heritage assets should be assessed. In relation to designated assets, the policy guidance places much emphasis on determining if harm represents a total loss, or is substantial or less than substantial, with guidance on how to decide on the impacts of development proposals. In relation to proposals that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. The policy guidance is broadly reflected in the wording of Policy HA1.</p> <p>2.4 The NPPF is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on the heritage environment. The PPG sets out more detailed guidance on the historic environment, including the approach to plan-making and guidance on decision-making, including the meaning of significance of an asset.</p> <p>2.5 It is considered that Policy HA1 provides appropriate and proportionate protection for heritage assets in the Borough, consistent with national planning policy and guidance. Policy HA1 has been designed to ensure that these matters are addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application with a supporting Heritage Impact Assessment in accordance with the requirements in Strategic Policy EC4.</p> <p>3.0 Implications for Gatwick Green</p> <p>3.1 Based on the Council’s review in 2020 of its heritage assets, there are a number of Listed and Locally Listed Buildings near the boundaries of the Gatwick Green allocation, but no Conservation Areas would be affected.</p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>The overall masterplanning of the Site under Strategic Policy EC4 will need to have regard to these assets and any other heritage features that arise from more detailed work. There will therefore be a range of heritage considerations taken into account in the design and operation of the proposals for the Site. These will include respecting the setting of these Listed Buildings and Locally Listed Buildings and conserving, through appropriate means, any archaeology within the Site.</p> <p>3.2 The Appendices to GGL's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to heritage matters are addressed in the 2020 Appendices and subject to Addenda / a new report contained at Appendices A - E of Appendix 3 to GGL's representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.</p> <p>3.3 The Addendum to the Heritage Constraints Appraisal confirms that the Site can be developed whilst respecting the various heritage assets adjacent to the Site, and includes recommendations on appropriate avoidance and mitigation measures. These matters will be addressed at the planning application stage and set out in a Heritage Impact Assessment and a Design and Access Statement.</p> <p>4.0 Conclusions</p> <p>4.1 GGL acknowledges the need for the Gatwick Green proposals to address the heritage considerations relating to the Site and referenced in Policy HA1. All feasibility investigations to date indicate that Gatwick Green can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.</p> <p>4.2 It is considered that Policy HA1 provides appropriate and proportionate requirements for addressing heritage and matters, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed in a way so as to avoid or mitigate any harmful impacts on the setting of the heritage assets in the area.</p> <p>Suggested Modifications:</p>
REP/152	Save West of Ifield Campaign	HA1 Local Plan Map	<p>SWOI comment</p> <p>The list of designated and non-designated assets in Strategic Policy H1 fails to mention village greens. Ifield Village Green is the only registered village green in Crawley. It is contained within the Ifield Village Conservation Area. It also does not appear on the interactive map, although other designated and undesignated assets (i.e. buildings and monuments) do.</p> <p>Suggested Modifications:</p>

Chapter 6. Heritage			
Ref. No.	Respondent	Policy/ Para	Comments
REP/055 (2023)	Gatwick Green (Wilky)	HA4	<p>1.0 Introduction</p> <p>1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to Policy HA5 Locally Listed Buildings in the Draft Crawley Borough Local Plan, 2023 (DCBLP).</p> <p>1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) (the Site) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation notes that Policy HA4 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2021) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy HA4.</p> <p>2.0 Policy HA4 – intent of policy and compliance</p> <p>Intention of the policy</p> <p>2.1 The purpose of Policy HA4 is to ensure that any proposed works to Listed Buildings must preserve or enhance the design and character of the Listed Building and have regard to its historic and architectural significance. This extends to the Listed Building’s setting and key features. The policy goes on to state that any harm to, or loss of, the significance of a Listed Building will need convincing justification in line with national policy – this means that public and substantial benefits will be required to outweigh any harm or loss.</p> <p>National planning policy and guidance</p> <p>2.2 Chapter 16 of the NPPF sets out how planning policy should provide a positive strategy for the conservation and enjoyment of the historic environment and how development affecting heritage assets should be assessed. Proposals that would directly or indirectly cause harm to, or loss of, the significance of a designated heritage asset would require clear and convincing justification – harm to, or loss of, grade II Listed Buildings should be exceptions, and to grade I or II*, wholly exceptional. The policy guidance is broadly reflected in the wording of Policy HA4.</p> <p>2.3 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on the heritage environment. The PPG sets out more detailed guidance on the historic environment, including the</p>

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			<p>approach to plan-making and guidance on decision-making, including that Listed Buildings are identified heritage assets of significance.</p> <p>2.4 It is considered that Policy HA4 sets out an appropriate basis for assessing any proposals that could directly or indirectly affect Listed Buildings in the Borough, consistent with national planning policy and guidance. Policy HA4 has been designed to ensure that these matters are addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application with a supporting Heritage Impact Assessment in accordance with the requirements in Strategic Policy EC4 and Policy HA4.</p> <p>3.0 Implications for Gatwick Green</p> <p>3.1 Based on the Council's review in 2020 of its heritage assets, there are a number of Listed Buildings near the boundaries of the Gatwick Green allocation. The overall masterplanning of the Site under Strategic Policy EC4 will need to have regard to these assets and any other heritage features that arise from more detailed work. There will therefore be a range of heritage considerations taken into account in the design and operation of the proposals for the Site. These will include respecting the setting of these Listed Buildings near the Site.</p> <p>3.2 The Appendices to GGL's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to heritage matters are addressed in the 2020 Appendices and subject to Addenda / a new report contained at Appendices A - E of Appendix 3 to GGL's representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.</p> <p>3.3 More especially, the Addendum to the Heritage Constraints Appraisal confirms that the Site can be developed whilst respecting the various heritage assets adjacent to the Site, and includes recommendations on appropriate avoidance and mitigation measures. These matters will be addressed at the planning application stage and set out in a Heritage Impact Assessment and a Design and Access Statement.</p> <p>4.0 Conclusions</p> <p>4.1 GGL acknowledges the need for the Gatwick Green proposals to address the statutory Listed Buildings near the Site in accordance with Policy HA4. All feasibility investigations to date indicate that Gatwick Green can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.</p> <p>4.2 It is considered that Policy HA4 provides appropriate and proportionate requirements for addressing heritage and matters, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy</p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>EC4 will be designed in a way so as to avoid or mitigate any harmful impacts on the setting of the statutory heritage assets in the area.</p> <p>Suggested Modifications:</p>
REP/055 (2023)	Gatwick Green (Wilky)	HA5	<p>1.0 Introduction</p> <p>1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to Policy HA5 Locally Listed Buildings in the Draft Crawley Borough Local Plan, 2023 (DCBLP).</p> <p>1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) (the Site) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation notes that Policy HA5 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2021) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy HA5.</p> <p>2.0 Policy HA5 – intent of policy and compliance</p> <p>Intention of the policy</p> <p>2.1 The purpose of Policy HA5 is to ensure that development seeks to retain any Locally Listed Buildings, including maintaining features of interest and preserving the character and setting of the building. Development proposals must demonstrate that they take account of the heritage significance of the building and its setting in relation to a number of defined heritage attributes.</p> <p>National planning policy and guidance</p> <p>2.2 Chapter 16 of the NPPF sets out how planning policy should provide a positive strategy for the conservation and enjoyment of the historic environment and how development affecting heritage assets should be assessed. In relation to proposals that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. The policy guidance is broadly reflected in the wording of Policy HA5.</p>

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			<p>2.3 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on the heritage environment. The PPG sets out more detailed guidance on the historic environment, including the approach to plan-making and guidance on decision-making, including the meaning of significance of an asset.</p> <p>2.4 It is considered that Policy HA5 provides appropriate and proportionate protection for non-designated heritage assets in the Borough, consistent with national planning policy and guidance. Policy HA5 has been designed to ensure that these matters are addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application with a supporting Heritage Impact Assessment in accordance with the requirements in Strategic Policy EC4.</p> <p>3.0 Implications for Gatwick Green</p> <p>3.1 Based on the Council's review in 2020 of its heritage assets, there are a number of Locally Listed Buildings near the boundaries of the Gatwick Green allocation. The overall masterplanning of the Site under Strategic Policy EC4 will need to have regard to these assets and any other heritage features that arise from more detailed work. There will therefore be a range of heritage considerations taken into account in the design and operation of the proposals for the Site. These will include respecting the setting of these Locally Listed Buildings near the Site.</p> <p>3.2 The Appendices to GGL's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to heritage matters are addressed in the 2020 Appendices and subject to Addenda / a new report contained at Appendices A – E of Appendix 3 to GGL's representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.</p> <p>3.3 More especially, the Addendum to the Heritage Constraints Appraisal confirms that the Site can be developed whilst respecting the various heritage assets adjacent to the Site, and includes recommendations on appropriate avoidance and mitigation measures. These matters will be addressed at the planning application stage and set out in a Heritage Impact Assessment and a Design and Access Statement.</p> <p>4.0 Conclusions</p> <p>4.1 GGL acknowledges the need for the Gatwick Green proposals to address the non-designated heritage considerations relating to the Site and referenced in Policy HA5. All feasibility investigations to date indicate that Gatwick Green can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.</p>

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			<p>4.2 It is considered that Policy HA5 provides appropriate and proportionate requirements for addressing heritage and matters, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed in a way so as to avoid or mitigate any harmful impacts on the setting of the non-designated heritage assets in the area.</p> <p>Suggested Modifications:</p>
REP/163	Vail Williams on behalf of Chichester College Group	HA5	<p>Policy HA5: Local Listed Buildings & Place Services Report Dec 2020 Evidence Base As per our previous representations to the heritage assessments and consultation, we contest that the supporting evidence base document by Place Services Dec 2020 is sound and robust.</p> <p>Page 176 of the report assesses the “<i>entrance to Tower Building</i>” and concludes that it should be “<i>considered for local listing inclusion</i>”. In addition, on page 178 the assessment also highlights “<i>a 4-storey building</i>” in the centre of the site as also “<i>considered for local listing inclusion</i>”.</p> <p>Our clients have actively engaged with CBC and made objections to this listing and overall evidence base document previously, which does not appear to have been amended, despite additional information being submitted. The additional information provided to the council, was regarding the physical state of disrepair of these buildings, and the Masterplan indicates that both buildings are no longer fit for purpose and for comprehensive development, as supported by Policy TC3 and H2, these would need to be removed.</p> <p>We therefore continue to object to the evidence base and the resultant policy HA5.</p> <p>Given the state of the buildings, and the agreed and adopted Masterplan from June 2019, the Council have already endorsed the removal of these buildings, and this is therefore inconsistent with evidence base documents.</p> <p>With regard to the wording of Policy HA5: Locally Listed Buildings confirms that “<i>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</i>”.</p> <p>We have stated that we do not believe these 2 buildings have any significance in regard to “<i>Aesthetic/Architectural Value; Historic Value; Social/communal Value; Landmark/Townscape Value; and Archaeological Interest</i>”.</p> <p>We contest that if Policy HA5 is found sound, despite the approved Master plan for the site, and our evidence submitted regarding the poor state of the buildings, that any subsequent planning application would only allow “<i>the demolition or partial demolition of a Locally Listed Building ...in exceptional circumstances if the development proposals a) reflect or retain the key features of the original building;</i>”. We therefore find the evidence base and policy H5 in its current form unsound.</p>

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			<p>We are grateful for the opportunity to comment as part of this Regulation 19 Local Plan but suggest that the evidence base underpinning Policy H5 is unjustified, not robust, and therefore H5 is unsound.</p> <p>Please note we wish to participate in proceedings and look forward to hearing from CBC regarding formal submission to PINS.</p> <p>Suggested Modifications:</p>
REP/167	Muller Property Group (Agent: Walsingha m Planning)	HA5	<p>Policy HA5: Locally Listed Buildings</p> <p>The proposed wording states:</p> <p>All development will seek to secure the retention of Locally Listed Buildings.</p> <p>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:</p> <ul style="list-style-type: none"> 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. <p>Proposals seeking the demolition or partial demolition of a Locally Listed Building may be acceptable in exceptional circumstances if the development proposals:</p> <ul style="list-style-type: none"> 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. <p>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.</p> <p>The wording of the Policy is at odds with the National Planning Policy Framework, and goes far beyond what is required of a policy concerning locally listed buildings. Locally listed buildings are non-designated heritage assets which are addressed at paragraph 203 of the NPPF. This states that "the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing up</p>

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			<p>applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.</p> <p>The threshold and tests for acceptable development involving non-designated heritage assets as proposed by draft Policy HA5 is what is expected of works affecting listed buildings, not locally listed buildings. There is already statutory protection for all grades of listed buildings, and a building not meeting the criteria for full listing should not be subject to the same protection as listed buildings.</p> <p>The proposed wording is therefore not consistent with national policy, and the level of protection afforded to locally listed buildings is not justified.</p> <p>Many of the criteria set out above for development affecting locally listed buildings could easily be interpreted as being inappropriate, it offers significant (if not total) scope to object to a development affecting a locally listed building for highly subjective reasons. It is a policy that is not fit for purpose and is unsound in its wording, and represents a significant overstep on what a policy for locally listed building should be.</p> <p>Clearly, 1066 Balcombe Road is not statutorily listed and therefore should not be subject to the same policy requirements as a listed building.</p> <p>Furthermore, we consider the approach to designating locally listed buildings unsound. We have previously made representations to the Council in respect of the proposed local listing of 1066 Balcombe Road, however we have not formally heard from the Council and there has been no opportunity for any further dialogue. It is unclear what the consultation or selection process is, it is far from transparent, however the committee report for the refused application alluded to the potential local listing of the building in the future.</p> <p>The process is fundamentally flawed and unsound for this reason.</p> <p>The draft wording of Policy HA5 is therefore unsound. The reach of the Policy is not justified, and the wording of the policy is not consistent with national policy. The process by which buildings are selected for inclusion on a local list is not positively prepared.</p> <p>Suggested Modifications:</p>

Chapter 7. Open Space, Sport & Recreation			
Ref. No.	Respondent	Policy/ Para	Comments
REP/152	Save West of Ifield Campaign	Chapter 7	<p>Save West of Ifield believe the policies set out in this chapter to be sound as they apply to Crawley itself, but would like to draw attention to the impacts on Crawley, and Crawley residents, should Horsham District Council approve Homes England's plans for the 10,000 house West of Ifield development.</p> <p>1. Ifield Golf Course. Should the West of Ifield development go ahead Ifield Golf Course will be closed and built on in Phase 1 of the plans.</p> <p>Whilst the course is strictly in Horsham land, it sits within Ifield and is widely used by residents of Crawley Borough. See below extract from Horsham District Council's Golf Supply and demand assessment December 2022. https://www.horsham.gov.uk/data/assets/pdf_file/0017/121751/Golf-Supply-and-Demand-Assesment-December-2022.pdf</p> <p>2.130 Ifield Golf & Country Club (48,731 people) has the highest number of people considered most likely to travel to it (based on travel distance only) when compared to the other facilities followed by Rookwood Golf Course (38,721 people). For Ifield Golf & Country Club, it actually has a minimal catchment within Horsham District, with the majority of its area covering Crawley.</p> <p>The course is not surplus to requirements. Horsham District Council's Golf Supply and Demand assessment also states within its conclusion, section 3.2: 'Supply is currently deemed to be sufficient to meet demand; however, it is also clear that each facility is meeting a need due to current membership and usage levels. Potential future demand provides further evidence that each existing facility is required. It is unlikely that any loss of provision could be supported without appropriate mitigation being secured due to capacity pressures that would be created, despite the development aspirations that are in place.</p> <p>Homes England have no plans to build a replacement course (ref: Crawley Local Plan Policy OS1)</p> <p>The loss of this facility would therefore have a detrimental effect on Crawley residents in terms of their physical and mental health, especially those residents that are older, or less able to play other types of sport.</p> <p>The course is also identified as part of the Ruser Ridge Biodiversity opportunity area, and borders Hyde Hill Woods, ancient woodland designated as Local Wildlife Space.</p> <p>Therefore, should HDC allocate West of Ifield for development within its local plan, and /or a planning application be proposed, Save West of Ifield would deem assessments as detailed in Crawley Local Plan 7.14 and 7.15, necessary, and Policy OS1 applied.</p> <p>2. Ifield Brook Meadows</p>

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			<p>Ifield Brook Meadows is natural water meadow and a designated Crawley Local Green Space; however, the land is owned by Homes England. Whilst under the proposals there are no plans to build houses on this land, there are plans to perhaps alter it from its current 'natural green space' to park land, which would have a negative impact on the area's quality. In addition, there are plans to add footpaths and lighting, which would negatively impact its delicate 'water meadow' eco system.</p> <p>Again, should HDC allocate West of Ifield for development within its local plan, and /or a planning application be proposed, Save West of Ifield would deem assessments as detailed in Crawley Local Plan 7.14 and 7.15 necessary.</p> <p>3. Crawley's last remaining rural fringe. The land to the west of Ifield is Crawley last remaining rural fringe, widely used by the public for exercise and leisure. Should this land be built on this would have a detrimental effect on Crawley residents physical and mental health</p> <p>Suggested Modifications: Save West of Ifield would again suggest that the policies set out within Chapter 7 of Crawley Borough Council's Local plan be referred to in the event of HDC allocating West of Ifield for development in its local plan, and/or if a planning application is received by them.</p>
REP/087 (2023)	Woodland Trust	OS2	<p>Policy OS2: Provision of Open Space and Recreational Facilities We welcome this policy, in particular the reference in 7.23 to applying Natural England's Accessible Natural Green Space Standard and the Woodland Trust's Woodland Access Standard for accessible natural green space and woodland.</p> <p>Suggested Modifications:</p>
REP/113 (2023)	Natural England	OS2	<p>Policy OS2: Provision of Open Space and Recreational Facilities We support this policy's requirements regarding contributions towards natural greenspaces and green infrastructure, in line with the aims of the NPPF (paragraphs 20. 131. 174.) and Goal 10 of the EIP, specifically the commitments and actions relating to improving access to nature. Additionally we support the requirements relating to biodiversity net gain and green infrastructure obligations, in line with the aims of the NPPF (paragraphs 20. 91. 150. 171. & 181) and various goals and actions of the EIP relating to green infrastructure provision.</p> <p>Suggested Modifications:</p>
REP/032 (2023)	West Sussex County Council	OS3	<p>WSCC wish to withdraw their previous comments in relation to Policy OS3 as the policy is now more positively worded, referring to 'enhancing' Public Rights of Way in accordance with the NPPF.</p> <p>Suggested Modifications:</p>

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REP/005 (2023)	Thames Water	IN1 8.10	<p>As you will be aware, Thames Water are the statutory sewerage undertaker for the Borough.</p> <p>We support Policy IN1 and paragraph 8.10 in principle, but consider that there should be specific mention in the Policy to wastewater/sewerage infrastructure, similar to the separate policy IN3 on telecommunications.</p> <p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”</p> <p>Paragraph 11 states: “Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:</p> <p>a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”</p> <p>Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”</p> <p>Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”</p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network. The Neighbourhood Plan should therefore seek to ensure that there is adequate wastewater and water supply</p>

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			<p>infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.</p> <p>The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water's asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.</p> <p>From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service.</p> <p>The changes mean that more of Thames Water's charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.</p> <p>Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:</p> <ul style="list-style-type: none"> - The developments demand for water supply infrastructure; - The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and - The surface water drainage requirements and flood risk of the development both on and off site and can it be met. Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements: <p>Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements: https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>Suggested Modifications: Addition to Policy IN1: "The Local Planning Authority will seek to ensure that there is adequate water and wastewater/sewerage infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement</p>

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			<p>requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</p> <p>It would also be helpful to amend the supporting paragraph 8.10 to refer to the Thames Water free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at: https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p>
REP/032 (2023)	West Sussex County Council	IN1 (Infrastructure Plan)	<p>The County Council considers the level of information currently available on the arrangements for delivery of the transport mitigation to be insufficient to demonstrate deliverability. Therefore, the Local Plan, as a whole, is not yet considered to be effective or compliant with Paragraphs 11, 16 and 106 of the NPPF. WSCC therefore maintains a holding objection to the Local Plan and will continue to work with Crawley Borough Council to consider if this objection can be withdrawn.</p> <p>The transport study identifies a package of highways mitigation and sustainable transport schemes in the Borough to mitigate planned development. The County Council’s experience is that it is unlikely that schemes will be fully funded using developer contributions (because doing so would not be compliant with the CIL regulations), so delivery of these schemes will be partially dependent on securing funding from central Government or other sources that is not guaranteed. The Infrastructure Plan currently fails to identify the scheme-specific requirements for additional funding and the overall scale of additional funding required.</p> <p>For this reason, it is unclear how the transport mitigation measures, identified through the transport study, will be funded and the extent to which they will rely on non-development related sources. It is considered that the Infrastructure Plan should explain how sustainable transport infrastructure schemes and measures can potentially be funded as well as information on the rationale, phasing, cost and delivery arrangements. However, it is recognised that there will be some gaps in the information, due to schemes being at an early stage particularly those that are needed towards the end of the plan period. Therefore, we request further information/wording is provided in the Infrastructure Plan and Policy IN1 (Infrastructure Provision) to identify how the Council will work with key delivery partners to prioritise schemes and secure additional funding and delivery of the transport mitigation required over the plan period to ensure the plan is effective.</p> <p>In order to address this issue, the above should be reflected in policy. Additional wording could be included in Policy IN1 (Infrastructure Provision) to explain that CIL will be used to contribute towards the cost of improvements to mitigation measures in the Infrastructure Plan and that new development may also be required to deliver or contribute towards specific improvements directly related to the development. The Policy could explain that in order to deliver the transport mitigation requirements the Council will work</p>

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			<p>proactively with National Highways, West Sussex County Council, other transport and service providers and developers to provide a better integrated transport network and to improve accessibility to key services and facilities. Also, that opportunities to secure funding to implement the package of improvements (set out in the Infrastructure Plan) will be maximised by working proactively with government agencies including National Highways, other public sector organisations and private investors.</p> <p>Suggested Modifications: It is considered that the Infrastructure Plan should explain how sustainable transport infrastructure schemes and measures can potentially be funded as well as information on the rationale, phasing, cost and delivery arrangements. However, it is recognised that there will be some gaps in the information, due to schemes being at an early stage particularly those that are needed towards the end of the plan period. Therefore, we request further information/wording is provided in the Infrastructure Plan and Policy IN1 (Infrastructure Provision) to identify how the Council will work with key delivery partners to prioritise schemes and secure additional funding and delivery of the transport mitigation required over the plan period to ensure the plan is effective.</p> <p>In order to address this issue, the above should be reflected in policy. Additional wording could be included in Policy IN1 (Infrastructure Provision) to explain that CIL will be used to contribute towards the cost of improvements to mitigation measures in the Infrastructure Plan and that new development may also be required to deliver or contribute towards specific improvements directly related to the development. The Policy could explain that in order to deliver the transport mitigation requirements the Council will work proactively with National Highways, West Sussex County Council, other transport and service providers and developers to provide a better integrated transport network and to improve accessibility to key services and facilities. Also, that opportunities to secure funding to implement the package of improvements (set out in the Infrastructure Plan) will be maximised by working proactively with government agencies including National Highways, other public sector organisations and private investors.</p>
REP/032 (2023)	West Sussex County Council	IN1 (Viability Assessment)	<p>Policy IN1 (Infrastructure Provision) is worded flexibly to secure CIL contributions or S106 for the funding of education infrastructure.</p> <p>WSCC would like to withdraw its previous comment (from 2021) in relation to the 'Whole Plan Policies and Community Infrastructure Levy Viability Assessment' (March 2021). The Viability Assessment update (December 2022) clarifies that, there is the possibility of s106 monies for education and other infrastructure being appropriate outside of the scope of CIL but no such strategic scale/neighbourhood-level development is currently proposed in the local plan and therefore this scenario is unlikely and unforeseeable.</p> <p>Suggested Modifications:</p>

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REP/055 (2023)	Gatwick Green (Wilky)	IN1	<p>1.0 Introduction</p> <p>Background</p> <p>1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to the Planning Obligations Annex in the Daft Crawley Borough Local Plan, 2023 (DCBLP).</p> <p>1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by TWG/GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) (the Site) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8..</p> <p>Scope of representation</p> <p>1.3 This representation sets out the evidence in support of Strategic Policy IN1 with reference to:</p> <ul style="list-style-type: none"> • The National Planning Policy Framework (NPPF, 2021). • The Planning Practice Guidance (PPG). <p>2.0 Strategic Policy IN1</p> <p>Intention of policy</p> <p>2.1 The purpose of Strategic Policy IN1 is to ensure that development on specific sites and across Crawley is accompanied by the delivery and maintenance of on-site and off-site infrastructure, including any infrastructure provided outside the Borough. 'Infrastructure' is defined in the DCBLP glossary and covers a wide range of physical public facilities², but does not include services, although this is referenced in the Reasoned Justification at paragraph 8.7 – for consistency, the definition ought to be adjusted. The policy has four parts:</p> <ol style="list-style-type: none"> 1. Development will be permitted where it is supported by, and coordinated with, the delivery and maintenance of infrastructure on or off-site or outside Crawley Borough, including the need to address any cumulative effects of development.

² 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.

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			<p>2. Protects existing infrastructure facilities and services from loss to development, unless there is sufficient alternative provision or an equivalent replacement can be provided.</p> <p>3. Community Infrastructure Levy (CIL) applies to certain development as required in the Council's adopted CIL charging schedule.</p> <p>4. 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 anticipated contributions are set out in the Planning Obligations Annex associated with policies in the DCBLP.</p> <p>2.2 The cross-reference to the Planning Obligations Annex (the Annex) is important – the policy must be read and interpreted as an integrated policy with the Annex to ensure development within Crawley is served by, and helps provide, infrastructure of a suitable scale, quality and location so as to avoid harmful impacts. The Annex sets out the basis for planning obligations under various policies in the form of works, derived from contribution amounts based on formulas or generic approaches. This includes a formula for a sustainable transport contribution, which applies to all residential and commercial developments outside of the Gatwick Airport Boundary.</p> <p>National planning policy and guidance</p> <p>2.3 Strategic Policy IN1 is considered to be in accordance with the policy and guidance contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The need to plan for and protect infrastructure features throughout the NPPF. In relation to strategic infrastructure related to strategic land use policies such as Strategic Policies EC1 and EC4, it requires strategic policies to make sufficient provision for, <i>inter alia</i>, infrastructure to serve strategic development; such infrastructure includes transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, the provision of minerals and energy (including heat), and community facilities (such as health, education and cultural infrastructure) (para 20). The NPPF requires joint working between strategic policy-making authorities and relevant bodies to determine where additional infrastructure is necessary (para 26).</p> <p>2.4 Local Plans should set out the contributions expected from development, including for 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 (para 34). Paragraphs 55 – 58 deal with planning obligations to bring about the delivery of infrastructure related to new development. The policy guidance states that planning authorities should use conditions on a planning permission where possible, or otherwise, where a condition is not appropriate, use planning obligations. Where planning obligations must be secured, they must only be sought where they meet the tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations (CIL) 2010,</p>

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			<p>i.e. they are 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.</p> <p>2.5 NPPF paragraph 57 goes on to confirm the importance of up-to-date policies that identify contributions expected from development – planning applications in accordance with such policies will be treated as being viable in line with the viability assessment of the Local Plan. The weight to be given to scheme-specific viability assessments at the application stage will depend on how up-to-date the Plan and related viability assessment are and any changes in the circumstances of the site since the Plan was adopted.</p> <p>2.6 The importance of providing infrastructure features throughout the NPPF in relation to achieving sustainable development (para 8a); building a strong and competitive economy (para 81); promoting healthy and safe communities (para 92c); promoting sustainable transport (Section 9); supporting high quality communications (Section 10), and meeting the challenges of climate change (Section 14).</p> <p>2.7 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on planning obligations. PPG sets out guidance on the scope, nature and use of planning obligations under CIL or developer contributions. The PPG states that policies for planning obligations should be set out in plans and examined in public and informed by evidence of infrastructure needs and a proportionate assessment of viability (Paragraph: 004 Reference ID: 23b-004-20190901).</p> <p>2.8 It is considered that Strategic Policy IN1 provides an appropriate basis for securing reasonable and proportionate planning obligations from new development. It is therefore consistent with national policy and guidance on infrastructure and planning obligations, and so represents a <u>sound policy in the context of the tests at paragraph 35 of the NPPF.</u></p> <p>The need to retain flexibility in application</p> <p>2.9 PPG states that the evidence of need for infrastructure can be standardised or formulaic, and plan-makers should consider how needs and viability may differ between site typologies and may choose to set differential requirements. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. PPG also states that developers may be asked to provide contributions for infrastructure in several ways (Paragraph: 003 Reference ID: 23b-003-20190901), implying that there should be flexibility in how that is achieved, such as through planning obligations of contributions under CIL.</p> <p>2.10 PPG goes on to state that “...if a formulaic approach to developer contributions is adopted, the levy can be used to address the cumulative impact of infrastructure in an area, while planning obligations will be appropriate for funding a project that is directly related to that specific development”. Whilst this guidance implies a binary approach to the funding and delivery of infrastructure, in reality the picture</p>

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			<p>will be somewhat less clear. Some infrastructure 'projects' may be clearly required, whilst others may in part/full be triggered by past/future underlying growth or other development; in such cases, this may require a more nuanced approach. This therefore implies that the DCBLP should include some text that reflects the need for a flexible approach to the application of Policy IN1 and the Annex. This supports the wording in Strategic Policy IN1 that:</p> <ul style="list-style-type: none"> • Developer contributions will be sought 'where appropriate'. • That contributions should be in accordance with the tests in the CIL Regulations. • That the Planning Obligations Annex collates the 'anticipated' planning obligations associated with the DCBLP policies. <p>2.11 The policy therefore offers suitable room for reasonable and flexible application in the context of the tests in the CIL Regulations and other factors relevant at the time a planning application is made.</p> <p>2.12 However, this flexibility is not reflected in the reasoned justification for Strategic Policy IN1. Paragraph 8.9 of the DCBLP sets out the approach to planning obligations and CIL, but it is considered that the Plan would benefit from some text to summarise the core of the Council's approach and its role in working with developments to bring infrastructure forward. Aligned with the need for some flexibility, GGL has made representations to Strategic Policy EC4, Policy EC5 and the Planning Obligations Annex variously seeking adjustments to policy/supporting text to provide more flexibility in the means by which infrastructure is to be secured, and the need for the developer and the Council to work together in that regard.</p> <p>Suggested Modifications:</p> <p>3.0 Proposed changes to Reasoned Justification to Strategic Policy IN1</p> <p>3.1 In order to reflect the need to ensure a flexible approach to the identification of the most appropriate form of planning obligations and the Council's role in that regard, it is proposed that the following text be added to the end of paragraph 8.9 of the DCBLP: <i>"In summary, infrastructure will be funded via CIL or development contributions under s106, or otherwise provided as works undertaken by developers so as to make development acceptable in planning terms. Crawley Borough Council will work with developers to secure the delivery of infrastructure."</i></p> <p>3.2 Consistent with the above change, it is considered that the Infrastructure Plan (May 2023) (IP - part of the Council's evidence base) should contain the text noted above under the section headed 'How will infrastructure be delivered?'. The IP should also be updated with regard to any specific infrastructure projects required to make Gatwick Green acceptable in planning terms</p>
REP/056 (2023)	Gatwick Airport Limited	IN1	<p>IN1: Infrastructure Provision</p> <p>52. We note the reordering of the text in the second paragraph of the policy but continue our support for this policy for reasons set out in paragraph 10.1 of our representations on the 2020 Regulation 19 DCLP.</p>

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			Suggested Modifications:
REP/062	Environment Agency	IN1 8.11	<p>Page 100, 8.11, on “The Water Cycle Study Crawley Addendum Report (January 2021) identifies that the flow permit for Crawley Wastewater Treatment Works is likely to be exceeded towards the end of the 2025-2030 period (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.”</p> <p>Comment: The local plan correctly states that there may be a long lead time for wastewater treatment upgrades. It is therefore imperative that Crawley Borough Council is proactive and initiates discussion with the water company, helping the company by providing relevant data and information they require.</p> <p>Page 100, 8.11, on “Wastewater/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.”</p> <p>Comment: The Crawley Borough Council should be proactive by encouraging developers to engage with the water company early in the planning process.</p>
			Suggested Modifications:
REP/148	NHS Sussex ICB	IN1 Local Plan Planning Obligation Annex Infrastructure Plan	<p>Thank you for the opportunity to respond to the Crawley Local Plan.</p> <p>The potential developments and increase in population has a significant impact on NHS services, in particular, primary care (general practice, dental, pharmacy and optometry) but also acute (hospital), community and mental health services.</p> <p>The NHS led Crawley Programme is ensuring we tailor our health services to meet the needs of our population. Part of this work is ensuring we use our health and local assets more effectively and to ensure we co-locate health and case services where necessary, and ensure services are closer to our communities. We have been working with the Council and are grateful for Clem Smith’s (Head of Economy & Planning at Crawley Borough council) involvement.</p>

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			<p>We expect to understand the service estate need by March 2024 at the latest. Our response therefore is provided recognising that over the coming year we will have a more rounded view of our estate need. However, we are able to set out the need based on the implications of the Crawley Local Plan and the direct impact for general practice only at this time.</p> <p>Our findings are that circa 20,000 new residents are planned over the period of the Crawley Local Plan. This is taken from the housing trajectory of at least 5,000 homes in the next 10 years and further growth beyond that. Using building sector indices, premises required to deliver care just for these new homes growth is 1,350m. This equated to circa £7.8m.</p> <p>As infrastructure suitable for NHS service delivery is not readily available, the solution to the needs is in work up progress. The barrier to that development is the source of funding from local council plans and/or local Infrastructure Delivery (IDP) plans.</p> <p>In other council areas in West Sussex, this has been solved by the work on local plans and IDPs, through either s106 specific housing solutions or through an allocation of the infrastructure levy from CIL. Thus, the council needs, residents and NHS are aligned.</p> <p>We see this as a likely outcome from the Crawley Local Plan work, as the housing growth has been identified.</p> <p>Suggested Modifications: The NHS supports the local plan, on the assumption that the local population growth from housing and infrastructure levy on housing, is identified to support the NHS plan for General Practice. The fiscal value of the infrastructure is £7.8m for general practice.</p>
REP/152	Save West of Ifield Campaign	IN1	<p>In the event that further developments occur on 'At Crawley' on Crawley's boundary and especially a scheme the size of the proposed Homes England site(s) West of Ifield it will be necessary to upgrade the transport infrastructure within Crawley in order to support the proposals. In specific terms there will be a need to:</p> <ul style="list-style-type: none"> • upgrade the capacity of Ifield station including the parking provision • install walking and cycling routes within Crawley to an approved standard (LTN1/20) from these sites to the key trip attractors in Crawley. This would include, but not be limited to, Manor Royal, Gatwick Airport, the Town Centre, the Leisure Park, K2, The Hawth, Ifield Station. <p>Any development 'At Crawley' should be required to improve connectivity within Crawley Borough area to improve connectivity to existing infrastructure and to improve it in order to further encourage sustainable transport and reduce car usage and pollution.</p> <p>It should be made clear that it is a requirement for these improvements to be provided and funded by any external developments.</p>

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			Suggested Modifications:
REP/166 <i>(check 2020 – REP/059 and 2021 reps)</i>	Surrey County Council		<p>Consultation on the draft Submission Crawley Borough Local Plan Thank you for consulting Surrey County Council (SCC) on the draft Submission Crawley Borough Local Plan. We previously responded by letter, dated 2 March 2020, to the consultation on the initial Regulation 19 Local Plan Review and by letter dated, 30 June 2021, to the second stage of Regulation 19 Consultation. Our earlier comments related to minerals and waste, education, and highways. This is an officer response, and our comments are set out below in relation to the council's role as the Education Authority, the Highways Authority and the Minerals and Waste Planning Authority for Surrey.</p> <p>Suggested Modifications:</p>
REP/166 <i>(check 2020 – REP/059 and 2021 reps)</i>	Surrey County Council	IN1 IN2 Infrastructure Plan	<p>Education</p> <p>As we said in our June 2021 comments secondary school provision is constrained within the areas of Surrey closest to the border with Crawley and one of the closest Surrey Secondary Schools, Oakwood School in Horley, does not have the capacity to take additional pupils from Crawley. Oakwood School has been expanded to 11 forms of entry - 330 places (since 2021) and it is very unlikely to be able to expand further. We are in discussion with colleagues in West Sussex Education place planning about the problem of lack of secondary places in the wider area.</p> <p>In addition, we are expecting demand for primary places in Horley to exceed supply and will mitigate this by adding a bulge class to at least one primary school as well as allocating children to travel to schools north of the Horley area.</p> <p>Suggested Modifications:</p>
REP/005 (2023)	Thames Water	IN2	<p>Local Plans should consider the requirements of the water companies for land to enable them to meet the demands that will be placed upon them as recognised in paragraph 8.10 This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in the AMP7 period which runs from 1st April 2020 to 31st March 2025 and does not therefore cover the whole Local Plan period. AMP8 will cover the period from 1st April 2025 to 31st March 2030.</p> <p>Suggested Modifications:</p> <p>Addition to Policy IN2: "The development or expansion of waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised."</p>

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REP/011 (2023)	National Highways	IN2	<p>This policy should stress the need for new infrastructure to be sited at locations which are highly accessible by sustainable transport. At present it only requires major facilities to be accessible 'by a variety of means of transport', which can include the car. There should be an emphasis on reducing the need to travel (overall) to comply with Circular 1/2022.</p> <p>Suggested Modifications:</p>
REP/032 (2023)	West Sussex County Council	IN2 8.14	<p>Suggested Modifications: Supporting Text It is recommended that paragraph 8.14 is amended from 6-8FE to 4-6FE to reflect the latest wording in the Infrastructure Plan in relation to the need for additional forms of entry at secondary school level during the course of the Local Plan.</p>
REP/050 (2023)	Homes England	IN2	<p>Policy IN2: Location and Provision of New Infrastructure Policy IN2 provides the ability for education facilities to be come forward on sites that are allocated for other uses (including housing) where there is a demonstrable need arising that cannot be met on another site. As per the Duty to Cooperate Statement and Infrastructure Plan, the council's evidence base highlights a need for secondary education provision that cannot currently be accommodated within the borough's administrative boundary.</p> <p>Supporting text paragraph 8.14 goes on to state that the Infrastructure Plan recognises an estimated need for around 6-8 additional forms of entry at secondary school level during the course of the Plan, and a new secondary school is therefore likely to be needed and that discussions are ongoing with neighbouring authorities about opportunity for a new secondary school on a strategic development close to Crawley. In this regard, Land West of Ifield would align with the Draft Crawley Local Plan as providing opportunity to deliver a secondary school in proximity to the town that would cater for both the Land West of Ifield development and have potential to address some of the existing shortfall in provision.</p> <p>However, it is noted that the 6 – 8 FE identified in the Infrastructure Plan is presented as a range for the Borough as a whole and while a number of evidence studies are referenced, it is not clear how the need has been identified and how this may change across the plan period. Further evidence is required as to whether secondary education provision needs to be provided as part of a single site or through a combination of new provision and extensions to existing schools.</p> <p>Suggested Modifications: Therefore, while an Infrastructure Plan can be updated regularly, a local plan cannot and therefore specific reference to the required FE within the supporting text should be more flexible, allowing it to be updated and clarified through future iterations of the Infrastructure Plan. Therefore, it is suggested that paragraph 8.14 of the supporting text is updated to read:</p>

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			<i>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.</i>
REP/056 (2023)	Gatwick Airport Limited	IN2	IN2: The Location and Provision of New Infrastructure 53. We continue our support for this policy for reasons set out in paragraph 11.1 of our representations on the 2020 Regulation 19 DCLP. Suggested Modifications:
REP/150	90 North Group Limited	IN2 TC1 TC2	Due to the projected population increase in the Crawley area, especially amongst children, I do not consider the current allocation of educational establishments, (primary, secondary and further higher education) will service the area properly, and greater consideration and planning needs to be given to service this logistical requirement. Suggested Modifications: I would like to propose and encourage the wording of the Local Plan Policy will encourage and look more favourably upon future planning applications for new education establishments, especially from owners of existing high street retail property that might cover sufficient areas that could cater for educational use, and which have been unoccupied and/or vacant for more than say 2 continuous years. I would also like to propose and see the site known as '100 High Street, Crawley, RH10 1BZ (former Morrisons Supermarket)', which falls under this category is zoned as a future site for education on the Local Plan Map. Interest for educational use on this particular property site is already being shown, but an actual local plan zoning will help to accelerate this opportunity. This in turn will help to elevate a long standing retail vacancy which has been remarketed for let for over 3 years without any success. It will then also help to discourage homelessness, drug use and anti-social behaviour that is currently occurring in this part of the town centre.
REP/152	Save West of Ifield Campaign	IN2	Section referring to Water Neutrality on p 100 SWOI Comment While the council sees increased flood risk from additional housing being mitigated by developers (presumably by installation of SUDs), it also acknowledges the need for increased sewerage capacity because the Crawley Wastewater Treatment Works (CWWTW) is almost at capacity. A 10-year lead time is needed for the enlargement of CWWTW, which would restrict major development should take place prior to 2033 at the earliest. It is not clear how this is consistent with the delivery of a minimum of 5,030 in the

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			borough and a further 7,050 in neighbouring authorities, more than half of which are predicted to be delivered before 2033 (see figures on p 163, under H1 Housing Provision).
			Suggested Modifications:

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REP/032 (2023)	West Sussex County Council	Infrastructure Plan	<p><u>Suggested Changes to Infrastructure Plan</u> <u>Cycling and Walking strategy</u> The Crawley LCWIP sets out the ambition to develop a network of active travel routes across the Borough, which provides a strong basis on which to identify priorities to support planned development. However, the LCWIP does not currently include a clear set of priorities linked to planned development or specific proposals to connect the network to development sites identified in the LP. Policy ST1 in the local plan highlights the necessity of cycling and walking to major developments without clearly specifying the priorities i.e. the routes/schemes that are needed to help mitigate planned development. An assessment of Crawley Housing Trajectory suggests that in the first five years of the Plan Period, the Forge Wood Development and routes that would connect it to key destinations are likely to be important.</p>
			<p>Suggested Modifications: To address these points, it is recommended that CBC identify short term (i.e. to be progressed in the first five years) active travel priorities and phasing (where possible) linked to delivery of development sites in the Infrastructure Plan. This would help to deliver the 9% reduction in car mode share that has been assumed in the Crawley Transport Study draft 2022.</p> <p>Just as recommended above for the cycling and walking schemes, it is recommended that the CBC Infrastructure Plan classifies the schemes listed in its current findings section page 45 according to short terms, mid-terms, and long terms throughout the designated Infrastructure plan period i.e. 2024- 2040. It is also recommended to provide greater certainty for schemes to be delivered in the short term as the plan will be reviewed every 5 years in accordance with the CBC housing development trajectory.</p> <p>The Kilnwood Vale development is not dependent on provision of a new railway station on the Arun Valley Line and in effect such a station would only be 1km away from the Faygate station. Furthermore, the station which is described in the Infrastructure Plan does not feature within the WSTP; As it has proved difficult to demonstrate that there is a business case for such a scheme, CBC should consider removing this scheme from the Infrastructure Plan to manage stakeholder expectations.</p>
REP/032 (2023)	West Sussex County Council	Infrastructure Plan	<p><u>Education (Early Years)</u> It is recommended that the Infrastructure Plan makes reference to the need to be flexible and updated as a result of changes to the local authority statutory duties around Early Years and Childcare which were announced in the spring budget (Early education entitlements and funding update: March 2023 - GOV.UK (www.gov.uk)). These changes will considerably increase the demand for funded places, starting from April 2024 and may increase the requirement for provision of places for Early Years</p>
			<p>Suggested Modifications:</p>
REP/032 (2023)		IN1	The County Council considers the level of information currently available on the arrangements for delivery of the transport mitigation to be insufficient to demonstrate deliverability. Therefore, the Local Plan, as a whole, is

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	West Sussex County Council	Infrastructure Plan	<p>not yet considered to be effective or compliant with Paragraphs 11, 16 and 106 of the NPPF. WSCC therefore maintains a holding objection to the Local Plan and will continue to work with Crawley Borough Council to consider if this objection can be withdrawn.</p> <p>The transport study identifies a package of highways mitigation and sustainable transport schemes in the Borough to mitigate planned development. The County Council's experience is that it is unlikely that schemes will be fully funded using developer contributions (because doing so would not be compliant with the CIL regulations), so delivery of these schemes will be partially dependent on securing funding from central Government or other sources that is not guaranteed. The Infrastructure Plan currently fails to identify the scheme-specific requirements for additional funding and the overall scale of additional funding required.</p> <p>For this reason, it is unclear how the transport mitigation measures, identified through the transport study, will be funded and the extent to which they will rely on non-development related sources. It is considered that the Infrastructure Plan should explain how sustainable transport infrastructure schemes and measures can potentially be funded as well as information on the rationale, phasing, cost and delivery arrangements. However, it is recognised that there will be some gaps in the information, due to schemes being at an early stage particularly those that are needed towards the end of the plan period. Therefore, we request further information/wording is provided in the Infrastructure Plan and Policy IN1 (Infrastructure Provision) to identify how the Council will work with key delivery partners to prioritise schemes and secure additional funding and delivery of the transport mitigation required over the plan period to ensure the plan is effective.</p> <p>In order to address this issue, the above should be reflected in policy. Additional wording could be included in Policy IN1 (Infrastructure Provision) to explain that CIL will be used to contribute towards the cost of improvements to mitigation measures in the Infrastructure Plan and that new development may also be required to deliver or contribute towards specific improvements directly related to the development. The Policy could explain that in order to deliver the transport mitigation requirements the Council will work proactively with National Highways, West Sussex County Council, other transport and service providers and developers to provide a better integrated transport network and to improve accessibility to key services and facilities. Also, that opportunities to secure funding to implement the package of improvements (set out in the Infrastructure Plan) will be maximised by working proactively with government agencies including National Highways, other public sector organisations and private investors.</p> <p>Suggested Modifications:</p> <p>It is considered that the Infrastructure Plan should explain how sustainable transport infrastructure schemes and measures can potentially be funded as well as information on the rationale, phasing, cost and delivery arrangements. However, it is recognised that there will be some gaps in the information, due to schemes being at an early stage particularly those that are needed towards the end of the plan period. Therefore, we request further information/wording is provided in the Infrastructure Plan and Policy IN1 (Infrastructure</p>

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			<p>Provision) to identify how the Council will work with key delivery partners to prioritise schemes and secure additional funding and delivery of the transport mitigation required over the plan period to ensure the plan is effective.</p> <p>In order to address this issue, the above should be reflected in policy. Additional wording could be included in Policy IN1 (Infrastructure Provision) to explain that CIL will be used to contribute towards the cost of improvements to mitigation measures in the Infrastructure Plan and that new development may also be required to deliver or contribute towards specific improvements directly related to the development. The Policy could explain that in order to deliver the transport mitigation requirements the Council will work proactively with National Highways, West Sussex County Council, other transport and service providers and developers to provide a better integrated transport network and to improve accessibility to key services and facilities. Also, that opportunities to secure funding to implement the package of improvements (set out in the Infrastructure Plan) will be maximised by working proactively with government agencies including National Highways, other public sector organisations and private investors.</p>
REP/062	Environment Agency	Infrastructure Plan	<p>Infrastructure Delivery Plan (IDP) We have reviewed the Flood Defence section of this Plan, and we are pleased to note the content has been updated in line with comments we made at a previous review.</p> <p>Suggested Modifications:</p>
REP/166 (check 2020 – REP/059 and 2021 reps)	Surrey County Council	IN1 IN2 Infrastructure Plan	<p>Education As we said in our June 2021 comments secondary school provision is constrained within the areas of Surrey closest to the border with Crawley and one of the closest Surrey Secondary Schools, Oakwood School in Horley, does not have the capacity to take additional pupils from Crawley. Oakwood School has been expanded to 11 forms of entry - 330 places (since 2021) and it is very unlikely to be able to expand further. We are in discussion with colleagues in West Sussex Education place planning about the problem of lack of secondary places in the wider area.</p> <p>In addition, we are expecting demand for primary places in Horley to exceed supply and will mitigate this by adding a bulge class to at least one primary school as well as allocating children to travel to schools north of the Horley area.</p> <p>Suggested Modifications:</p>
REP/168	Network Rail	Infrastructure Plan	<p>Infrastructure Plan It should be noted that the Croydon Area Remodelling Scheme (CARS) has been delayed and there is no updated timetable for completion at this stage. Reference to this within the rail section can be retained however it may be necessary to provide an update to this in the near future.</p>

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			<p>Consideration should be given to the impacts of the amount of development proposed within Crawley Town Centre on the level crossing located on Brighton Road. Due to the location and proximity of this crossing, it is anticipated that this will be subject to increased use by cars, pedestrians and cyclists. Due to this, alternative mitigations may need to be considered to reduce the risk at this crossing and reference to this should be included within the Infrastructure Plan. It would be expected that any such mitigations would be funded by developer contributions due to the impacts of growth.</p> <p>Suggested Modifications:</p>

Crawley

Local Plan

Economic Growth

Regulation 19 Consultation May-June 2023 Representations
Local Plan Chapters 9 – 11 and Employment Land Trajectory

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REP/011 (2023)	National Highways	Chapter 9: Economic Growth & Social Mobility	<p>NH understand that the development numbers for employment in the Transport Study Report (2022) were derived in 2020. The numbers in the submission version of the Plan appear similar in terms of additional employment floorspace. However, NH are unable to confirm that the allocations and windfalls are the same or similar between the current Local Plan and the Transport Study Report. It is unclear whether the amount of consented and non-consented allocations has changed as NH are primarily concerned with the non-consented element of the Plan (allocations and windfalls). Clarity is sought.</p> <p>Suggested Modifications:</p>
REP/027 (2023)	LRM Planning on behalf of WT Lamb Properties, the Dye Family and Elliott Metals/the Simmonds Family	EC1	<p>POLICY EC1: SUSTAINABLE ECONOMIC GROWTH</p> <p>1. Our clients object to the policy in its current form as it leads to an under estimation of the amount of employment land that is required over the course of the plan period. It does not comply with the requirements of NPPF nor NPPG and would not meet the requirements of NPPF para 35 in that it is not justified, effective or positive. Indeed, there are major methodological shortcomings within the underlying evidence base that must be remedied if the Plan is to be found sound.</p> <p>2. Furthermore, given our findings in its current form the policy would not support the overarching vision of the Plan which is to inter alia encourage sustainable economic growth and make Crawley a place that people want to live and work.</p> <p>National Planning Policy</p> <p>3. Chapter 6 of the National Planning Policy Framework (NPPF) sets out the Government's requirements for "Building a strong, competitive economy", Para. 80 is clear that planning policies should help create the conditions in which "businesses can invest, expand and adapt".</p> <p>4. It places significant weight on supporting economic growth and productivity taking account of local business needs and wider opportunities for development. Such that each area builds on its strengths, counters any weaknesses and addresses the challenges of the future. It is clear that areas with high levels of productivity should be allowed to capitalise on their potential so that Britain can be a global leader in innovation. In this regard, Para. 81 sets out that Policies should: • proactively and positively encourage sustainable economic growth with regard to Local Industrial Strategies and other policies for economic development; • identify strategic sites for local and inward investment to match the strategy and to meet anticipated need; • address any barriers to investment; and • be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances.</p> <p>5. Para. 82 requires that policies should recognise and address the specific locational requirements of different sectors which includes for storage and distribution operators at a variety of scales and in suitably accessible locations.</p>

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			<p>6. Further guidance on providing for economic development needs is set out in Planning Practice Guidance (PPG – 025 Ref IDs: 2a-025-20190220 to 2a-032-20190722). To ensure robust evidence on business needs, local authorities should liaise closely with the business community and take account of Local Industrial Strategies. Councils should take a ‘best fit’ Functional Economic Market Area (FEMA) and then assess the existing employment land stock; the pattern of land supply and loss; evidence of market demand from local data, market intelligence, surveys of business needs, discussions with developers/agents and evidence from business forums; wider market signals on growth, diversification and innovation, and any evidence of market failure.</p> <p>7. This requires close liaison with the business community to understand current and future requirements. In relation to market signals, PPG states that Councils need to look at: Current and robust data on labour demand (jobs/employment forecasts); Labour supply (demographically derived forecasts of the economically active population, i.e. future employees); the trends in take-up of employment land; future property market requirements, and consultation with relevant organisations and study business trends, models and employment statistics, taking account of longer term economic cycles. This work will reveal any quantitative or qualitative mismatches in demand and supply and which market segments are under or over-supplied. Councils should look at a range of robust data to understand the requirements for office, general business and distribution space and which market segments are over/under supplied.</p> <p>8. PPG contains specific guidance on the needs of the logistics sector given its role in the efficient supply of goods, and therefore economic productivity which is a key part of the UK Industrial Strategy. It goes on to note that strategic logistics facilities need significant amounts of land with access to strategic transport networks and that where a need exists, councils should collaborate with infrastructure providers and other interested parties to identify the scale of need.</p> <p>9. Overall therefore, the NPPF and PPG requires that plan-making authorities must address their economic needs in their local plans, which requires an overriding strategy on how and where those needs are to be met. This is critical to achieving a Plan that is sound in accordance with the tests in the NPPF (para 35) and has been considered in more detail by HJA on behalf of our clients.</p> <p>Employment Land Requirement</p> <p>10. Hardisty Jones Associates (HJA) is an expert economic development consultancy with extensive experience in matters relating to employment land evidence for Local Plans. HJA frequently prepares employment land evidence for local authorities to inform their plan making. HJA also provides analysis for a range of clients wanting to understand the quality and robustness of evidence prepared for and on behalf of local planning authorities.</p> <p>11. The HJA review has been prepared by Stuart Hardisty. Stuart is a Director of HJA with 23 years’ experience of economic development consulting and particular expertise in the area of assessing future employment land</p>

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			<p>requirements. Stuart is a Fellow and Director of the Institute of Economic Development. Stuart has led numerous evidence studies on behalf of local authorities and other public bodies; he has appeared as Expert Witness to successfully defend evidence; and has written articles and spoken at conferences on the topic of employment land evidence.</p> <p>12. HJA has been instructed by W T Lamb Holdings to undertake a critical review of the Northern West Sussex Economic Growth Assessment: Supplementary Update for Crawley (Final Report, January 2023) prepared by Lichfields on behalf of Crawley Borough Council. The findings of this review have informed these representations to the Regulation 19 Consultation of the Draft Crawley Local Plan 2024-2040 (May 2023), (hereafter referred to as the new Local Plan).</p> <p>13. The HJA review follows similar evaluations of previous reports which form part of the Northern West Sussex Economic Growth Assessment (EGA). The EGA forms part of the evidence base to the new Local Plan.</p> <p>14. The January 2023 EGA Supplementary Update has been prepared as a result of delays to the new Local Plan, caused by ongoing water neutrality issues in the area.</p> <p>Previous Reviews and Engagement with Crawley Borough Council</p> <p>15. In March 2021, HJA reviewed the new Local Plan and its employment land evidence as was available at the time. This was used to inform W T Lamb Holdings representations to the previous Regulation 19 Consultation¹. The review² identified a number of weaknesses in the evidence base and its failure to fully comply with the requirements of Planning Practice Guidance (PPG). In particular the review identified issues leading to an under provision of industrial and warehousing land within the new Local Plan including:</p> <p>16. These are:</p> <ul style="list-style-type: none"> • Calculation errors in the employment land trajectory; • Failure to make appropriate adjustment for the strength of market opinion, in line with the advice of PPG; and • No meaningful uplift for market sentiment or historic suppressed supply; and • Failing to ensure sufficient provision to replace losses of employment space to other uses. <p>17. Our full response to the previous version of EC1 is included at appendix 2 for ease of reference.</p> <p>18. HJA, alongside W T Lamb Holdings and LRM Planning has also participated in meetings with Crawley Borough Council in April 2021, November 2021 and November 2022 to explain our concerns regarding the evidence base. This engagement included an open offer to discuss our concerns with the authors of the EGA, with a specific offer in advance of the authors preparing the January 2023 Supplementary Update. This offer has not been taken up by Crawley Borough Council or the EGA authors.</p>

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			<p>Overall Conclusions of the EGA Supplementary Update</p> <p>19. The EGA Supplementary Update concludes that there is a reduced requirement for employment land across Crawley Borough when compared to previous editions. This is based on revised economic forecasts which include lower levels of employment growth and a change in the historic time period over which past trends are analysed (now incorporating the Covid-19 impacted years).</p> <p>20. Whereas the previous study identified a total requirement of approximately 40ha, this has now reduced to 26-32ha across the borough. The shortfall, after adjusting for existing supply, falls from around 24ha to 11-17ha.</p> <p>21. In response the new Local Plan has reduced the size of allocation at Gatwick Green.</p> <p>Response to Previous W T Lamb Submissions to Crawley Borough Council</p> <p>22. There is no evidence that any of the points made on behalf of WT Lamb previously have been materially addressed in the January 2023 update. As noted above, this includes ignoring the offer to engage with the EGA authors to discuss and explain our concerns. Detailed Issues</p> <p>23. The following issues have been identified as a result of the review of the January 2023 EGA update.</p> <p>Implications of the Covid affected time period</p> <p>24. Relying on employment data and commercial development data relating to the time period most substantially affected by the Covid-19 pandemic and the related public health restrictions on activity brings risk. As part of the EGA update the 10 year time period for historic analysis has been rolled forward. This now includes the pandemic period. The pandemic was a highly atypical event which has the potential to impact data which is used for the purposes of long term policy planning. In particular, overall employment data for Crawley is substantially affected as a result of the impact on air travel and therefore Gatwick Airport.</p> <p>25. Inclusion of this data has a depressing effect on the overall analysis.</p> <p>Treatment of negative forecast employment change</p> <p>26. The economic forecasts relied upon within the analysis include reductions in employment for activities within light and general industrial property typologies. This leads to a negative requirement for such uses (see paragraph 2.28)1. However, the report notes that the light industrial property typology has been a key driver of new development in Crawley (see paragraph 2.34). This historic activity has been during a period when employment data would also suggest decline. This highlights a key methodological weakness which has been repeatedly stated in HJA's reviews of previous EGA reports. There has been a failure to take a rounded view based on all the evidence. Planning Practice Guidance suggests consideration of a range of evidence including economic forecasts and market based indicators. The employment topic paper2 also highlights the strong market sentiment yet makes no adjustment to the quantum of land required.</p>

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			<p>27. HJA's extensive experience in this field of work has repeatedly found similar trends to that identified in the EGA across other locations. Whilst employment related to light and general industrial property typologies has been in decline for many years, demand for such property remains strong. This is a result of the need to replace stock that is lost from these uses to other activities due to either demand for alternative uses, or due to properties moving beyond their useful economic life or not being suitable to meet modern occupier requirements. The need for sufficient allowance for 'replacement demand' is therefore critical to ensure planning policy does not hamper the future performance of the economy. The treatment of replacement demand within the EGA is inadequate.</p> <p>28. Overall this methodological weakness leads to an under estimate of the future need for light and general industrial sites and premises.</p> <p>Adjusting for historic constraints</p> <p>29. The EGA update explicitly acknowledges that historic supply may have been constrained (see paragraph 2.32). This is also highlighted within the employment topic paper (including paragraphs 4.66 and 4.72). On this basis it is reasonable to infer that historic activity levels could have been suppressed as a result of this constraint. In fact this is explicitly stated in the topic paper. Any projection forward relying on historic activity levels is therefore at risk of underestimating true demand, with upward adjustment required. However, no such adjustment has been made.</p> <p>30. Forward projections are also at risk of being suppressed through including two years' of data affected by the Covid-19 pandemic as noted above. The EGA update draws on the period 2011-21.</p> <p>31. Overall this failure to adjust the assessed need for the identified historic constraints will under estimate the need for future employment sites and premises. The new Local Plan is therefore failing to plan positively.</p> <p>Aligning to future labour supply</p> <p>Methodological absurdity</p> <p>32. The approach to considering future labour supply is fundamentally flawed (see paragraph 2.35). The method adopted by the authors of the EGA effectively exaggerates both positive and negative trends. As such, the adjustments made to address the fact that labour force growth is likely to outstrip labour demand (i.e. modelling an increase in employment to balance the labour market), leads to a larger decrease in the need for light and general industrial sites and premises. This is nonsensical. Higher population will drive additional demand for services and create the potential for increased business start up and growth. In no way will an increased population and labour force accelerate the decline of any particular sector. The effect of this is to falsely reduce the assessed demand for light and general industrial property.</p> <p>33. In order to explain in more detail. Under the 314 dwelling per annum (dpa) scenario there is broad alignment between the demographic analysis and the economic forecasts. However, for the 544 dpa scenario this is not</p>

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			<p>true. The EGA is clear that under this scenario this will drive additional employment requirement, and hence additional sites and premises requirements. Yet the assessment finds to the contrary in the case of light and general industrial.</p> <p>34. The result of this methodological weakness is to reduce the level of light and general industrial need under the higher dwellings scenario. Meeting demographic and housing need</p> <p>35. Further to the above, the new Local Plan makes provision for 314dpa within Crawley Borough. On this basis one might presume the comments above relating to a higher housing and labour force/population scenario are irrelevant. However, the new Local Plan and its evidence base is clear that there will be significant unmet housing need, with a standard method derived need of 755dpa. How this will be met in full is unclear, although reference to urban extensions outside the Crawley borough area, but functionally part of Crawley are addressed. Within the EGA update employment needs for a higher housing figure of 544dpa are set out (based on scenarios initially considered within the housing and employment evidence base in 2020). However, no additional employment land allowance is provided for within the new Local Plan on this basis. The Plan draws on figures from options broadly aligned to the 314dpa scenario.</p> <p>36. It is clear that Crawley is the key economic hub of the sub-region and at the heart of the functional economic market area (FEMA). For that reason, the employment sites and premises requirements associated with that higher level of housing need will also need to be provided within the area; and given Crawley's role, it would be reasonable to expect the lion's share of this need to be located within Crawley. However, there appears to be no adjustment made to capture any of this need within Crawley. The additional requirement associated with the 544dpa scenario is assessed as 42.9ha (as per Table 2.14).</p> <p>37. The employment topic paper (paragraph 4.69) notes that the majority of this demand is expected within the transport and logistics sector. It also notes that there are no other strategic employment sites proposed in the northern west Sussex area to meet the needs of this sector. In which case, the identified demand will go unmet.</p> <p>38. Whilst the employment topic paper considers the transport and logistics sector in more detail, highlighting the strong levels of demand nationally, regionally and locally. The provision of capacity at Gatwick Green within the new Local Plan only meets the minimum level identified based on the 314dpa scenario and makes no attempt to meet any of the identified unmet needs within the sub-region.</p> <p>39. In addition, no consideration of the employment sites and premises requirements associated with the remaining unmet dwelling need is made at all.</p> <p>40. Even if additional housing is not provided in full that does not mean that the population that would be resident within such housing will not be resident within the area. Whilst there may be some constraint on migration, there will also be a limitation on new household formation or increased levels of living within sub-optimal</p>

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			<p>accommodation. Therefore, the employment need, and the associated sites and premises requirements do not disappear.</p> <p>41. On the basis of the evidence presented there is an under provision of employment sites and premises, particularly in the transport and logistics sector to meet the needs arising from higher housing requirements which will be met elsewhere in the sub-region.</p> <p>Providing a buffer</p> <p>42. In our previous reviews we have repeatedly identified the need to address the necessary uplifts to address replacement demand and wider market issues. These have not been adequately addressed or considered.</p> <p>43. Within the latest EGA update a 'buffer' of 10% is applied (see paragraph 2.40) to address:</p> <ul style="list-style-type: none"> • Replacement of some ongoing losses; • Delays to sites coming forward; and • Other relevant factors in the local market. <p>44. In HJA's opinion this is clearly inadequate to deal with such significant issues. Particularly given the evidence presented elsewhere in the EGA (in the latest Update and the previous reports). In particular the issues of historic constrained supply, strong market sentiment and a failure to properly provide for losses of employment sites and premises.</p> <p>45. Assessment of replacement needs should be based on existing stock, and potential losses thereof, rather than a proportion of future requirements.</p> <p>46. On the basis that commercial properties are developed with an anticipated useful economic life of 35 years one might reasonably expect replacement of commercial property to average out at ~3% per annum. In HJA's work for local authorities we acknowledge that such an assumption may often be too strong, given that in reality some premises are used well beyond 35 years. A figure of 1-2% of stock per annum is therefore typically adopted as a starting assumption for testing, with the final assumption informed by available evidence and local market opinion on the age, quality and condition of existing stock. Property that is typically used well beyond its 35th anniversary is often very old stock (e.g. Victorian) that has been very robustly built.</p> <p>47. It has been indicated in other New Towns that much of their commercial property is approaching (or beyond) the end of its useful life and will require replacement within the next 10-20 years. New Towns also are absent the historic property that has shown the capacity to be used well beyond the 35 year threshold. For this reason the level of replacement in Crawley, as a New Town, is potentially higher than 1-2% per annum.</p> <p>48. If 2% per annum is considered a minimum level, equivalent to replacing property every 50 years on an ongoing basis; over the 16 year plan period this would equate to a baseline level of replacement of 32% of existing stock, and potentially higher. This is clearly well above the 10% uplift applied only to the estimated future</p>

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			<p>requirements provision. Nevermind the fact that this 10% uplift has been included to cover not just replacement but a range of other factors as well.</p> <p>49. Without sufficient provision for replacement there is a significant risk that the Crawley borough economy will not have sufficient employment premises to operate effectively. The remedy is an uplift to the provision for employment property across all Use Classes.</p> <p>Conclusions</p> <p>50. HJA's review of the EGA Update has found that there are multiple weaknesses in the EGA methodology. There have been no material changes to the approach despite the points made in previous representations and meetings with the Council. The offer to engage with Lichfields to explain the concerns as previously expressed has not been taken up.</p> <p>51. It is HJA's view that the EGA makes an underestimate of the true PPG compliant requirement based on both the evidence presented within the EGA itself, and weaknesses in the methodology employed.</p> <p>52. It remains HJA's view that is incumbent upon Crawley Borough Council to ensure that its new Local Plan is founded on a sound evidence base in order to be found sound at Examination. On the basis that the evidence on which key policies within the plan relies is not sound the Plan itself is not sound and will require modification to ensure sufficient provision of employment land to meet the needs of the Crawley economy throughout the plan period.</p> <p>53. As set out in this paper the effects are across all employment Use Classes (in terms of replacement) but more specifically within the light and general industrial; and transport and logistics sectors.</p> <p>54. The employment topic paper makes clear that Crawley acts as a key employment hub for the sub region; that there remains strong demand; that there has been historic constraint; and that there are no other strategic employment allocations within the sub region. However, the only additional allocation within the new Local Plan has been reduced in scale to 14ha. This fails to address any of the identified issues which actually confirm the assessed need to be an underestimate.</p> <p>55. The analysis above has identified a series of methodological issues that would need to be rectified in order to comment in detail on the quantitative position, making provision for the higher dwelling scenario might be considered a minimum level, with an unmet industrial and warehousing requirement of 48ha, requiring an additional 34 ha to be provided.</p> <p>Appendix 1. Previous Response by LRM Planning (June 2021) Appendix 1 of the 2021 Submission Review of Employment Land Matters within the Submission Draft Crawley Local Plan: Final Report (Hardisty Jones Associates June 2021)</p>

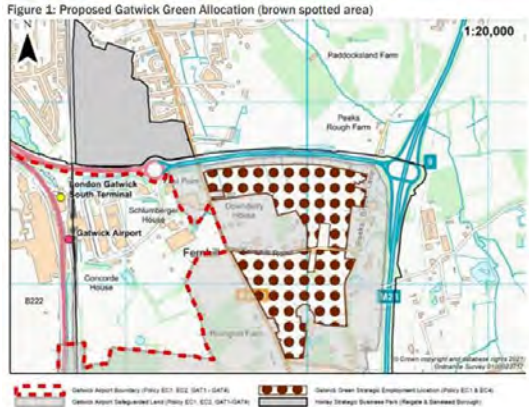
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			<p>Executive Summary</p> <p>i. HJA has been instructed by W T Lamb Holdings Ltd to review employment land matters within the Submission Draft Crawley Local Plan and supporting evidence base.</p> <p>ii. This review has identified a number of issues which lead to the Local Plan under-providing land for industrial and warehousing (B2/B8) uses.</p> <p>iii. A minimum of 3.7-4.6ha of additional industrial and warehousing land should be provided to make up the identified shortfall of 14,780 in the employment land trajectory.</p> <p>iv. Additional provision should also be made, in line with the requirements of PPG, taking into account the strength of market opinion, in order to deliver a more rounded and robust assessment of future B8 requirements; as well as to allow for potential losses of employment space to other uses and through dilapidation and changing occupier requirements.</p> <p>1 Introduction</p> <p>1.0.1 HJA is a specialist economic development consultancy, with particular expertise in advising both public and private sector clients on employment land matters.</p> <p>1.0.2 This report has been prepared by Stuart Hardisty. Stuart is a Director of HJA with more than 20 years' experience of economic development consulting and specifically advising on future employment land requirements. Stuart is also a Director of the Institute of Economic Development leading on employment land matters. This has included speaking at a range of events and authoring multiple articles on the topic. He has advised many Local Authorities, sub-regional partnerships, Local Enterprise Partnerships, regional bodies, national governments and private sector clients on future employment land needs.</p> <p>1.0.3 HJA has been instructed by W T Lamb Holdings Ltd to review employment land matters within the Submission Draft Crawley Local Plan and its supporting evidence base.</p> <p>1.0.4 This short report sets out the summary findings of this appraisal, based on a review of available documentation including:</p> <ul style="list-style-type: none"> • Crawley Submission Draft Local Plan (January 2021) • Northern West Sussex Economic Growth Assessment (January 2020) • Economic Growth Assessment Focused Update for Crawley (September 2020) • Topic Paper 5 – Employment Needs and Supply (January 2021) • Employment Land Trajectory (January 2021) • Submissions made to the Crawley Local Plan process by the Wilky Group

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			<p>1.0.5 HJA has also accessed and analysed employment land monitoring data collected and collated by West Sussex County Council on behalf of Crawley Borough Council.</p> <p>2 Crawley Submission Draft Local Plan</p> <p>2.0.1 This chapter provides a summary review of the key employment land matters within the Crawley Submission Draft Local Plan.</p> <p>2.0.2 Crawley is a key economic driver for a functional economic market area that extends beyond the borough's boundaries. Particular drivers include Gatwick Airport and the large Manor Royal employment area, as well as Crawley Town Centre. The sub-regional role of the Crawley economy is recognised with the presence of the Gatwick Diamond Initiative, as well as being a core location within the Coast to Capital Local Enterprise Partnership (LEP) area.</p> <p>2.0.3 The Emerging Local Plan seeks to plan positively for economic growth in the Crawley area despite the impact of Covid-19 on the area. The Borough has been identified as significantly vulnerable to the economic impact of Covid-19, given its reliance on the passenger air transport sector. Nevertheless, the importance of delivering the sites and premises required for employment purposes is clearly highlighted. For example: "Key to achieving this [economic ambition] is the supporting of economic growth through the delivery of new business space and facilities" "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." "The scope to accommodate identified employment land 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."</p> <p>2.0.4 The proposals for employment land provision draw heavily on the underpinning evidence base, which is reviewed in the next section of this report. The overarching policy position is of a need for 38.7ha of employment land. The residual requirement for industrial uses, after making allowance for existing pipeline supply and removing office requirements is 24.1ha. This is stated to be primarily for B8 type uses.</p> <p>2.0.5 In order to meet the identified shortfall, a strategic employment allocation at Gatwick Green is made. This follows a site selection process drawing on the Housing and Employment Land Availability Assessment (HELAA). It is noted that there were a number of sites promoted for employment purposes located on land safeguarded for airport expansion to the south of the existing Gatwick Airport site boundary. These sites were</p>

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discounted on the basis that the safeguarded land might still be required for a second runway at the airport and should not therefore be released for other uses. The extent of this allocation is shown in Figure 1. The site comprises approximately 47ha.



Source: Crawley Submission Draft Local Plan

2.0.6 Policy EC4 and its supporting text notes that any further industrial floorspace beyond the 24.1ha requirement would need to be demonstrated through appropriate evidence. The policy also highlights a range of landscaping and environmental considerations that will impact upon the net developable area of the site as well as the potential to accommodate a range of ancillary employment and amenity uses.

3 Local Plan Evidence Base

3.0.1 This chapter provides a summary of the key issues emerging from a review of the Local Plan evidence base in respect of employment matters.

3.0.2 The most relevant documents are the Northern West Sussex Economic Growth Assessment Update (January 2020) [EGA] and the Economic Growth Assessment Focused Update for Crawley (September 2020) [EGA Update]. Both documents were prepared by Lichfields on behalf of Crawley Borough Council.

3.0.3 The later study provides an update to take some account of the Covid-19 pandemic and generates the estimates which are taken forward to the Local Plan.

3.1 Northern West Sussex EGA

3.1.1 The EGA looks at the whole Functional Economic Market Area (FEMA). The assessment of future requirements for Crawley Borough includes a very wide range of -1.1ha to +113ha based on a number of

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			<p>approaches and scenarios. The study recommends adopting a figure of +33ha based on a projection of past development trends.</p> <p>3.1.2 Overall the report sets out a positive analysis of the Crawley economy (pre Covid) and the role of the Crawley Borough within the wider FEMA.</p> <p>3.1.3 The analysis notes commercial agent feedback indicating a need for additional land to accommodate strong levels of market driven demand, particularly for industrial and warehousing sites and premises. However, no uplift is applied to reflect this.</p> <p>3.1.4 The analysis of future requirements does not set out any consideration of replacing losses of employment sites and premises to other uses.</p> <p>3.1.5 Within the preferred 'past trends' approach there is no consideration of whether past take up might have been suppressed as a result of constrained supply, or whether the demand profile in the past period was similar to expectations for the future.</p> <p>3.1.6 Given the strength of agent opinion and the failure to consider the implications of losses of employment sites and premises to other uses the final requirements figures put forwarded can be considered an underestimate of total objectively assessed needs.</p> <p>3.2 EGA Focused Update for Crawley</p> <p>3.2.1 This report is positioned as a post Covid check. It draws on revised economic forecasts. The level of growth that is forecast is lower than historic growth rates and is from a respected source. The relevant differences in the considered economic forecasts are discussed on a sectoral basis in order to come to a balanced view.</p> <p>3.2.2 The assessment of future B8 warehousing requirements is primarily driven by forecast employment change (and therefore changes substantially as a result of revised forecasts).</p> <p>3.2.3 In the commentary set out within the EGA Update (paragraph 2.48) it is noted that the Oxford Economics forecasts make allowance for more rapid automation. Whilst the process of automation will have implications for employment and economic development policy more generally (and may temper the rate of growth of employment in the sector), this does not restrict the potential growth in sites and premises requirements.</p> <p>3.2.4 Such issues are considered in the latest Planning Practice Guidance (PPG), which notes a need to make a broader assessment of B8 uses on the basis that employment alone has known weaknesses as a predictor for this sector.</p>

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			<p>3.2.5 There is no clear evidence of any attempt at this wider assessment as part of the EGA. This links across to comments made above (at paragraph 3.1.3) on the original EGA, with commercial agent sentiment not being fully reflected despite clear indications that there is very strong demand.</p> <p>3.2.6 The EGA Update assessment leads to an overall requirement of 38.7ha, which is the figure carried forward to the Pre Submission Local Plan. This is slightly greater than the figure emerging from the original assessment. In the EGA Update the emerging requirements from both baseline job growth and past take-up approaches are very similar (38.7ha and 39.6ha).</p> <p>4 Analysis</p> <p>4.0.1 This chapter set out analysis of the issues identified in the summary reviews contained within previous chapters of this report.</p> <p>4.1 Headline Employment Land Requirement</p> <p>4.1.1 In reviewing the core documents, as summarised above, HJA has identified a number of weaknesses with the overarching analysis. In particular:</p> <ol style="list-style-type: none"> 1. A failure to actively consider the potential need for land to replace losses of existing stock; and 2. A failure to take full account of agent views, particularly for B2/B8 uses. <p>Replacement</p> <p>4.1.2 The recommendation of a need for 38.7ha of employment land emerging from the EGA Update is drawn from the baseline jobs growth approach. This considers only the net change in employment over the plan period, and applies an average employment density for the relevant Use Classes to derive an additional floorspace requirement.</p> <p>4.1.3 This approach is helpful in considering some of the net changes in the economy. However, it fails to consider any of the issues within the existing economy or commercial market. Inherent in the approach is that the entirety of the existing stock of commercial employment sites and premises remains in its appropriate use and fit for purpose for the entirety of the plan period.</p> <p>4.1.4 However, there is highly likely to be a loss of some stock to non-employment uses (through Permitted Development or change of use applications), or becoming redundant through dilapidation, or no longer being aligned to modern occupier requirements. Further, this approach fails to fully consider whether there are changing property requirements within sectors. There may also be changing employment densities over time. This is already recognised in the evidence base with regards to automation in some sectors, and is recognised in PPG specifically in regard to B8 uses where a wider view of future storage and distribution requirements is instructed.</p>

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			<p>4.1.5 These effects will lead to additional requirements for employment sites and premises that are not captured in the current evidence base.</p> <p>Agent Views</p> <p>4.1.6 This second issue is a specific requirement of PPG Paragraph: 031 Reference ID: 2a-031- 20190722. The Submission Draft Local Plan includes specific references to this market sentiment, as set out at paragraph 2.0.3 above, but with no action taken. The EGA also highlighted strong commercial agent opinion as summarised at paragraph 3.1.3 above.</p> <p>4.1.7 HJA has consulted with local industrial agent Robert Bradley-Smith who confirmed the views set out within the EGA remain highly relevant. Industrial, and particularly logistics demand is extremely strong and current and future requirements are expected to be ahead of past trends. The Covid-19 pandemic has accelerated the move to e-retail. The premises requirements of e-tailers and third-party logistics operators are growing rapidly. The growth is expected to continue as new market areas are added to the portfolios of e-tailers, as well as through increasing demands for ever shorter delivery times. The Gatwick area was also highlighted for its excellent location at the heart of the South East and able to service both the south coast and south London.</p> <p>4.1.8 In considering an approach aligned to the requirements of PPG, and drawing on the agent views as set out within the evidence base, there is very clear evidence of a need to provide an uplift to the stated requirements for warehousing space.</p> <p>Implications</p> <p>4.1.9 These two issues combine to indicate the overall requirement should have been subject to further uplift. The exact scale of uplift will require an element of subjectivity and particularly dialogue with a range of stakeholders active in the logistics market as well as evidence on the potential scale of losses and need for replacement. HJA has explored with West Sussex County Council's monitoring team the availability of the relevant monitoring data, and it was confirmed that not all losses of employment sites and premises are currently recorded within the data, particularly to non-commercial losses such as residential. Therefore it has not been possible to propose a scale of uplift as part of this response.</p> <p>4.2 Shortfall in Employment Land Trajectory</p> <p>4.2.1 Notwithstanding the issues set out above, Table 2.5 of the EGA update (p10) identifies a net floorspace requirement of 121,550sqm of industrial (B1c/B2/B8) Uses before the 10% flexibility allowance is applied. With the flexibility added this increases the required provision to 133,700sqm1. In land terms this equates to 33.4ha on the basis of the 4,000sqm per hectare (40%) development density assumption.</p>

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			<p>4.2.2 A shortfall in provision is identified within the Employment Land Trajectory (January 2021) which includes a total provision for B1c/B2/B8 floorspace of 118,920sqm. This falls below the total requirement including the flexibility allowance. This indicates a shortfall of 14,780sqm, equivalent to 3.7ha at the 40% development density.</p> <p>4.2.3 The trajectory document also suggests the proposed allocation at Gatwick Green will deliver 77,800sqm2 on 24.1ha. This equates to a density of only 32%. On the basis of this lower density the additional 14,780sqm would require a further 4.6ha.</p> <p>5 Conclusion</p> <p>5.0.1 Crawley is a key economic hub for a wider hinterland. The Submission Draft Local Plan seeks to plan positively for economic and employment growth.</p> <p>5.0.2 The Council's own evidence and the Submission Draft Local Plan both acknowledge the strength of market demand highlighted by commercial agents, but make no adjustment for this clear evidence of strong market signals and the specific requirement of PPG to take account of logistics needs in a more rounded way. Coupled with a failure to make any provision for replacing losses of existing employment sites and premises to other uses, and through dilapidation and changing occupier requirements, there is a clear under provision in the assessment of future needs. The scale of this uplift is uncertain.</p> <p>5.0.3 The Employment Land Trajectory set out alongside the Submission Draft Local Plan indicates a shortfall in anticipated floorspace when compared to the identified needs and the claimed capacity within the plan. The shortfall equates to a need for a further 3.7ha of industrial and warehouse land across the plan period. This could increase to 4.6ha based on the identified density at Gatwick Green.</p> <p>Table 1: Revised Industrial & Warehousing Requirement - Summary</p> <table border="1"> <thead> <tr> <th>Category</th> <th>Land Requirement</th> </tr> </thead> <tbody> <tr> <td>Current stated outstanding requirement</td> <td>24.1ha</td> </tr> <tr> <td>Employment land trajectory shortfall</td> <td>3.7-4.6ha</td> </tr> <tr> <td>Additional market and replacement uplift</td> <td>TBC</td> </tr> <tr> <td>Total</td> <td>27.8-28.7ha+</td> </tr> </tbody> </table> <p>Source: HJA based on EGA and Crawley Borough Council documentation</p> <p>5.0.4 Additional employment land provision should be made to support the needs of the Crawley Borough economy and enable it to continue to fulfil its role as a key economic hub for the wider area.</p> <p>Appendix 2: Employment Land Report by HJA (June 2023)</p> <p>1 Review of Northern West Sussex Economic Growth Assessment: Supplementary Update for Crawley Statement of Competence</p> <p>1.1 Hardisty Jones Associates (HJA) is an expert economic development consultancy with extensive experience in matters relating to employment land evidence for Local Plans. HJA frequently prepares employment land</p>	Category	Land Requirement	Current stated outstanding requirement	24.1ha	Employment land trajectory shortfall	3.7-4.6ha	Additional market and replacement uplift	TBC	Total	27.8-28.7ha+
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			<p>evidence for local authorities to inform their plan making. HJA also provides analysis for a range of clients wanting to understand the quality and robustness of evidence prepared for and on behalf of local planning authorities.</p> <p>1.2 This paper has been prepared by Stuart Hardisty. Stuart is a Director of HJA with 23 years' experience of economic development consulting and particular expertise in the area of assessing future employment land requirements. Stuart is a Fellow and Director of the Institute of Economic Development. Stuart has led numerous evidence studies on behalf of local authorities and other public bodies; he has appeared as Expert Witness to successfully defend evidence; and has written articles and spoken at conferences on the topic of employment land evidence.</p> <p>Instructions</p> <p>1.3 HJA has been instructed by W T Lamb Holdings to undertake a critical review of the Northern West Sussex Economic Growth Assessment: Supplementary Update for Crawley (Final Report, January 2023) prepared by Lichfields on behalf of Crawley Borough Council. The findings of this review will be used to inform representations to the Regulation 19 Consultation of the Draft Crawley Local Plan 2024-2040 (May 2023), (hereafter referred to as the new Local Plan).</p> <p>1.4 This review follows similar evaluations of previous reports which form part of the Northern West Sussex Economic Growth Assessment (EGA). The EGA forms part of the evidence base to the new Local Plan.</p> <p>1.5 The January 2023 EGA Supplementary Update has been prepared as a result of delays to the new Local Plan, caused by ongoing water neutrality issues in the area. Previous Reviews and Engagement with Crawley Borough Council</p> <p>1.6 In March 2021, HJA reviewed the new Local Plan and its employment land evidence as was available at the time. This was used to inform W T Lamb Holdings representations to the previous Regulation 19 Consultation¹. The review² identified a number of weaknesses in the evidence base and its failure to fully comply with the requirements of Planning Practice Guidance (PPG). In particular the review identified issues leading to an under provision of industrial and warehousing land within the new Local Plan including:</p> <ul style="list-style-type: none"> • Calculation errors in the employment land trajectory • Failure to make appropriate adjustment for the strength of market opinion, in line with the advice of PPG; and • Failing to ensure sufficient provision to replace losses of employment space to other uses³. <p>1.7 The previously submitted note is appended for ease of reference.</p> <p>1.8 HJA, alongside W T Lamb Holdings and LRM Planning has also participated in meetings with Crawley Borough Council in April 2021, November 2021 and November 2022 to explain our concerns regarding the evidence base. This engagement included an open offer to discuss our concerns with the authors of the EGA,</p>

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			<p>with a specific offer in advance of the authors preparing the January 2023 Supplementary Update. This offer has not been taken up by Crawley Borough Council or the EGA authors.</p> <p>Overall Conclusions of the EGA Supplementary Update</p> <p>1.9 The EGA Supplementary Update concludes that there is a reduced requirement for employment land across Crawley Borough⁴ when compared to previous editions. This is based on revised economic forecasts which include lower levels of employment growth and a change in the historic time period over which past trends are analysed (now incorporating the Covid-19 impacted years).</p> <p>1.10 Whereas the previous study identified a total requirement of approximately 40ha, this has now reduced to 26-32ha across the borough. The shortfall, after adjusting for existing supply, falls from around 24ha to 11-17ha.</p> <p>1.11 In response, the new Local Plan has reduced the size of allocation at Gatwick Green⁵.</p> <p>Methodology of the EGA</p> <p>1.12 The January 2023 EGA update applies a largely similar methodology to that used in the original Economic Growth Assessment (January 2020) and its previous update (September 2020). The update is partial, and draws on revised economic forecasts and updated historic monitoring records. It also considers a revised time period of 2022-2040⁶.</p> <p>1.13 The methodological issues highlighted in previous critical reviews therefore remain. These are:</p> <ul style="list-style-type: none"> • Failure to consider gross rather than net completions in historic projections; • No meaningful consideration of replacement requirements; • No meaningful uplift for market sentiment or historic suppressed supply; and • No wider consideration of the logistics sector as required by Planning Practice Guidance⁷. <p>Response to Previous W T Lamb Submissions to Crawley Borough Council</p> <p>1.14 There is no evidence that any of the points made on behalf of WT Lamb previously have been materially addressed in the January 2023 update. As noted above, this includes ignoring the offer to engage with the EGA authors to discuss and explain our concerns. Detailed Issues</p> <p>1.15 The following issues have been identified as a result of the review of the January 2023 EGA update. Implications of the Covid affected time period</p> <p>1.16 Relying on employment data and commercial development data relating to the time period most substantially affected by the Covid-19 pandemic and the related public health restrictions on activity brings risk. As part of the EGA update the 10 year time period for historic analysis has been rolled forward. This now includes the pandemic period. The pandemic was a highly atypical event which has the potential to impact data</p>

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			<p>which is used for the purposes of long term policy planning. In particular, overall employment data for Crawley is substantially affected as a result of the impact on air travel and therefore Gatwick Airport.</p> <p>1.17 Inclusion of these data has a depressing effect on the overall analysis.</p> <p>Treatment of negative forecast employment change</p> <p>1.18 The economic forecasts relied upon within the analysis include reductions in employment for activities within light and general industrial property typologies. This leads to a negative requirement for such uses (see paragraph 2.28)8. However, the report notes that the light industrial property typology has been a key driver of new development in Crawley (see paragraph 2.34). This historic activity has been during a period when employment data would also suggest decline. This highlights a key methodological weakness which has been repeatedly stated in HJA's reviews of previous EGA reports. There has been a failure to take a rounded view based on all the evidence. Planning Practice Guidance suggests consideration of a range of evidence including economic forecasts and market based indicators. The employment topic paper9 also highlights the strong market sentiment yet makes no adjustment to the quantum of land required.</p> <p>1.19 HJA's extensive experience in this field of work has repeatedly found similar trends to that identified in the EGA across other locations. Whilst employment related to light and general industrial property typologies has been in decline for many years, demand for such property remains strong. This is a result of the need to replace stock that is lost from these uses to other activities due to either demand for alternative uses, or due to properties moving beyond their useful economic life or not being suitable to meet modern occupier requirements. The need for sufficient allowance for 'replacement demand' is therefore critical to ensure planning policy does not hamper the future performance of the economy. The treatment of replacement demand within the EGA is inadequate.</p> <p>1.20 Overall this methodological weakness leads to an under estimate of the future need for light and general industrial sites and premises.</p> <p>Adjusting for historic constraints</p> <p>1.21 The EGA update explicitly acknowledges that historic supply may have been constrained (see paragraph 2.32). This is also highlighted within the employment topic paper (including paragraphs 4.66 NS 4.72). On this basis it is reasonable to infer that historic activity levels could have been suppressed as a result of this constraint. In fact this is explicitly stated in the topic paper. Any projection forward relying on historic activity levels is therefore at risk of underestimating true demand, with upward adjustment required. However, no such adjustment has been made.</p> <p>1.22 Forward projections are also at risk of being suppressed through including two years' of data affected by the Covid-19 pandemic as noted above. The EGA update draws on the period 2011-21.</p>

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			<p>1.23 Overall this failure to adjust the assessed need for the identified historic constraints will under estimate the need for future employment sites and premises. The new Local Plan is therefore failing to plan positively. Aligning to future labour supply Methodological absurdity</p> <p>1.24 The approach to considering the employment sites and premises requirements arising from higher growth in future labour supply is fundamentally flawed (see EGA paragraph 2.35). The method adopted by the authors of the EGA effectively exaggerates negative trends. As such, the adjustments made to address the fact that labour force growth is likely to outstrip labour demand (i.e. modelling an increase in employment to balance the labour market), leads to a larger decrease in the need for light and general industrial sites and premises. This is nonsensical. Higher population will drive additional demand for services and create the potential for increased business start up and growth. In no way will an increased population and labour force accelerate the decline of any particular sector. The effect of this is to falsely reduce the assessed demand for light and general industrial property.</p> <p>1.25 In order to explain in more detail. Under the 314 dwelling per annum (dpa) scenario there is broad alignment between the demographic analysis and the economic forecasts. However, for the 544 dpa scenario this is not true. The EGA is clear that the higher dwellings scenario will drive additional employment requirements, and hence additional sites and premises requirements. Yet the assessment finds to the contrary in the case of light and general industrial.</p> <p>1.26 The result of this methodological weakness is to reduce the level of light and general industrial need under the higher dwellings scenario. Meeting demographic and housing need</p> <p>1.27 Further to the above, the new Local Plan makes provision for 314dpa within Crawley Borough. On this basis one might presume the comments above relating to a higher housing and labour force/population scenario are irrelevant. However, the new Local Plan and its evidence base is clear that there will be significant unmet housing need, with a standard method derived need of 755dpa. How this will be met in full is unclear, although reference to urban extensions outside the Crawley borough area, but functionally part of Crawley are addressed. Within the EGA update employment needs for a higher housing figure of 544dpa are set out (based on scenarios initially considered within the housing and employment evidence base in 2020). However, no additional employment land allowance is provided for within the new Local Plan on this basis. The Plan draws on figures from options broadly aligned to the 314dpa scenario.</p> <p>1.28 It is clear that Crawley is the key economic hub of the sub-region and at the heart of the functional economic market area (FEMA). For that reason, the employment sites and premises requirements associated with that higher level of housing need will also need to be provided within the area; and given Crawley's role, it would be reasonable to expect the lion's share of this need to be located within Crawley. However, there</p>

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			<p>appears to be no adjustment made to capture any of this need within Crawley. The additional requirement associated with the 544dpa scenario is assessed as 42.9ha (as per Table 2.1410).</p> <p>1.29 The employment topic paper (paragraph 4.69) notes that the majority of this demand is expected within the transport and logistics sector. It also notes that there are no other strategic employment sites proposed in the northern west Sussex area to meet the needs of this sector. In which case, the identified demand will go unmet.</p> <p>1.30 Whilst the employment topic paper considers the transport and logistics sector in more detail, highlighting the strong levels of demand nationally, regionally and locally. The provision of capacity at Gatwick Green within the new Local Plan only meets the minimum level identified based on the 314dpa scenario and makes no attempt to meet any of the identified unmet needs within the sub-region.</p> <p>1.31 In addition, no consideration of the employment sites and premises requirements associated with the remaining unmet dwelling need¹¹ is made at all.</p> <p>1.32 Even if additional housing is not provided in full that does not mean that the population that would be resident within such housing will not be resident within the area. Whilst there may be some constraint on migration, there will also be a limitation on new household formation or increased levels of living within sub-optimal accommodation. Therefore the employment need, and the associated sites and premises requirements do not disappear.</p> <p>1.33 On the basis of the evidence presented there is an under provision of employment sites and premises, particularly in the transport and logistics sector to meet the needs arising from higher housing requirements which will be met elsewhere in the sub-region.</p> <p>Providing a buffer</p> <p>1.34 In our previous reviews we have repeatedly identified the need to address the necessary uplifts to address replacement demand and wider market issues. These have not been adequately addressed or considered.</p> <p>1.35 Within the latest EGA update a 'buffer' of 10% is applied (see paragraph 2.40) to address:</p> <ul style="list-style-type: none"> • Replacement of some ongoing losses; • Delays to sites coming forward; and • Other relevant factors in the local market. <p>1.36 In HJA's opinion this is clearly inadequate to deal with such significant issues. Particularly given the evidence presented elsewhere in the EGA (in the latest Update and the previous reports). In particular the issues of historic constrained supply, strong market sentiment and a failure to properly provide for losses of employment sites and premises¹².</p>

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			<p>1.37 Assessment of replacement needs should be based on existing stock, and potential losses thereof, rather than a proportion of future requirements.</p> <p>1.38 On the basis that commercial properties are developed with an anticipated useful economic life of 35 years one might reasonably expect replacement of commercial property to average out at ~3% per annum¹³. In HJA's work for local authorities we acknowledge that such an assumption may often be too strong, given that in reality some premises are used well beyond 35 years. A figure of 1-2% of stock per annum is therefore typically adopted as a starting assumption for testing, with the final assumption informed by available evidence and local market opinion on the age, quality and condition of existing stock. Property that is typically used well beyond its 35th anniversary is often very old stock (e.g. Victorian) that has been very robustly built.</p> <p>1.39 It has been indicated in other New Towns that much of their commercial property is approaching (or beyond) the end of its useful life and will require replacement within the next 10-20 years. New Towns also are absent the historic property that has shown the capacity to be used well beyond the 35 year threshold. For this reason the level of replacement in Crawley, as a New Town, is potentially higher than 1-2% per annum.</p> <p>1.40 If 2% per annum is considered a minimum level, equivalent to replacing property every 50 years on an ongoing basis; over the 16 year plan period this would equate to a baseline level of replacement of 32% of existing stock, and potentially higher¹⁴. This is clearly well above the 10% uplift applied only to the estimated future requirements provision. Nevermind the fact that this 10% uplift has been included to cover not just replacement but a range of other factors as well.</p> <p>1.41 Without sufficient provision for replacement there is a significant risk that the Crawley borough economy will not have sufficient employment premises to operate effectively. The remedy is an uplift to the provision for employment property across all Use Classes.</p> <p>Conclusions</p> <p>1.42 HJA's review of the EGA Update has found that there are multiple weaknesses in the EGA methodology. There have been no material changes to the approach despite the points made in previous representations and meetings with the Council. The offer to engage with Lichfields to explain the concerns as previously expressed has not been taken up.</p> <p>1.43 It is HJA's view that the EGA makes an underestimate of the true PPG compliant requirement based on both the evidence presented within the EGA itself, and weaknesses in the methodology employed.</p> <p>1.44 It remains HJA's view that is incumbent upon Crawley Borough Council to ensure that its new Local Plan is founded on a sound evidence base in order to be found sound at Examination. On the basis that the evidence on which key policies within the plan relies is not sound the Plan itself is not sound and will require modification to</p>

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			<p>ensure sufficient provision of employment land to meet the needs of the Crawley economy throughout the plan period.</p> <p>1.45 As set out in this paper the effects are across all employment Use Classes (in terms of replacement) but more specifically within the light and general industrial; and transport and logistics sectors.</p> <p>1.46 The employment topic paper makes clear that Crawley acts as a key employment hub for the sub region; that there remains strong demand; that there has been historic constraint; and that there are no other strategic employment allocations within the sub region. However, the only additional allocation within the new Local Plan has been reduced in scale to 14ha. This fails to address any of the identified issues which actually confirm the assessed need to be an under estimate.</p> <p>1.47 The analysis above has identified a series of methodological issues that would need to be rectified in order to comment in detail on the quantitative position, making provision for the higher dwelling scenario might be considered a minimum level, with an unmet industrial and warehousing requirement of 48ha, requiring an additional 34 ha to be provided.</p> <p>Suggested Modifications: CHANGES REQUIRED IN ORDER TO ENSURE THAT THE PLAN IS COMPLIANT WITH NPPF 56. Whilst we are supportive of the general approach of the Council in seeking a strategic allocation at Gatwick Green, currently the plan is contrary to National guidance, it does not:</p> <ul style="list-style-type: none"> • reflect the most up to date trends or market signals; • rely upon a robust evidence base rather there are numerous and significant methodological failings within the updated EGA; • proactively and positively encourage sustainable economic growth with regard to Local Industrial Strategies and other policies for economic development; • identify strategic sites for local and inward investment to match the strategy and to meet anticipated need; or • provide flexibility to accommodate needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances. <p>57. Based on the analysis undertaken by HJA and in order to achieve the vision of the plan and to comply with National guidance the level of Industrial land required over the plan period should be increased significantly. Indeed, HJA consider that there is a need for 48ha employment land, given the “opportunities” identified in the Employment Trajectory, then as a minimum the plan should identify 34ha of land (approximately 102,000 sqm of floorspace). This would contribute to a more appropriate supply of land and will reflect local circumstances as required by national guidance. It would also help to ensure diversification of the local economy and move away from reliance upon Gatwick Airport.</p>

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			<p>58. As such in order to make the plan sound, as a minimum the following amendment to Policy EC1 is required with further uplifts once the methodological weaknesses have been addressed.</p> <p>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.</p> <p>There is need for a minimum of 48 hectares new business land in the borough which, taking off the opportunities identified in the Employment Land Trajectory, results in an outstanding requirement for a minimum 34ha (approximately 102,000 sqm) industrial and warehousing land over the period to 2040.</p> <p>Crawley's recognised economic role and function will be maintained and enhanced through:</p> <ul style="list-style-type: none"> 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) v) Allocation of an industrial-led Strategic Employment Location at Gatwick Green, on land east of Balcombe Road and south of the M23 spur.
REP/033 (2023)	Horsham District Council	EC1	<p>Strategic Policy EC1: Sustainable Economic Growth We support this policy in principle but believe that its effectiveness could be improved</p> <p>We note that the focus of new land allocations is to provide industrial units at Gatwick Green, whereas mixed business growth will be supported at Manor Royal and at existing employment sites. This is likely to complement Horsham's employment strategy which supports smaller business spaces and start-ups. We envisage that the two authorities will continue to work closely to ensure appropriate economic growth strategies in our respective areas as HDC may have the ability to meet some of Crawley's unmet needs as we have a surplus of economic land supply.</p> <p>Notwithstanding the above, we do have concerns with the final sentence of paragraph 9.22 that suggests that the development West of Ifield development will provide two hectares of employment land. As we express in response to other sections of the plan, no decision has been made to allocate this site in the Horsham District Local Plan. Therefore at this stage it is not possible for the Crawley Local Plan to set out how much employment</p>

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			land may be included within any potential allocation. We therefore request that in order for the plan to be effective, the following change is made: Suggested Modifications: Changes sought: We seek the removal of wording that can be interpreted as suggesting that the West of Ifield site would be allocated and that the amount of employment land has been determined.
REP/035 (2023)	Vail Williams on behalf of Ardmore Ltd	EC1	<p>Strategic Policy EC1: Sustainable Economic Growth The May 2023 SA confirms that employment and growth are a key factor for the resilience and growth of the town under the Local Plan Review.</p> <p>Regarding Economic Growth, it states in para 6 that “<i>Crawley is firmly established as one of the key economic drivers in the Southeast of England, representing the geographic and economic heart of the Gatwick Diamond and wider Coast to Capital Local Enterprise Partnership area. The town’s economy is generally strong with total employment in the town being around 100,000 jobs and, although the COVID-19 pandemic impacted significantly on the borough’s aviation-led economy, Crawley is recovering well economically. With the economy forecast to consolidate and grow over the Plan period to 2040, new business land and floorspace is identified.</i>”</p> <p>We would however argue that insufficient new business land is identified to reflect the role and function of the town within the wider region.</p> <p>In the May 2023 SA, the Council’s site assessment of Jersey Farm acknowledges that the “<i>site is a logical extension to MR</i>” under objective 1.</p> <p>The SA also recognises that “<i>There is significant in-commuting to the town, and on average people who travel into Crawley for work earn more than people who live within the borough. Many residents are employed in lower-paid industries, and addressing the local skills gap to increase opportunities for Crawley residents is a priority.</i>” This confirms, consistent with Policy EC5 on skills that local employment opportunities are essential to the Local Plan Review.</p> <p>Topic Paper 5: Employment Needs and Land Supply May 2023 confirms that the Local Plan Employment policies are under pinned by the Northern West Sussex Economic Growth Assessment (January 2020) and its Crawley focused updates (September 2020 and January 2023, and the Employment Land Availability Assessment. An updated Employment Land Trajectory (Base Date 31 March 2023), sets out the employment land supply pipeline, as planned for through the LPR.</p> <p>Para 2.5 of Topic Paper 5 confirms that Crawley’s economy has proven to be resilient and continues to trend towards recovery, post Covid pandemic, and that the councils own “<i>One Town Crawley Economic Recovery Plan</i>” (2021) identifies interventions to support the economic recovery of Crawley, and to future proof its economy so that it is better able to adapt to unforeseen change. It clearly states that “<i>Key to this is the unlocking of sufficient suitable employment land to provide for employment growth sectors and boost jobs for residents,</i></p>

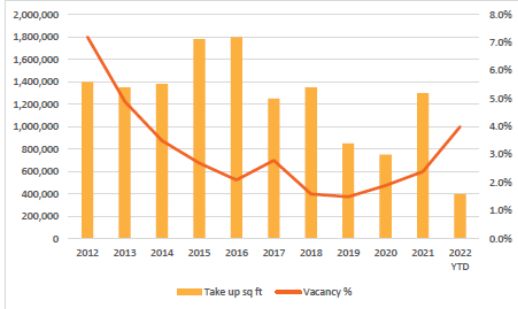
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			<p><i>increasing the borough's overall economic resilience, supporting a green economy, and promoting skills development...".</i></p> <p>Para 2.6 continues that while “<i>there remains need for new business land and floorspace over the forthcoming Plan period. Given what are 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</i>”. We do not consider that the council have properly considered sustainable opportunities for employment on the edge of Manor Royal by use of a more flexible approach to airport safeguarding (GAT2) and the alignment of the CWMLL (ST4).</p> <p>Para 3.10 of the Topic Paper 5 confirms that the adopted Local Plan (2015) planned for a baseline need of 57.9 hectares new business land in the Borough over the Plan period to 2030, but only 23 hectares of business land was identified, through reuse and intensification of sites within the existing main employment areas. This does not accept any potential gain from a proper “no stone untuned” approach (see above) on the edge of Manor Royal.</p> <p>The 2015 Local Plan resulted in an unmet business land requirement of 35 hectares over the adopted Plan period 2015-2030. This has frustrated local markets and potential investors and developers looking to grow and locate in the town.</p> <p>Whilst the Councils Topic Paper 5 states that HOR9 under Reigate and Banstead’s Development Management Plan 2019 meets some unfulfilled need, this allocation is still not forthcoming and does not address fully local mixed employment needs. Indeed, the required SPD for the site by RBBC has also not been drafted nor adopted and therefore the 4-year delay to any delivery must be a factor in considering the increasingly frustrated and declining opportunities for employment growth in the Northern West Sussex Region, and immediately adjacent to Crawley and Gatwick Airport.</p> <p>However, we do not agree that this is resolved through the proposed allocation at Gatwick Green which is in such a disparate and poorly related location from Manor Royal, within the safeguarded area currently identified for airport related car parking (as encouraged by GAT3) and with such a significant impact on highways, countryside, and noise environment etc.</p> <p>Regarding CBCs own evidence base, as with the Adopted 2015 Local Plan, Lichfield’s Northern West Sussex EGA, looks at market constraints and opportunities for CBC alongside HDC and MSDC. For the CBC Local Plan Review the 2018 Lichfield’s report and various updates reconfirm that B8 requirements were similarly constrained and remain unmet across the town, with a low rate of vacancy across existing stock.</p>

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			<p>Para 4.5 of the Topic Paper also recognises that <i>“the 2018 market analysis identified a particular gap in the supply of smaller industrial ‘starter units’ ranging in size from 400-500sq ft and ‘move on’ space. At the larger scale end of the market, industrial units over 20,000sq ft are found to be in short supply.”</i></p> <p>We do not believe that Gatwick Green under EC4 adequately addresses the ability to provide SME opportunities as well as larger industrial units. We agree that under EC2 opportunities to extend Manor Royal should remain the focus for employment generating development in the Local Plan Review.</p> <p>The 2018 Lichfield study and updates also highlight that a focus on development should be at Manor Royal given its key advantages, and describes them as <i>“its strategic access links, variety and mix of uses, and a developing business community through the work of the BID.”</i> It also recognises that <i>“Access to amenities and landscaping are identified as areas for improvement, with the absence of a centralised amenity hub to meet the needs of businesses and employees representing a disadvantage in comparison to competitors.”</i> We consider that increased qualitative improvements could be made through further development and the expansion of Manor Royal.</p> <p>The July 2019 update of the NWS EGA stated that between 44.6 and 57.63 hectares of land would be needed between 2020-2035. With only 13.19 hectares available the council themselves identified an area of search to be explored. Topic Paper 5 confirms the aim of this approach. <i>“With much of this land subject to safeguarding for a possible southern runway at Gatwick Airport, the initial draft Plan set out that work to identify a new Strategic Employment Location would only take place once the status of safeguarding had been clarified.”</i></p> <p>Para 4.10 also confirms that <i>“The Council considered that Aviation 2050 (December 2018), the government’s draft Aviation Strategy, did not provide a definitive steer as to whether or not the council would be required to safeguard land moving forward.”</i></p> <p>Our clients made formal representations to the government on the Aviation Strategy 2050 and particularly the emphasis on local LPAs to make informed decisions themselves <i>“on the future needs of airports and associated surface access requirements, when developing local plans.”</i></p> <p>Lichfield has subsequently revised more EGA updates, including January 2020 to support the regulation 19 July 2020 Local Plan Review. It suggested planning for economic growth based on the Past Development Rates requirement of 33ha new business land over the Plan period, with an available land supply pipeline at the time of 12ha as supported by the Employment Land Trajectory, December 2019, a 21-hectare deficit.</p> <p>Despite the council at this time suggesting an Area Action Plan for part of the Local Plan to determine the scope of additional employment land, this approach was then advised against by a PINS inspector at an advisory meeting in April 2020. The call for sites from CBC in their previous approach to identify an Area of Search, and a subsequent Area Action Plan (AAP) identified 140 hectares of additional land within the area of search identified</p>

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			<p>in the Regulation 18 version of the Local Plan Review. When commenting on the PINs informal advice CBC stated that <i>“The inspector advised that an approach of planning for need based on past development trends would not necessarily enable the requirements of new and changing employment sectors to be accommodated”</i>.</p> <p>A September 2020 Crawley focused EGA was also undertaken given the impact of COVID and these new scenarios generated employment land requirements that range from 22ha to 57ha. This new assessment of the Crawley EGA 2020 identified a need for a minimum of 38.7ha of new business land over the Plan period. This figure can be broken down into an office land requirement of 5.9ha and an industrial land requirement of 32.8ha.</p> <p>In the Council’s evidence base, a further Employment Land Demand/Supply Balance study (January 2021) state that office demand could be met, but there would be an increased deficit of B8 floorspace of c 24ha. It also confirms that many of the sites under the call for sites (para 4.56) <i>“would prejudice the potential future delivery of a southern runway at Gatwick Airport should this be required, contrary to national policy. Therefore, as required by national policy, land to the south of Gatwick Airport continues to be safeguarded and cannot be considered for strategic employment at this time”</i>.</p> <p>Para 4.56 confirms CBC believe that <i>“Only one of the sites promoted for employment is considered capable of providing the required quantum of business land in a manner that would not prejudice future delivery of a southern runway at Gatwick Airport should this be required by national policy. This is the land east of Balcombe Road and south of the M23 spur, referred to as Gatwick Green.</i></p> <p>The final Regulation 19 evidence base documents are the EGA Supplementary Update for Crawley (January 2023) and the Employment Land Demand/Supply Balance (January to May 2023). These state that based on the 2022 Q4 Experian forecast, the Crawley EGA 2023 identifies the need for a minimum 26.2ha new business land over the Plan period. This can be broken down into an office (E(g)(i)/E(g)(ii)) land requirement of 3.3ha and an industrial (E(g)(iii)/B2/B8) land requirement of 22.9ha.</p> <p>The ELT March 2023 update shows a +2.02 hectare of office floorspace oversupply and a 13.73 deficit of industrial land.</p> <p>On behalf of our client, we dispute that the allocation at Gatwick Green is consistent with the GAL 2019 Masterplan or objectives of the EGA and disagree that the land supply figures of January 2021 remain appropriate, namely that all office provision is accommodated, (especially given any light industrial, manufacturing requirement), or that there is only 13–24-hectare range of additional B8 floorspace required.</p> <p>We believe the evidence base does not adequately reflect the prosperity of the town, its rapid recovery since COVID, nor the increase in demand over the plan period to 2040. As local land agents, Vail Williams consider the growth scenarios to be unambitious for such a regional hub and that should land become available, significant demand is now pent up. We contest that a more pragmatic and balanced approach to employment</p>

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			<p>demand and supply is required, that aims to locate adequate employment space within Crawley and within the Manor Royal Main Employment Area. We therefore consider rather than the current policy position is unsound and contrary to Policy EC3, and EC4 allocation and is flawed.</p> <p>We believe that to understand this further, additional assessment of local market conditions is required to assist the Inspector ahead of an Examination hearing, as the council's ELT has both historically and recently identified a shortfall of B8 warehousing and to a lesser extent, industrial accommodation. As local agents, Vail Williams would like to provide the following market context to support our submission that EC1 and EC4 are flawed and unsound require additional consideration.</p> <p><u>Vail Williams Market Context on EC1 to EC4:</u></p> <p>To support EC1 on Sustainable Economic Growth we would agree that the commercial property market has seen significant volatility because of the COVID-19 pandemic. The warehouse market, however, has remained robust, driven by a change in shopping habits with more people now favoring online shopping. What followed as a result was significant demand from Third Party Logistic (3PL) operators and online retail businesses. The industrial sector has also been strong when compared to a poor B1 office market but nowhere as buoyant as the B8 sector.</p> <p>Demand from B8 operators has put strain on the supply of existing industrial/warehouse market, with developers focusing on providing B8 schemes due to the higher returns, which has meant many traditional light industrial businesses have also had limited options to move to, mainly on grounds of rents being too high, or the suitability of new B8 buildings for Class Eg(iii) light industrial use.</p> <p>With the evolving environmental, social, and governance (ESG) landscape, we are also seeing industrial and manufacturers progressing towards their ESG commitments by making operational changes, with relocation to more energy efficient buildings and better working place for staff. As a result, Vail Williams expect to see the highest demand for new units which have the ESG benefits, with a continued occupier <i>'flight to quality'</i>.</p> <p>The primary focus of recently completed and forthcoming developments (see ELAA section below) is geared toward 'mid-box' B8 occupiers, in the region of 50,000 sq ft (4645 sq m) +/- 15,000 sq ft (1,393 sq m).</p> <p>EC1 - Take Up & Demand</p> <p>Policy EC1 confirms that <i>"Crawley's role as the key economic driver for the Coast 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 113,390sqm (26.2 hectares) new business land in the borough which, taking off the opportunities identified in the Employment Land Trajectory, results in an outstanding requirement for a minimum 41,315sqm (13.73 hectares) new B8 industrial, principally storage & distribution land over the period to 2040."</i></p>

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			<p>We disagree that this is an appropriate or justified approach and note that it is also inconsistent with the 2015 Inspector 's report that acknowledged the extent of the constraint 8 years go and required a “<i>no stone unturned approach</i>”.</p> <p>To assist, the table below sets out vacancy rates for the Sussex, Gatwick, Brighton region from 2012 to 2022.</p>  <p><i>(Table 1)</i> Source – DTRE</p> <p>Vail Williams has records of industrial and warehouse take-up over a 7-year period for units above 10,000 sq ft (929 sq m), within the immediate Crawley catchment. Our records show take-up has varied from a high of 463,000 sq ft (43,000 sq m) per annum in 2021, to a low of 111,000 sq ft (10,300 sq m) in 2017. This data does not capture smaller lettings/sales but is a useful guide. It is also relevant to note that in the absence of a reasonable supply of new stock, take-up rates will be suppressed, and Crawley has suffered from a lack of new developments over several years. The average annual take-up over this period was approximately 284,000 sq ft (26,400 sq m) per annum.</p> <p>Suppressed provision will therefore adversely affect the ability for the town to continue to maintain its strong economic function in the region as required by EC1 and in the absence of modern fit for purpose units being built take up rates will be further suppressed.</p> <p>From the evidence base supporting the Local Plan Review, the ELAA (March 2023) analyses Office and Industrial land options, with specific sites identified/categorised as being suitable for Office or Industrial use. Whilst we acknowledge that B8 and B2 uses are included within ‘<i>Industrial</i>’ we would comment that it is not clear where light industrial (Egiii or old use class B1c) uses are considered. We believe that historically B1c had been grouped within B1 in ELAA assessments, so there is a risk that the supply needs for Industrial land is under catered for, however we would welcome confirmation that this is or is not the case.</p>

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Crawley's ELAA's have historically and recently identified shortfalls of B8 warehousing land. Vail Williams agree with this historic shortfall of B8 space but as mentioned above, recently several significant sites have been developed in the immediate catchment for B8 mid box units as below:

Availability (New build and immediate pipeline) table (table 2).

New Speculative Developments	Total Size Sq Ft	Rent (PSF)	Status
Arrow Point (Churchill Ct), Crawley	85,000	£15.50	Built and ready for occupation
G-Hub, Napier Way, Crawley	164,000	£15.50	Built and ready for occupation
The Base, Fleming Way, Crawley	235,000	£15.50	Construction complete. Lettings being sought
Panattoni Park, Fleming Way, Crawley	200,000	Not quoting	Planning submitted. Pre lets being sought
Crawley District Sub-total	684,000 sq ft (63,545 sq m)		
Panattoni Park, Burgess Hill (Formerly The Hub)	300,000	£15's	Planning granted. Construction started. Pre lets being sought
Nowhurst Business Park, Horsham	290,000	£12.00 – 13.00	Pre lets sought from circa 100,000 sq ft
Midpoint 23, Pease Pottage, Crawley	86,000	£13.50	Construction complete. Only one unit left.
Titan/Saga site Salfords, Redhill	84,000	£15's	Planning secured for 84,000 sq ft. Pre lets sought
Frontier Park, Southwater	40,000	£13's	Planning for seven new units – PC Q3 2023
Sussex Junction, Bolney	46,500	£13.00 - £15.00	Built. Part let /part under offer
Wider catchment Total	1,530,500 sq ft (142,186 sq m)		

(Table 2)

There are other proposals “*in the planning pipeline*” including St Modwen’s for another large B8 unit at junction 9 M23 currently under construction, and schemes in Southwater proposed by Graftongate and Chancerygate. Each development could provide individual schemes of 100,000 sq ft (9,290 sq m) or more.

The above table shows circa 1,530,500 sq ft (142,186 sq m) of available new build accommodation or immediate pipeline, in the wider catchment. Approximately 684,000 (63,545 sq m) is located on Manor Royal, and there is currently occupier interest in some of the above units.

The ELAA identifies several potential Industrial sites, with Gatwick Green being the only site ‘allocated’ with an indication of 160,000 sq m of Industrial space. The only unallocated site of scale with a quantum of floorspace shown on the ELAA is Land to the north and south of Hydehurst Lane, which ABRDN are promoting for circa 74,000 sqm.

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			<p>Should policies ST4 and GAT2 be amended (see above), then Jersey Farm would be the next largest site with potential for 40,372 sq m as per our illustrative Masterplan. We note that from the SA the council comment that the Land North and South of Hydehurst Lane, the Abrdn site is also constrained by Airport safeguarding and not considered of scale to positively score against infrastructure provision objective 8. Jersey Farm would be the next largest site with potential for 40,372 sq m GEA on 17.2ha.</p> <p>Vail Williams consider the potential provision of Industrial accommodation land to 2040 as inadequate to comply with Policy EC1, based on our analysis of annual take-up in the immediate Crawley catchment at circa 26,400 sq m per annum. We consider this take-up rate as a 'suppressed' figure due to periods of poor availability. It is also relevant to consider that if allocated, there is a high probability that Gatwick Green will attract national distributors requiring scale, i.e., major online distributors such as Amazon, or other retail distributors, who could easily acquire 200,000 to 300,000 sq m in a single unit. In our opinion, if large strategic sites such as this secure planning, take-up in Crawley District would easily be 30,000 sq m per annum or more.</p> <p>Our high-level analysis is set out below (Table 3):</p> <table border="1" data-bbox="705 718 1317 944"> <thead> <tr> <th>Potential Supply</th> <th>Crawley District</th> <th>Years' supply (assuming 26,400 sq m per annum take-up)</th> <th>Years' supply (assuming 30,000 sq m per annum take-up)</th> </tr> </thead> <tbody> <tr> <td>Existing New Build Stock or in pipeline</td> <td>63,545 sq m</td> <td>2.4</td> <td>2.1</td> </tr> <tr> <td>Pipeline (Allocated Gatwick Green)</td> <td>160,000 sq m</td> <td>6</td> <td>5.3</td> </tr> <tr> <td>Possible pipeline (Abrdn)</td> <td>74,000 sq m</td> <td>2.8</td> <td>2.5</td> </tr> <tr> <td>Possible pipeline (Jersey Farm)</td> <td>40,372 sq m</td> <td>1.5</td> <td>1.4</td> </tr> <tr> <td>Total</td> <td></td> <td>12.7</td> <td>11.3</td> </tr> </tbody> </table> <p><i>(Table 3)</i></p> <p>In comparison, in the supplementary update in the EGA dated January 2023, past take up rates for all types of space are quoted as 22,930 sq m for office and R&D and 110,210sq m for B2 and B8 totalling 133,140 sq m.</p> <p>There are 16.5 years to 2040, so it is clear from the table above that even if both Abrdn and Jersey Farm were allocated, further Industrial land is needed.</p> <p>Indeed, even if the plan allocates all sites, then we have only 11-13 years supply. The approach to retain GAT2 safeguarding and not use ST4 as an opportunity to release land on the edge on Manor Royal, therefore, will result in significant constraint to growth contrary to Policy EC1 and objective 5 to maintain and support the economy of the May 2023 SA.</p> <p>To provide additional context around Policy EC2 which aims to focus development in the Main Employment Areas, even prior to the pandemic, the opportunity for freehold industrial/warehouse buildings for owner occupiers was scarce. It is relevant to note that all the sites mentioned in Table 2 are currently being offered on a</p>	Potential Supply	Crawley District	Years' supply (assuming 26,400 sq m per annum take-up)	Years' supply (assuming 30,000 sq m per annum take-up)	Existing New Build Stock or in pipeline	63,545 sq m	2.4	2.1	Pipeline (Allocated Gatwick Green)	160,000 sq m	6	5.3	Possible pipeline (Abrdn)	74,000 sq m	2.8	2.5	Possible pipeline (Jersey Farm)	40,372 sq m	1.5	1.4	Total		12.7	11.3
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			<p>leasehold basis. The Jersey Farm development is intended to be available on both a leasehold and freehold basis, offering occupiers freehold turn-key tenure or freehold speculative units, as evidenced by our client's freehold sale of Site A in 2022 to Philip Dennis Food Services.</p> <p>Relevant to focusing development in the Main Employment Areas, it is also important to note the recent supply identified on Table 2 addresses the immediate shortfall of supply for mid box units over c50,000 sq ft (4645 sq m), but within Crawley district there are significant gaps in provision for new industrial units and smaller B8 units.</p> <p>Traditionally, the occupier market tended not to differential between warehouse (B8) and industrial (Eg(iii) and B2) uses, providing parking standards can be met and a change of use secure if needed. However, a significant element of the recent speculative B8 development is targeting logistic occupiers, so some industrial users may struggle to find suitable buildings despite the high supply in B8 units.</p> <p>There is limited provision of new smaller units, below c15,000 sq ft (1400 sq m) being provided or coming through the pipeline. Therefore, in the short to medium term (next 5 years), Vail Williams anticipate a shortage of traditional industrial units across the size spectrum, with extreme shortages of smaller industrial and warehouse units, below c1,400 sq m.</p> <p>We also anticipate a general shortage of new industrial units due to the rental values being the same as warehousing, yet those units need more parking spaces for planning, meaning they are less valuable for developers to build.</p> <p>Therefore, we believe the allocation under ST4 at Gatwick Green does not reflect or make adequate provision for the type, location or landlord structure that is required in the town and fails to be consistent with EC1 and EC2 of the Local Plan Review.</p> <p>Our illustrative masterplan 0390-RDJWL-ZZ-XX-DR-A-0058-S3-P2 illustrates how an indicative layout specifically addresses this need for smaller units, including Egiii users, and is likely to provide for smaller occupiers when compared with Gatwick Green under ST4, more closely aligning with market demand in a location consistent with EC2, whereas Gatwick Green would be more likely to attract and be most profitable for both 'mid box' (sub 10,000 sq m) and 'big box' B8 (20,000 sq m plus) B8 occupiers.</p> <p>Suggested Modifications:</p>

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REP/053 (2023)	Quod on behalf of Barker Trust		<p>DRAFT CRAWLEY BOROUGH LOCAL PLAN REVIEW - REGULATION 19 DRAFT SUBMISSION LOCAL PLAN 2023</p> <p>1 Introduction</p> <p>I write on behalf of my client, abrdn UK Real Estate Fund, in partnership with the Barker Trust (jointly referred to as the “Landowners”), to submit representations to the Regulation 19 Draft Crawley Borough Local Plan (May 2023) (hereafter the “Draft Local Plan 2023”).</p> <p>The Landowners are promoting a c.18ha parcel of land immediately adjacent to Hydehurst Lane (hereafter referred to as the “Site” and identified in a plan at Document 1) for employment uses to assist in meeting the substantial evidenced employment need forecast within the Borough. The redevelopment of the Site would deliver a logical and coordinated extension to the Manor Royal Business District, which continues to be identified in the Draft Local Plan 2023 (and its supporting evidence base) to be the key business location for Crawley at the heart of the Gatwick Diamond and Coast to Capital areas.</p> <p>The Site is available and deliverable and as detailed in the information provided as part of the submission made as part of the Call for Sites exercise is not subject to any technical or environmental constraints.</p> <p>Previous of the Regulation 19 Draft Crawley Local Plan were subject to public consultation between January and February 2020 (“Draft Local Plan 2020”) and January and June 2021 (hereafter the “Draft Local Plan 2021”). Quod submitted representations on behalf of the Landowners as part of these consultations.</p> <p>These representations are structured to initially provide an executive summary and overall vision for the redevelopment of the Site, before setting out the Landowners’ specific comments and objections to the Draft Local Plan 2023.</p> <p>Suggested Modifications:</p>
REP/053 (2023)	Quod on behalf of Barker Trust	EC1	<p>2 Executive Summary and Vision</p> <p>The Draft Local Plan 2023 seeks to protect and enhance Crawley’s role as key economic driver, recognising that there is a significant requirement for additional land to accommodate industrial employment needs. However, the full objectively assessed need is not provided for in the emerging plan. Therefore, in the context of the published evidence base, the National Planning Policy Framework (2021) (“NPPF”) and up to date circumstances, the Local Plan will be unsound if it seeks to plan for anything less than full employment needs – Draft Policy EC1 should be updated accordingly.</p> <p>3 Representations to the Draft Local Plan 2023 Sustainable Economic Growth</p> <p>The NPPF requires planning policies to help create the conditions in which businesses can invest, expand and adapt with significant weight to be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (Paragraph 81).</p>

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			<p>Paragraph 82 explains that planning policies should: “a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration; b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and</p> <p>In practice this means the Local Plan must take the opportunity to plan for growth, taking advantage of its excellent labour market, transport and locational advantages, and ensure land availability is no longer holding back sustainable growth.</p> <p>Instead, through the updated Draft Policy EC1, the Plan seeks to reduce employment land provision from the 38.7ha previously proposed in 2021 to 26.2ha. It aims to provide only a minimum amount of employment land, despite indications this may not be sufficient, and acknowledging a recent history of land supply falling significantly short of demand, particularly for industrial land.</p> <p>The reduced land allocation is the result of updated Experian employment forecasts, set out in the 2023 Economic Growth Assessment (“2023 EGA”). These forecasts assume significantly lower growth than in the forecasts undertaken three years earlier. They represent a snapshot at a lower point in growth after a period of economic turmoil through Brexit and Covid-19. The wide variation of employment projections within just the last few years demonstrates the risk of planning only for the minimum demand.</p> <p>As well as the Experian forecasts, the 2023 EGA also looks at past demand and notes that take-up rates of employment floorspace “provide some basis to plan for slightly higher industrial land requirements”, which the Draft Local Plan 2023 does not do. In fact the EGA shows that, if past take up were used as the basis for the Draft Local Plan 2023, instead of the Experian Forecasts, industrial land requirements would be 26% higher. This further highlights the risk of providing only a minimum provision.</p> <p>Topic Paper 5 “Employment Needs and Land Supply” published with the Draft Local Plan 2023 states that the Experian-based figures, “must be viewed as representing a minimum business land requirement, falling some way short of the ‘past trends’ scenario, which is itself a product of historically constrained land supply” (p.29). The Topic Paper explains that “only very limited new employment land has come forward, past development rates are likely to have been suppressed. This aligns with the consistently held market view that limited availability of suitable industrial land and premises has resulted in ‘pent-up’ demand that frequently is unable to be satisfied within the market, increasing rents and in some cases necessitating occupiers to locate elsewhere” (p.26).</p> <p>Therefore, the evidence base suggests very strong demand for employment land that has not been met in the past, and would not be met in the future by the proposed allocations in Draft Policy EC1. The proposal to provide</p>

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			<p>only a minimum amount of land – less than has normally been needed in the past – does not meet the requirement of the NPPF to plan positively and proactively for sustainable economic growth.</p> <p>The Draft Local Plan 2023 fails to meet the requirements of the NPPF. It fails to adequately account for the economic opportunities and risks facing the borough, fails to plan for its full economic potential and therefore fails to positively and proactively plan for sustainable economic growth.</p> <p>The history of the Council's forecasts and the borough's economic context have been detailed in the Landowners representations in 2020 and 2021. The Economic Case for Development 2021 Update submitted with those representations tracks the historic under delivery and constraint in the borough, and the economic impact and risk associated with that. The conclusions of that report still stand: "CBC has committed to sustainable economic growth and prosperity for its residents and its businesses. [...] "In constraining its employment land commitments to this extent the borough is creating uncertainty in the local market for employment which is likely to affect both the prices of existing stock and the investor confidence in planning for new sites. "Crawley has a strong economic foundation and its own evidence base as well as market intelligence demonstrates it has substantial potential for continued expansion into key growth sectors such retailing logistics, as well as to capture continued growth associated with Gatwick. However, its stock is ageing and size ranges (including very large and very small sites) are currently limited compared to demand. Large sites (or more than 100,000 sqft) in particular are not currently available to meet potential needs. "Crawley should, in order to meet its own aspirations as well as the requirements of National planning policy, be proactively and positively planning for growth."</p> <p>Crawley fails to plan for employment land that would support even its much more modest housing growth forecast. Taking this growth forecast into account (on which the Borough heavily relies to meet housing need), employment land needs would be 69ha as a minimum rather than 26.2ha identified by the Council so as to maintain commuting patterns. Therefore, the full objectively assessed need, having regard to the Duty to Cooperate, is not provided for in the emerging plan and is not consistent with the requirements of the NPPF.</p> <p>The Draft Local Plan 2023 does not meet the requirements of the NPPF as it is not effective or justified. If the Council do not prepare the plan in a more positive manner this will result in an unsound plan. As such, Draft Policy EC1 should be updated to reflect the employment land needs of a minimum of 69ha.</p> <p>The Council have identified that the 22.9ha of industrial land required (of the 26.2ha), predominantly Class B8 storage & distribution warehousing, can be met through existing supply and the Strategic Employment Location (i.e., within Crawley's boundaries). The Draft Local Plan 2023 identifies an existing industrial land supply pipeline of 9.17ha.</p>

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			<p>Within Draft Policy EC4 the Council have allocated the land at Gatwick Green as a Strategic Employment Location to provide a minimum of 13.73ha new industrial land (the residual amount), predominantly for Class B8 storage and distribution use.</p> <p>We do not consider the proposed Gatwick Green allocation to be suitable. The key issue relates to transport as detailed within the Transport Appraisal of Gatwick Green attached at Document 2.</p> <p>Gatwick Green is not easily accessible by foot from residential development and there is no existing infrastructure for cyclists serving the site and suitable provision cannot be easily accommodated. Furthermore, there are currently no bus services located within reasonable walking distance of Gatwick Green and no evidence has been provided that a range of bus routes serving a variety of destinations will be delivered to support development at Gatwick Green.</p> <p>There is very little spare capacity in the permitted junction system to accommodate traffic from new development. In the absence of further physical infrastructure interventions to provide the necessary capacity, traffic arising from Gatwick Green would block back onto the carriageway at the existing junctions resulting in unacceptable highway safety impacts and severe residual impacts on the road network. Sufficient evidence has not been provided to demonstrate that necessary new junction improvements are effective, deliverable or safe and suitable.</p> <p>The Transport Appraisal concludes that development at Gatwick Green:</p> <ul style="list-style-type: none"> ▪ is unsustainable in transportation terms thereby failing to meet the requirements of paragraphs 105 and 110 (a) of the NPPF; ▪ does not demonstrate that safe and suitable access (including access routes) can be achieved for all users thereby failing to meet the requirements of paragraph 110 (b) of the NPPF; ▪ relies on significant new infrastructure interventions that have neither been quantified nor demonstrated to be cost effectively deliverable thereby failing to meet the requirements of paragraph 110 (c) of the NPPF; ▪ would result in an unacceptable impact on highway safety thereby meeting the test at paragraph 111 of the NPPF against which development should be prevented or refused; and ▪ would result in severe residual cumulative impacts on the road network thereby meeting the test at paragraph 111 of the NPPF against which development should be prevented or refused. <p>Draft Policy EC4 requires a Transport Assessment and Mobility Strategy to be submitted with a future planning application for the development of Gatwick Green. However, the NPPF is clear that potential site allocations should be appropriately assessed and based on the assessment of existing infrastructure and required infrastructure. This has not been provided and as such the proposed site allocation is not in accordance with national policy and cannot be considered to be suitable. Furthermore, it is likely that any junction works will take a significant amount of time to deliver, potentially between 7-10 years.</p>

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			<p>Draft Policy EC1 should be updated to remove reference to Gatwick Green and Draft Policy EC4 should be deleted.</p> <p>Even if the proposed site allocation was demonstrated to be suitable, there still remains an outstanding industrial land need of to ensure the plan is sound. The scale of demand for employment land in this area means that such large-scale new allocations are likely to be needed in the future. However, as development of the scale of Gatwick Green, on an entirely new site, takes considerable time – with land assembly and civil engineering works to provide access. This does not provide an immediate solution to the long-standing shortfall of employment land that is holding back sustainable economic growth.</p> <p>There is a significant need for employment land in Crawley and as currently drafted the Draft Local Plan 2023 is unsound.</p> <p>Suggested Modifications: Draft Policy EC1 should be updated to remove reference to Gatwick Green</p>
REP/055 (2023)	Gatwick Green Limited	EC1	<p>1.0 Introduction</p> <p>1.1 This Statement of Case is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of the The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to Strategic Policy EC1 of the Draft Crawley Borough Local Plan, 2023 (DCBLP / the Plan).</p> <p>1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The plan at Appendix 1 shows the extent of GGL's land and the proposed allocation of Gatwick Green. The land has been promoted by TWG/GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) (the Site) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation is divided into four further sections: Section 2.0 – provides a summary of the representation, setting out the element of Strategic Policy EC1 to which GGL is objecting, the basis of that objection in terms of soundness and what changes are being sought to policy to address the objection. Section 3.0 – provides the detailed evidence in support of a more robust approach to economic needs and a higher requirement for employment land. Section 4.0 – provides evidence that supports the spatial element of Strategic Policy EC1 and the role of Crawley in the Council's economic strategy.</p>

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			<p>Section 5.0 – sets out the basis for GGL’s objection based on the evidence, why Strategic Policy EC1 is considered not to be sound, and what changes are required to make the policy sound.</p> <p>2.0 Summary of representation</p> <p>Employment land needs</p> <p>2.1 Strategic Policy EC1 sets out the strategy for sustainable economic growth and has three elements – it identifies (1) the economic role of Crawley within the sub-region, (2) the future <u>minimum</u> need for employment land to 2040, and (3) the spatial strategy, which focuses on the Main Employment Areas (MEAs) and an industrial-led Strategic Employment Area (SEL) at Gatwick Green to deliver economic growth. Whilst Strategic Policy EC1 is consistent with the role of strategic policies in the National Planning Policy Framework (NPPF - paras 20-23 and 11b), the second element of the policy is not sound, (NPPF, para 35), as it is not positively prepared and fails to identify the demonstrable and higher level of need for additional employment land for industrial and logistics (I&L) purposes.</p> <p>2.2 The Council relies on two parts of its evidence base to justify the minimum level of need in Strategic Policy EC1. These are, (1) a quantitative economic assessment by Lichfields contained in the Council’s Economic Growth Assessment Supplementary Update for Crawley (EGA SU)¹, and (2) a qualitative overview of market signals and indicators contained in Topic Paper 5 (TP5)². The EGA SU contains econometric / demographic-based forecasts of employment land based on labour demand, labour supply and past take-up methods. Lichfields recommend that the labour demand forecast is adopted as a minimum for planning purposes, namely 26.2 ha of I&L and office land, of which 22.9 ha is for I&L. However, the EGA SU forecasts provide only one part of the evidence base that is required by Planning Practice Guidance (PPG). The missing part is an assessment of future property market requirements³, with particular reference to the need for land for logistics⁴.</p> <p>2.3 The qualitative evidence in TP5 indicates that the national and regional market for I&L uses is significant and will continue to grow, but the Council has not undertaken the property-based analysis to identify what that quantum should be. Consequently, the full extent of future employment land needs for I&L uses has not been established. This shortcoming in the Council’s evidence means that <u>Strategic Policy EC1 has not been positively prepared as it fails to identify and demonstrate the full objectively assessed need as NPPF requires (para 11b)</u>. In defining a minimum need, the policy is not sound in terms of the requirements of the <u>NPPF (para 35)</u>.</p>

¹ Northern West Sussex Economic Growth Assessment Supplementary Update for Crawley, Final Report, Lichfields, January 2023

² Topic Paper 5, Employment Needs and Land Supply, Crawley Borough Council, May 2023

³ Paragraph: 027 Reference ID: 2a-027-20190220

⁴ Paragraph: 031 Reference ID: 2a-031-20190722

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			<p>2.4 The missing element in the evidence base has been undertaken by Savills⁵ (Appendix 2 - Savills Market Demand Forecast report) using its industry-standard suppressed demand model to quantify the future land need for I&L uses, adopting the same Functional Economic Market Area (FEMA) as that adopted by Lichfields. This results in a market-informed assessment of <u>future market needs of 69 ha for I&L uses to 2040</u>. This is considered to represent a robust assessment and supports the qualitative market signals and indicators contained in TP5 and Savills Market Demand Forecast report.</p> <p>2.5 In short, Strategic Policy EC1 contains the right spatial strategy and land use response to the available evidence, but is not considered to be positively prepared with regard to how the level of future need has been determined and expressed. To be positively prepared, the policy should identify a future need figure that is market-informed and justified by a property-based market assessment. Savills has provided this assessment, so the evidence base is complete and can form the basis of an amendment to Strategic Policy EC1 so as to ensure it can be assessed as being positively prepared. <u>The amendment being sought by GGL is to substitute the need figure of a minimum of 26.2 ha with 69 ha.</u></p> <p>2.6 An amendment to the identified need figure will have implications for Strategic Policy EC4. These are addressed in a separate representation by GGL. In summary, Strategic Policy EC4 no longer needs to identify the future need or the related provision for additional floorspace based on 'appropriate evidence': the policy can simply identify Gatwick Green and state its gross site areas as 44 ha towards meeting the future need established in Strategic Policy EC1.</p> <p>2.7 The representation also cites evidence contained in GGL's representation on Policy GAT2 (Safeguarded Land), which supports the policy by confirming that there is no evidence to show that the Gatwick Green site is required for car parking as part of a possible future southern wide-spaced runway at Gatwick Airport. This is important in that it demonstrates that the Council has correctly weighed up the pressing and immediate economic needs of its area and has come to a clear conclusion that the evidence for a SEL at Gatwick Green is overwhelming, whereas in contrast there is no robust evidence for continuing to safeguard the Site for airport landside surface car parking.</p> <p>The role of Crawley and the spatial strategy</p> <p>2.8 This representation puts forward evidence that supports the role of Crawley in the sub-region and the spatial element of Strategic Policy EC1. This evidence demonstrates that the location of a SEL at Gatwick Green is justified by a range of evidence on the locational drivers for strategic I&L development. In summary, <u>Crawley is correctly identified as the economic driver of the Coast to Capital and Gatwick</u></p>

⁵ Gatwick Green, Crawley – Strategic Industrial & Logistics – Market Demand Forecast for Crawley, Savills, June 2023

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			<p><u>Diamond areas and that locationally, Gatwick Green is the optimum location within the FEMA and the M23/A23 corridor.</u></p> <p>3.0 Economic needs and employment land – the evidence for higher requirements</p> <p>3.1 This part of the representation provides evidence on the higher scale of economic and business needs that forms a robust basis for Strategic Policy EC1. It deals firstly with the different approaches to forecasting for future employment land needs and the importance of an assessment of future market demand for I&L land. Secondly, it sets out the basis of the market assessment by Savills and why this provides the most robust assessment of future needs as required by PPG.</p> <p>3.2 Strategic Policy EC1 identifies that there is an overall need for a minimum of 113,390 sqm (26.2 ha) of new business land in the borough. Once the supply of land identified in the Council's Employment Land Trajectory (ELT) has been taken into account, the policy identifies a need for a minimum of 41,315 sqm (13.73 ha) of land for B8 industrial, principally storage and distribution land to 2040. The Council's EGA SU includes forecasts based on labour demand, labour supply and past take-up rates, which produce a range of overall employment land requirements between <u>26.2 ha</u> (labour demand) and <u>26.1 ha</u> (labour supply - based on 314 dpa).</p> <p>3.3 The Savills Market Forecast report (Appendix 2) notes that these assessments reflected more contemporary macroeconomic factors when compared to the forecasts considered in previous versions of the EGA. The updated scenarios generate gross employment floorspace requirements that range from 113,351 sqm (or 26.2 ha) to 299,362 sqm or (69.0 ha) over the 2023-2040 period (para 3.2.6). Lichfields recommended that the Experian baseline job growth projections was the most appropriate basis for planning for future employment land requirements from a labour demand perspective, and significantly within the industrial sector from which the overall gross land need was identified as 22.9 ha.</p> <p>3.4 The Savills Market Forecast report then outlines some important observations on the Lichfields forecasts (paras 3.3.2 – 3.3.12). In summary, Savills has identified the following limitations in the forecasts used by Lichfields:</p> <p>Economic restructuring – The labour demand method used by the EGA (2023) often reflect the continued restructuring of the economy away from industry towards services, which underestimate the I&L sector's performance. Conversely, growth in floorspace/land is not accurately predicted in changes in jobs.</p> <p>Changing business models – I&L companies are increasingly co-locating office, research and development, and administrative functions with I&L operations. Such co-located employment is not well captured by labour demand models, as these assume I&L activities are wholly accommodated within a narrow set of Standard Industrial Classification ('SIC') codes.</p> <p>Historic job growth has outstripped the econometric projections – The underestimation of future demand from the labour demand model is apparent when historic jobs growth in the logistics sector are compared with</p>

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			<p>future job projections from major statistics houses. Logistics jobs nationally have grown 23% over ten years. However, labour forecasting products⁶ predict much lower levels of growth, including negative growth, over the next 20 years.</p> <p>Current and future growth drivers are not accounted for – The EGA’s primary reliance on historic trends inevitably results in its future demand estimates underestimating future need, as it has not taken into account of modern day growth drivers, e.g. increasing online retailing, growing freight volumes, increased desire for next day/same day deliveries etc. These factors are explained in more detail at paragraphs 3.3.7-3.3.12 of the Savills market demand report.</p> <p>3.5 A high-level review of the above evidence base documents is contained at Appendix 3 – this shows very clearly that the EGA SU and TP5 do not provide all the evidence that is required by PPG in order to comprehensively define the future need for employment land. The table shows that EGA SU has fully or partly covered some of the PPG requirements, with the gaps being plugged by the Savills demand report.</p> <p>3.6 To address these shortcomings, Savills uses a suppressed demand model, which is explained at paragraphs 3.3.13-3.3.16 of the Market Forecast report. When supply, as signalled by floorspace availability, is low, demand is ‘suppressed’ as prospective tenants cannot find space in a market. A figure of 8% is typically referred to as the equilibrium level, nationally, when supply and demand are broadly in balance. Below this level, available supply becomes tight and rents increase, as occupiers compete for limited available stock. These indicators are a clear sign of market failure, characterised by the constrained or suppressed supply of land for I&L uses in the FEMA and significantly in Crawley.</p> <p>3.7 Crawley has experienced availability below this equilibrium level between 2012 and 2021 as has the Lichfields FEMA between 2013 and 2022. This clearly indicates that Crawley, the Lichfields FEMA and Savills wider FEMA have been supply constrained for a large part of the last decade, with insufficient supply for the market to accommodate efficiently. Rental growth outpacing inflation by a significant margin is another indicator of limited supply and Figure 4.7 in Section 4 of the Savills Market Forecast report shows the impact for Crawley. Strong rental growth is a by-product of strong occupier demand as they compete for limited available stock and rents increase. <u>The EGA has taken no account of demand that has been lost due to supply constraints and therefore it presents a demand profile based on a supply-constrained historic trend</u> (or ‘suppressed demand’).</p> <p>3.8 Savills has developed a methodology for estimating future I&L demand that addresses the issues raised above. Savills methodology is NPPG-compliant, as it builds upon historic take-up (demand), adjusting past trends for historic supply shortages and the subsequent loss in demand where needed.</p>

⁶ Experian, East of England Forecasting Model (‘EEFM’) and Oxford Economics

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			<p>3.9 Overall, the EGA SU has identified a range of forecasts. TP5 acknowledges that past trends indicate an overall need for 28.9 ha; as such, the selected labour demand forecast of 26.2 ha must be treated as a “minimum” (para 4.77). However, the EGA SU is missing evidence required by PPG – namely a market assessment of general future employment land requirements and, more specifically, for those related to logistics. Whilst PPG requires an assessment of future property market requirements, it is a requirement that this includes logistics given its crucial role in enabling efficient, sustainable and effective supply of goods for consumers, and its specific locational requirements⁷.</p> <p>3.10 The EGA SU therefore only presents part of the picture. Additional evidence is presented in Section 5 of TP5 on wider market indicators and signals, including the demand and supply position in Crawley based on reliable industry market research and the Council’s knowledge of supply from its own records. From the EGA SU and the limited market assessment in TP5, the conclusion is that “...<i>there is a clear and consistent message across multiple Economic Growth Assessments, reiterated by market analysis, that Crawley has not been able to meet its employment needs in full, and there remains significant demand for new industrial and storage & distribution land</i>”. However, <u>TP5 does not provide any market-informed assessment of future property market requirements as sought in PPG.</u></p> <p>3.11 Savills Market Forecast report sets out a full and robust assessment of the future property market requirements based on its suppressed demand model. This takes account of past demand that wasn’t fulfilled due to a severe historic / current constraint on land supply (past net absorption), due largely to the ongoing safeguarding of land at Crawley for a possible future wider-spaced southern runway. That demand has been historically, and is currently, constrained as acknowledged in the EGA SU and TP5. Savills Market Forecast report sets out an assessment of the future market demand for I&L land to 2040 in Crawley based on the Lichfields FEMA (details in Section 5). The assessment provides two future market demand figures, one based on the Lichfields FEMA, and the other based on a larger Savills FEMA that includes areas north of Crawley in recognition the market connections to that area. The results are shown in Figures 5.4 and 5.5 of the market demand report and summarised below:</p> <table border="0"> <tr> <td>EGA SU</td> <td>22.9 ha</td> </tr> <tr> <td>Savills larger FEMA</td> <td>118 ha</td> </tr> <tr> <td>Lichfields FEMA</td> <td>69 ha</td> </tr> </table> <p>3.12 Savills estimate of I&L demand in Crawley over the 18 year plan period is between 69 ha to 118 ha, significantly higher than the EGA (2023) estimate of 22.9 ha for industrial uses. In order to maintain geographic consistency with the Lichfields FEMA, <u>the future need of 69 ha is considered to represent the</u></p>	EGA SU	22.9 ha	Savills larger FEMA	118 ha	Lichfields FEMA	69 ha
EGA SU	22.9 ha								
Savills larger FEMA	118 ha								
Lichfields FEMA	69 ha								

⁷ Paragraph: 030 Reference ID: 2a-030-20190220 and Paragraph: 031 Reference ID: 2a-031-20190722

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			<p><u>most appropriate assessment</u>, but the larger Savills FEMA also illustrates the possible scale of need if the larger FEMA were adopted.</p> <p>3.13 The evidence base documents produced by Crawley BC and Savills represent the full range of assessment approaches identified in PPG. However, it is the Savills assessment of future market demand that provides a robust and industry-approved understanding of the future market need for land for I&L land. Savills forecast, therefore, presents the most robust basis for future planning, based as it is on future market requirements. The EGA SU, TP5 and the Savills market demand report collectively comprise the suite of evidence that meets in full the requirements of PPG. Whilst the EGA SU indicates some higher levels of future need, it is the <u>Savills market-informed assessment that represents the most robust view of future needs, which is also PPG-compliant and accords with the need for local plans to be 'positively prepared' so as to be sound</u> (para 35a).</p> <p>3.14 Of interest is that the Savills future demand figure is very similar to Savills forecast in its market report⁸ dated February 2020 of a minimum of 70.2 ha, albeit based on a somewhat different model. This report forms part of the Council's evidence base to the DCBLP (Consultation statement appendix 5b: Wilky Group appendices combined). The strength of the future UK market for I&L uses is corroborated in a number of industry research papers by Lambert Smith Hampton, CBRE and Colliers, as noted in Savills market demand report (Section 6.7).</p> <p>3.15 The Savills Market Forecast report outlines further evidence that supports the need to provide for a significant amount of land for I&L uses, namely the lack of land supply in Crawley which is constraining growth, with related consequences (Section 4). This evidence, and the assessment of future market demand for I&L land, informs an assessment of the reasons why growth should be facilitated at Crawley (Section 6).</p> <p style="text-align: center;">Lack of supply</p> <p>3.16 As noted in this representation, the availability and rent indicators for the FEMA and Crawley point to a historically very tight market. Further, the lack of larger unit supply in the FEMA and Crawley, coupled with the strong occupier demand for these size bands, has led to there being critically low availability. The FEMA and Crawley have a lack of supply of larger units relative to the England average. There is effectively no availability in the 250,000 to 500,000 sq.ft and 500,000 plus sq.ft size bands. Gatwick Green offers a large strategic site in a prime location that can facilitate the delivery of new high specification units above 250,000 sq.ft, and the 75,000 sq.ft+ gap in the market identified in the Council's previous Topic Paper 5 (January 2021).</p>

⁸ Appendix 3 to TWG's representations on the DCBLP (Jan 2020) – Employment Land Needs in Crawley, Savills, February 2020

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			<p style="text-align: center;">Why should I&L growth be facilitated</p> <p>3.17 Chapter 6 of the Savills Market Forecast report sets out the important reasons why facilitating strategic I&L development at Crawley is critical to the economy. The sector has been outperforming other commercial sectors in the UK for some time, but it is also '<u>critical national infrastructure</u>' supporting the functioning of our economy and the way we live our lives. Current demand within the I&L sector is at unprecedented levels being supported by a number of key growth drivers. Given the current macro-economic challenges, it is vital to support those sectors which are proving to be resilient (such as I&L) and are therefore well-placed to provide new employment opportunities and mitigate job losses in other sectors.</p> <p>3.18 Given the current economic challenges, it is vital to support those sectors which are proving to be resilient (such as I&L) and are, therefore, well-placed to provide new employment opportunities to mitigate job losses in other sectors and underpin economic recovery. The growth in I&L is structural rather than temporary, with e-commerce growth expected to be 65% by 2050, or before. Consumer expectations for same-day or next-day delivery have reshaped the operating models of logistics companies. It is extremely unlikely that we are going to see a U-turn on such expectations. As the UK economy grows in terms of population and number of businesses, so will the need for I&L – these fundamental growth drivers (population plus business growth) are strong in Crawley with expected growth in Crawley's resident population set to increase by 4% (+ 4,800 people) over 2023 – 2043 (sub-sections 6.2, 6.3, 6.4).</p> <p>3.19 Other critical factors in favour of developing I&L uses include (sub-sections 6.5 and 6.6):</p> <ul style="list-style-type: none"> • Wider supply chain employment is overlooked – I&L development delivers far more jobs in areas it is located than just the on-site jobs arising from the lower job densities associated with logistics development. • Indirect GVA – This captures the impact that the logistics sector has on other segments of the economy. These inputs and outputs generate economic value that logistics has played a vital role in helping to realise. • Earnings - In the South East, jobs in logistics pay +£4,800 more than average per annum, and jobs in manufacturing pay +£5,300 more. • Quality and diversity of jobs – Jobs in the I&L sector are becoming increasingly diverse: the share of higher-skill roles has increased by 39%, with the biggest increase being in Professional Occupations, where the number of roles has increased by 97%. There has been an increase in office-based roles in the I&L sector, with occupations going up by 15% over the last decade. Office-based roles are increasingly co-locating alongside production and logistics uses as it is convenient for these people to be closer to the operations they control and analyse. <p>3.20 In summary, there has been a historical paucity of supply of land for I&L uses in Crawley and the wider FEMA, which has led to levels of availability below the market equilibrium and higher than average levels of rent - all characteristic of a long-standing tight market. Evidence also suggest a lack of supply of large and very large I&L units (75,000 sq.ft – 250,000 sq.ft+) across the FEMA, and particularly in Crawley. This</p>

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			<p>suppressed demand has been used as the basis for developing a market demand forecast for I&L business land in line with the advice in PPG. The resultant forecast for I&L land is <u>69 ha over the 18-year period to 2040.</u></p> <p>3.21 There are a number of other critically important reasons why I&L growth should be facilitated in Crawley, but perhaps the strongest is the delivery of a diverse range of quality jobs. This is of major importance given Crawley's overreliance on jobs arising from Gatwick Airport, which tend to be lower skilled, of limited variability and with limited prospects for career progression / increased earnings. This was highlighted in the pandemic, when Crawley was disproportionately affected by the significant contraction in Gatwick Airport. I&L growth will therefore deliver significant benefits to Crawley and the wider FEMA, these being more significant because of the locational benefits offered by Gatwick Green's close proximity to a major international airport, the M23 motorway and the London to Brighton mainline rail.</p> <p>3.22 GGL's representation on Strategic Policy GAT2 contains a statement highlighting the key reasons why the Council was correct in removing the Gatwick Green site from airport safeguarding and instead allocating it for a Strategic Employment Location so as to fulfil the Council's Vision and economic strategy, and deliver benefits across the region.</p> <p>4.0 The role of Crawley and the spatial strategy</p> <p>4.1 Savills Economics has prepared a Strategic Industrial and Logistics report⁹ on the locational drivers of logistics uses. The report is attached at Appendix 4. This evidence is presented as it reinforces the strong locational credentials of the Gatwick Green SEL.</p> <p>4.2 The key findings of the report are reproduced here and succinctly demonstrate why Gatwick Green is a prime location for strategic I&L development that can leverage a range of key benefits to the local economy. The key findings of the report are:</p> <ul style="list-style-type: none"> • National, regional and local policy guidance and strategies all variously identify the key factors that drive the location of strategic I&L uses, such as <u>accessibility to the M23, customers and suppliers, a large labour pool, freight handling infrastructure (including Gatwick Airport) and proximity to London.</u> • When policy and guidance is applied to the regional/local context, it points directly to the <u>Crawley/Gatwick area as the prime location</u> for such uses to leverage various economic benefits. • <u>UK airports are a major locational driver for strategic I&L development</u> – by comparison with several benchmark airports, it is clear that the hinterland of Gatwick Airport is significantly under-prevising for I&L uses, and especially very large units (above 250,000 sq.ft).

⁹ Strategic Industrial and Logistics – Location and Complementarity, Savills, June 2023

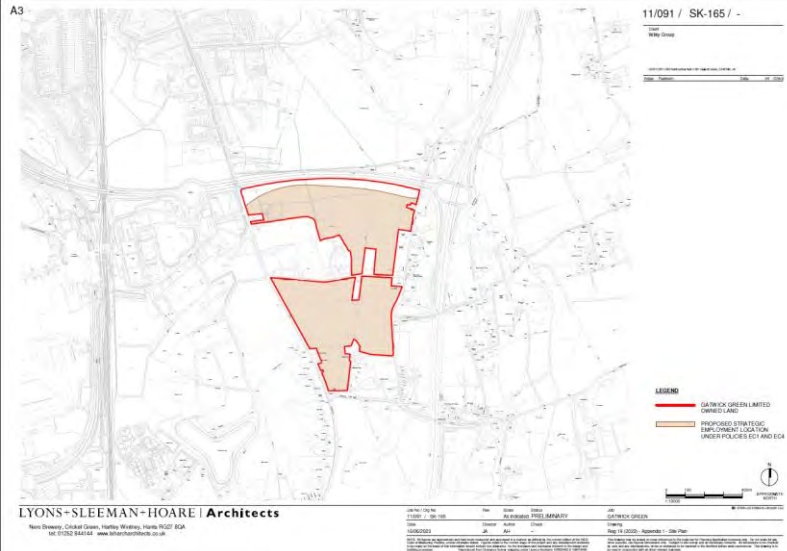
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			<ul style="list-style-type: none"> A range of property-based evidence clearly shows that <u>Gatwick Green would complement Manor Royal, other MEAs in Crawley and beyond and the Horley Business Park</u>, offering different and mutually supportive opportunities for large and very large I&L units that cannot be accommodated at Manor Royal without harming its mixed business profile. The <u>agglomeration benefits</u> of Gatwick Green further strengthen the complementarity between the Site and the other MEAs. <p>4.3 These factors underline the significant attributes of the location of the SEL east of Gatwick Airport. The location of Gatwick Green is therefore fully aligned with the key location drivers identified in national planning policy, regional strategies and occupier requirements. This confirms beyond any doubt that the spatial element of Strategic Policy EC1 is robust and represents the best options in economic, social and environmental terms compared with the other options looked at for addressing Crawley growth needs in the SA/SEA¹⁰.</p> <p>4.4 The economic benefits and social value that would be derived from Gatwick Green have been calculated based on the Site's nominal capacity of 77,800 sqm¹¹ (837,439 sq.ft) taken from the Council's transport assessment for the DCBLP. The infographic at Appendix 5 contains all the headline figures, the key ones being:</p> <ul style="list-style-type: none"> 1,290 jobs for the residents of Crawley. £79m of GVA per annum to the local economy. £30m GVA during the construction phase. 630 jobs during the construction phase. Business rates revenue of £4.3 million per annum. A broad range of occupations with c 30% being managers, directors or professional occupations. Significant support for apprenticeships, new entrants, qualifying the local workforce and construction careers events. <p>4.5 These economic and social value deliverables underline the wider benefits that Gatwick Green would deliver. This will ensure that the vision for Crawley in the DCBLP and the economic strategy and recovery plan for the town can be delivered in full, including the wider catalytic benefits identified in this representation.</p> <p>Appendix 1: Site Plan</p>

¹⁰ Sustainability Appraisal / Strategic Environmental Assessment, draft report for the submission Local Plan, Crawley Borough Council, May 2023

¹¹ 77,800 sqm is a nominal capacity that has been tested in Crawley's transport model, with sensitivity testing of higher levels of development.

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Appendix 2: Strategic Industrial & Logistics – Market-demand forecast for Crawley

1 Introduction

1.1 Purpose

This report has been prepared on behalf of the Gatwick Green Limited (GGL) and provides an evidence based overview of the need for new industrial and logistics (I&L) development (the Proposed Development) at Gatwick Green. The report has been prepared in accordance with the latest advice contained in the Planning Practice Guidance (PPG, 2019 updates) relating specifically to market and property considerations.

As part of our work, we review Crawley Borough Council’s employment evidence. The selected labour demand method used in the Economic Growth Assessment (EGA) Supplementary Update for Crawley (2023) fails to account for current day market drivers which has led to an underestimation of ‘true’ market demand for I&L uses in Crawley.

We have considered supply and demand factors in the I&L markets of Crawley, the Lichfields Functional Economic Market Area (FEMA) (Crawley, Horsham and Mid Sussex), and the Savills FEMA (Crawley, Horsham, Mid Sussex, Mole Valley, Reigate & Banstead and Tandridge), to gauge the relevant market strength for I&L units of different sizes at the Subject Site.

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			<p>After building up our own picture of market demand and supply within the Lichfields FEMA and the Savills FEMA, we detail Savills' methodology for estimating future demand. Our approach is considered to build on the Council's employment evidence by quantifying the impact historic supply constraints have had on 'suppressing' demand. As we explain within, we consider our approach to estimating future I&L demand to be NPPF/NPPG compliant and industry best practice having being endorsed by the British Property Federation (BPF) in our recent publication <i>'Levelling-Up – The Logic of Logistics'</i>. This report is also mentioned in the DfT's recently published <i>'Future of Freight Plan'</i>, and was shortlisted for an RTPi Award for Research Excellence 2022.</p> <p>We then consider some of the key sectorial trends and reinforce the economic characteristics of the I&L sector and counter common misconceptions. We draw upon analysis from Savills' recent publication of the BPF <i>'Levelling-up – The Logic of Logistics'</i>, Savills' <i>Big Shed Briefings</i>, and other relevant research.</p> <p>1.2 Report Structure The report is structured as follows:</p> <ul style="list-style-type: none"> • Section 2 provides a summary of the scope of economic and property market assessment work required under Planning Practice Guidance (PPG); • Section 3 reviews Crawley Borough Council's employment evidence, specifically its approach to estimating future I&L demand; • Section 4 presents the market demand and supply analysis which confirms that Crawley has historically been supply constrained, especially for larger units, resulting in a historical constraint on growth which needs to be addressed in the Local Plan; • Section 5 presents Savills' future I&L demand estimates for the Lichfields FEMA, the Savills FEMA, and Crawley specifically, as required in PPG (Paragraph: 027 Reference ID 2a-027-20190220 and Paragraph: 031 Reference ID: 2a-031-20190722), and compares this against the Council's employment evidence; • Section 6 summarises some of the key trends and economic characteristics of the I&L sector, and why its growth should be facilitated in Crawley at Gatwick Green; and • Section 7 outlines the report's key conclusions. <p>1.3 Report's Key Findings The report's key findings include:</p> <ul style="list-style-type: none"> • Our review of the Council's employment evidence highlights a number of observations. The selected labour demand method fails to account for current day market drivers which we consider has led to an underestimation of 'true' market demand for I&L land in Crawley; • Crawley, the Lichfields FEMA, and the Savills FEMA all have been supply constrained historically, with availability having been below the 8% equilibrium rate for much of the last decade. Another confirming factor of demand outstripping supply is the high rental growth, which has been three times the rate of inflation across all geographies;

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			<ul style="list-style-type: none"> • This demand/supply imbalance is particularly stark with regards to larger units above 250,000 sq.ft in the Lichfields FEMA and Savills FEMA, where availability is effectively zero; • Based on Savills' demand methodology, over an 18 year period which is consistent with the Council's employment evidence, the first run of the model using the Lichfields FEMA estimates I&L demand within Crawley to be 69 ha of land. The second run of the model using the Savills FEMA estimates I&L demand within Crawley to be 118 ha of land. • Savills' estimate is significantly higher than the EGA (2023) estimate of 22.9 ha for industrial uses over the period 2023 to 2040, referenced in the Draft Crawley Borough Local Plan (2023); and • There are a number of reasons why I&L growth should be facilitated. I&L is critical to Crawley's economy, accounting for 32% of total employment in the area, which is over two times higher than the sector's share across England and Wales (13%). Current demand within the logistics sector is at unprecedented levels and is proving to be resilient, and is therefore well-placed to provide new employment opportunities to mitigate job losses in other sectors. On-site job density is only a small part of I&L's economic contribution, and the I&L sector supports well-paid and diverse jobs. <p>1.4 Reader Note When we refer to the I&L sector we mean Light Industrial (formerly B1c use class now part of Class E), General Industry (B2 use class) and Storage and Distribution (B8 use class). Effectively the primary use classes that require warehouses and factories (including ancillary offices) and associated yard spaces. These use classes typically cover the diverse range of industrial, manufacturing and logistics companies that operate within England.</p> <p>2 National Planning Policy and Guidance 2.1 Introduction Within this section we consider the key requirements of the Planning Practice Guidance (PPG, updated 2019) in relation to assessing a range of data on the supply of, and demand for, labour, the business economy, and the property market, to arrive at a robust assessment of the future needs for employment land in quantitative and qualitative terms.</p> <p>The review of this guidance forms the basis of an assessment in Chapter 3 of the scope and outputs of the Crawley Borough Council's 2023 update to the Economic Growth Assessment (EGA), and the additional work by Savills to provide the market-informed elements of the overall assessment of future needs.</p> <p>2.2 Evidence Base¹ The PPG requires that future needs are assessed on the basis of a Functional Economic Market Area (FEMA). For Crawley, this has been defined as the North West Sussex area, comprising the local authorities of Crawley</p>

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			<p>Borough, Horsham District, and Mid Sussex District. This was defined by Lichfields as the basis for its assessment, and is also the basis of Savills' future demand estimates (Section 5).</p> <p>The PPG requires an assessment of the existing stock of land and floorspace, and the patterns of recent land supply and loss. A review of the evidence of market demand is then required, utilising a variety of market intelligence from known data sources and engagement with the business sector. It is noted that wider market signals around trends in growth, diversification, and innovation can inform the assessment.</p> <p>Evidence of market failure within the FEMA may also be of relevance, which could include current/past constraints on the supply of employment land which has interrupted the normal operations of market forces.</p> <p>2.3 Market Signals and Forecasting Future Needs² The PPG requires an assessment of future needs based on current and robust data. Four approaches are identified:</p> <ol style="list-style-type: none"> 1. An econometric-based forecast of labour demand (EGA's preferred methodology); 2. A demographically-based forecast of labour supply (EGA); 3. A projection of past take-up rates (EGA); and/or 4. An assessment of future property market requirements (Savills). <p>These should be further informed by consultation with relevant business organisations and the evidence base as noted above, including longer term economic forecasts and scenarios. The forecasts can be converted to land and floorspace by using established employment densities and plot ratios³.</p> <p>2.4 Analysis of Current Market Demand⁴ The PPG states that existing stock should be compared with market requirements to identify any gaps or oversupply, informed by the other projections and forecasts noted above. This allows for any mismatch between any quantitative and qualitative supply of, and demand for, employment sites to be identified, including market segments that are under or over supplied.</p> <p>2.5 Assessing the Need for Allocated Land for Logistics⁵ The PPG contains specific guidance on assessing the future needs and land to be allocated for logistics, given its crucial role in enabling efficient, sustainable and effective supply of goods for consumers, and its specific locational requirements. The approach requires:</p> <ul style="list-style-type: none"> • An understanding of the needs for logistics developers and suppliers; • An analysis of market signals such as trends in take-up and availability; • An analysis of economic forecasts with regard to changes in demand and economic growth; • Engagement with the Local Enterprise Partnership (LEP), including reference to its strategies and the Local Industrial Strategy; and

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			<ul style="list-style-type: none"> • A consideration of appropriate locations to meet future needs, including for market segments such as SMEs and last-mile providers. <p>This work is essentially a sector-specific (logistics) market-informed assessment of future market demand or needs as identified in the guidance noted at Paragraph 2.3.1 (4) above. Savills' demand methodology is considered to be NPPF-compliant as it builds upon historic take-up (net absorption), adjusting past trends for historic supply shortages and the subsequent loss in demand. We refer to this as 'suppressed demand' which is added to the historic demand trend as a top-up, and is used to estimate future I&L demand that should be planned for in the Draft Crawley Borough Local Plan.</p> <p>3 Review of Employment Evidence</p> <p>3.1 Introduction</p> <p>This section reviews the most recent local authority employment evidence covering Crawley Borough Council. The focus of our review is the future demand estimates for I&L floorspace and land.</p> <p>Crawley Borough Council commissioned Lichfields to prepare supplementary economic evidence for the Draft Local Plan that updates the Northern West Sussex Economic Growth Assessment (EGA) (January 2020), alongside the Focused Update report (September 2020) also produced by Lichfields.</p> <p>Our review of the EGA Supplementary Update for Crawley (2023) highlights a number of observations, and we consider the employment evidence to underestimate the future demand for I&L land in Crawley.</p> <p>3.2 Economic Growth Assessment (EGA) Supplementary Update for Crawley (2023)</p> <p>Progress on the Local Plan has been delayed as a result of ongoing water neutrality issues in the area. Given the extended timescales, alongside the significant changing economic circumstances affecting both the national and local economy, Crawley Borough Council has identified a requirement for some partial updating of the employment evidence.</p> <p>The EGA (2023) considers demand for employment land and floorspace (Use Class E(g), B2, and B8) in Crawley over an 18 year period 2023-2040, drawing on two sets of employment forecasts, latest completions data, and housing delivery assumptions. The term 'industrial space' is used to refer to both manufacturing (E(g)(iii)/B2) and warehouse and distribution (B8) uses. Savills uses the terms I&L to cover the same uses as explained in Section 1.4.</p> <p>The EGA (2023) develops a number of potential future economic scenarios to provide an updated framework for considering future economic growth needs and employment space requirements in Crawley up to 2040, drawing upon:</p> <ul style="list-style-type: none"> • Projections of employment growth in the office, industrial and distribution based sectors (labour demand) derived from economic forecasts produced by Oxford Economics (OE) and Experian in 2022;

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			<ul style="list-style-type: none"> • Consideration of past trends in completions of employment space based on the West Sussex County Council (WSCC) Commercial, Industrial, and Leisure Land Availability (CILLA) data; and • Estimates of future growth of local labour supply based on the Council's latest housing delivery trajectory and demographic assumptions. <p>The starting point was a detailed analysis of the latest (i.e. 2022 Q4) OE and Experian employment forecasts for Crawley which reflect more contemporary macroeconomic factors when compared to the forecasts considered at the time of the 2020 EGA and 2020 Focussed Update. These include the effects of the Covid-19 Pandemic, the war in Ukraine, and current pressures in terms of inflation and the potential for a period of recession in the UK economy, and cover the revised Plan Period.</p> <p>This analysis suggests that the Experian forecasts provide the most appropriate basis for considering future employment land requirements from a labour demand perspective, in part because they better align with the trend-based growth in Crawley as recorded by ONS BRES. While the forecasts deviate significantly in terms of overall job growth for Crawley (i.e. across all sectors of the economy), the differences are comparatively modest when only those sectors directly influencing demand for office, industrial, and warehousing sectors are considered.</p> <p>The updated scenarios generate gross employment floorspace requirements that range from 113,351 sq.m (or 26.2 ha) to 299,362 sq.m or (69.0 ha) over the 2023-2040 period. This range includes an allowance of 10% applied to all positive requirements to reflect normal levels of market vacancy, and a 10% 'buffer' allowance for such factors as delays in development sites coming forward, and replacement of some ongoing losses of employment space during the Local Plan period.</p> <p>As a minimum, it is considered that the Council should seek to accommodate the requirements related to the labour demand of 113,390 sq.m (26.2 ha). Therefore the Draft Local Plan employment land requirement (Paragraph 9.14) is identified based upon Experian Q4 2022 Baseline Job Growth projections, representing the most appropriate basis for considering future employment land requirements from a labour demand perspective. The forecast for a minimum of 26.2 ha within Crawley to 2040 is significantly within the industrial sectors, where taking account of forecast declines in the Light & General Industrial sectors, a floorspace need of 91,620 sq.m (22.9 ha) is identified. Table 3.1 presents the gross employment requirements in Crawley for the 18 year period 2023 to 2040.</p>

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Table 3.1 Gross Employment Requirements in Crawley (2023 to 2040)

Type of Space	Labour Demand (Experian 2022) Employment Requirements
Floorspace (sq.m)	
Office and R&D E(g)(i)/(ii)	21,770
Industrial E(g)(iii)/B2/B8	91,620
Total	113,390
Area (ha)	
Office and R&D E(g)(i)/(ii)	3.3
Industrial E(g)(iii)/B2/B8	22.9
Total	26.2

Source: EGA Supplementary Update for Crawley (Lichfields, 2023)

3.3 Savills Observations

Lichfields’ demand estimates comply with PPG in relation to the econometric-based forecast of labour demand, however fails to consider market demand signals directly as PPG requires. We therefore consider the preferred demand scenario used in the EGA (2023) to underestimate ‘true’ market demand. Below we outline what we consider to be some of the key observations of the labour demand methodology used.

Methodology

The labour demand method used by the EGA (2023) is not appropriate for the estimation of future I&L land demand, as employment forecasts often reflect the continued restructuring of the economy away from industry towards services, which underestimate the I&L sector’s performance. Further, changes to the I&L market mean that growth in floorspace/land is not accurately predicted by changes in jobs. The I&L sector does not comprise low-skilled and low-paid jobs, nor do I&L companies functions’ neatly fit into industrial or logistics.

I&L companies are increasingly co-locating office, research and development, and administrative functions with I&L operations. Such co-located employment is not well captured by labour demand models as these assume I&L activities are wholly accommodated within a narrow set of Standard Industrial Classification (‘SIC’) codes.

The underestimation of future demand from the labour demand model is apparent when historic jobs growth in the logistics sector are compared with future job projections from major statistics houses. With reference to **Figure 3.1** below, logistics jobs nationally have grown 23% over ten years. However, labour forecasting products, including Experian, East of England Forecasting Model (‘EEFM’) and Oxford Economics, predict much

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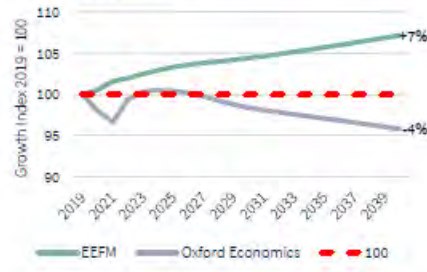
lower levels of growth, including negative growth, over the next 20 years (**Figure 3.2**). This does not reflect reality given logistics is performing strongly, with recent demand being 56% above the long term trend6.

In effect, the EGA has relied on statistical constructs to understand future ‘market’ demand rather than consider market demand signals directly.

Figure 3.1 Historic Growth in Logistics Jobs, England



Figure 3.2 Projected Growth in Logistics Jobs, England



Source: Savills (2023), LFS, EEFM, OE

Current and Future Growth Drivers are Not Accounted For

The EGA’s primary reliance on historic trends inevitably results in its future demand estimates underestimating future need, as it has not taken into account of modern day growth drivers. The labour demand method used by the EGA also takes no account of current and future growth drivers, that are, and continue to underpin I&L demand such as housing growth, increasing online retailing, growing freight volumes, increased desire for next day/same day deliveries etc. We discuss these major growth drivers further below.

GROWTH IN ONLINE RETAILING

The exponential growth in online retail is probably the most quantifiable of the major changes driving growth in the I&L sector. Statistics collected by the ONS from November 2006 show that the share of internet sales has consistently increased over time and it was at 19% before the onset of the Covid-19 Pandemic. During the pandemic, due to lockdowns and restrictions, this figure increased considerably and is around 25.2% as of April 20237. The growth in online retailing has significant implications on future I&L demand given that e-commerce requires around 3 times the logistics space of traditional bricks-and-mortar retailers8.

Most commentators agree that online retailing will continue to grow from a higher base than before the pandemic due to behavioural changes such as increased home working and continued demand for rapid parcel deliveries. Forrester Research, a respected source of future online retail projections, estimate that online retail will reach 37% of all retail sales by 20259. Growth to 50% of all sales is likely to happen at some point in the future. One

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such report, 'The Digital Tipping Point, 2019 Retail Report', estimated retail sales would reach 53% by 2038. While this timeframe appears too ambitious, the question appears to be more of 'when' rather than 'if'. By only projecting forward historic trends, the strong growth in online retailing, and its impact on future needs, has not been accounted for.

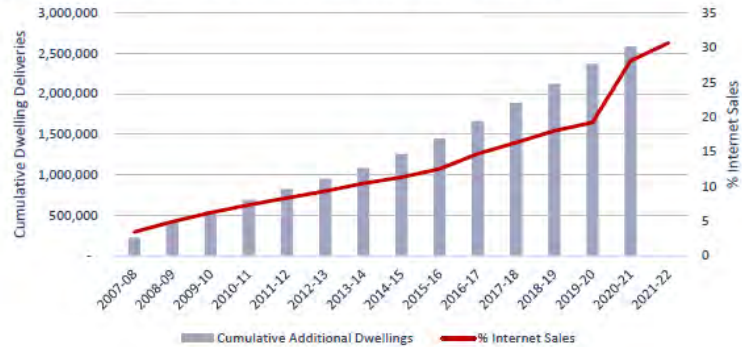
HOUSING GROWTH

This exponential growth in online retailing is both a function of the way we now live and the continued housing growth in the UK. As shown in **Figure 3.3**, housing growth at the national level has broadly tracked the growth in online retailing before the onset of the Covid-19 Pandemic, during which time online retailing has spiked even higher.

Between 2001 (further date that data was available) and 2022, the number of homes across Crawley has increased by 15%¹⁰. Online retailing relies on increased choice for the consumer and also increased delivery speeds to a location of people's choosing. This means that more inventory is required to be located nearer to the general population. This in turn has meant that more warehouse space is required both by online retailers but also traditional bricks and mortar retailers who are adapting their supply chains to compete.

The Draft Crawley Borough Local Plan 2024-2040 (2023) acknowledges Crawley's growing population, and that this will generate additional need for I&L floorspace. This will be in addition to the existing population continuing to grow their online spending. Again these modern day trends will not have been accounted for in the EGA.

Figure 3.3 Growth in Internet Sales and Dwelling Completions Since 2009



GROWTH IN UK FREIGHT

Freight volumes are another key growth driver of I&L floorspace. Freight arriving and leaving the UK needs to be stored, packaged and distributed via a network of freight handling infrastructure (i.e. ports, freight handling

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			<p>airports, rail freight interchanges and motorways), and conveniently located I&L premises in order to reach end customers. Freight volumes are forecast to grow significantly across all freight modes (Figure 3.4). Again the increase in freight volumes will not have been accounted for in the EGA.</p> <p>Figure 3.4 Forecast Increase in Freight by Transport Mode</p> <p>Source: DfT, MDS Transmodal for Network Rail, Boeing, DfT</p> <p>‘Suppressed Demand’ is Not Accounted For Nor Demand from London</p> <p>When supply, as signalled by floorspace availability, is low, demand is ‘suppressed’ as prospective tenants can’t find space in a market. 8% is typically referred to as the equilibrium level at a national level when supply and demand are broadly in balance (as sourced in publication such as the GLA’s Land for Industry and Transport SPG 2012). Below this level, available supply becomes tight and rents increase as occupiers compete for limited available stock.</p> <p>As we discuss in Section 4, Crawley has experienced availability below this equilibrium level between 2012 and 2021. The Lichfields FEMA has also been below the 8% equilibrium rate between 2013 and 2022, and the Savills FEMA has been below the equilibrium rate since 2014. This clearly indicates that Crawley and the Lichfields FEMA and the Savills FEMA have been supply constrained for a large part of the last decade with not enough available supply for the market to accommodate efficiently. A confirming factor of this conclusion is that rental growth has outpaced inflation by a significant margin (see Figure 4.7 in Section 4). Such strong rental growth is a by-product of strong occupier demand competing with one another for limited available stock. This competition pushes up rents. The EGA has taken no account of demand that has been lost due to supply constraints and therefore they present a demand profile based on a supply constrained historic trend (or ‘suppressed demand’).</p> <p>Savills have developed a methodology for estimating future I&L demand that addresses the issues raised above. Savills’ methodology (detailed in Section 5) is NPPG-compliant as it builds upon historic take-up (demand), adjusting past trends for historic supply shortages and the subsequent loss in demand where needed. As a final step for the Savills FEMA, it considers demand that is being lost from London and coming to Crawley due to former I&L sites being redeveloped for housing.</p>

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			<p>The consideration of displaced I&L land from London is considered an important consideration given Crawley's, and the Subject Site's proximity to London. A business could relocate to the Subject Site and still service its London customer base efficiently. The EGA does not quantify what impact this could have on future demand and subsequent need for further employment land allocations. In Section 5, we explain the Savills approach to estimating how much future demand from London should be planned for within the Savills FEMA and Crawley.</p> <p>4 Crawley's Lack of I&L Supply is Constraining Growth</p> <p>4.1 Introduction</p> <p>Within this section we consider the need for more I&L supply within the Lichfields FEMA, the Savills FEMA, and Crawley specifically. In order to understand need, we consider market supply and demand dynamics within the Lichfields FEMA and the Savills FEMA which we consider to be an appropriate representation of the sub-regional market within which Gatwick Green is located. The regional context is important given that future I&L investors and occupiers will consider the attractiveness of the Subject Site against other competing locations within the Lichfields FEMA and the Savills FEMA. New I&L investment and occupier demand will naturally flow to the strongest locations.</p> <p>The results of the analysis below clearly demonstrates that the Lichfields FEMA, the Savills FEMA and Crawley are experiencing demand at levels well above available supply. This demand / supply imbalance is particularly stark with regards to larger units above 250,000 sq.ft where availability is effectively zero.</p> <p>Gatwick Green is ideally placed to cater for larger unit demand and fill the current gap in the market.</p> <p>4.2 Functional Economic Market Area (FEMA)</p> <p>Before considering market supply and demand factors, we first need to define an appropriate FEMA. The FEMA needs to be relevant to Gatwick Green, namely it is the broad 'area of search' that the Subject Site sits within that prospective I&L occupiers will consider when looking to lease space. Effectively the FEMA includes the competitor locations to Gatwick Green for attracting this occupier demand.</p> <p>In order to define an appropriate FEMA for the Subject Site, we first consider Crawley's evidence base.</p> <p>The Northern West Sussex (NWS) EGA Update (2020) prepared by Lichfields states that the NWS operates as a broad FEMA, with the spatial extent largely consistent with the authority boundaries of Crawley, Horsham, and Mid Sussex. The more recent 2023 EGA reconfirms NWS as an appropriate FEMA.</p> <p>We agree that NWS forms part of Gatwick Green's FEMA, but we also consider that a large proportion of demand will come from occupiers that wish to service the London market or desire a location on the M23. The M23 also stops south of Crawley and becomes the A23 which will not appeal to all occupiers, particularly larger occupiers that generally want direct access to a motorway junction, rather than an A - road, which Gatwick Green provides.</p>

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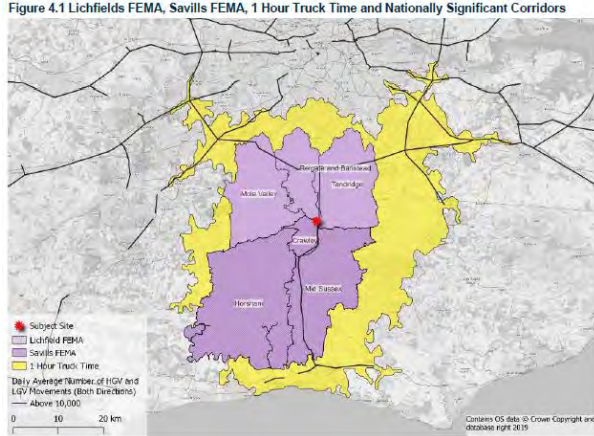
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An approach which builds on the NWS FEMA, and recognises that Crawley is ideally located between London and the south coast, is to extend the FEMA northwards to include most of the Gatwick Diamond. The Gatwick Diamond comprises the local authorities of Crawley, Epsom and Ewell Borough, Horsham District, Mid Sussex District, Mole Valley District, Reigate and Banstead Borough, together with Tandridge District. We consider Epsom and Ewell Borough should be excluded given these locations are within the M25 and will primarily service the London market only.

As seen from **Figure 4.1**, this extended geography broadly corresponds with a 1 hour truck time which represents the size of most occupiers’ supply chains linking themselves with their suppliers and customers. Obviously some companies will have a wider regional and national reach, but a 1 hour truck time will capture the majority of I&L businesses.

Savills therefore accepts the NWS FEMA as the basis for a suitable PMA for the Subject Site, but we also consider Mole Valley, Reigate and Banstead, and Tanbridge to be appropriate for inclusion within the PMA, and therefore review supply and demand factors for both FEMAs (‘Lichfields FEMA’ and ‘Savills FEMA’).

- **Lichfields FEMA:** Crawley, Horsham and Mid Sussex; and
 - **Savills FEMA:** Crawley, Horsham, Mid Sussex, Mole Valley, Reigate & Banstead, and Tandridge



4.3 Crawley, Lichfields FEMA, and Savills FEMA are supply constrained, especially for larger units

At the national level, 8% availability is commonly referred to as the level where a market is broadly in balance (i.e. equilibrium frictional capacity) in terms of supply and demand. This benchmark rate is found in several prominent publications such as the:

- GLA’s Land for Industry and Transport Supplementary Planning Guidance (SPG);

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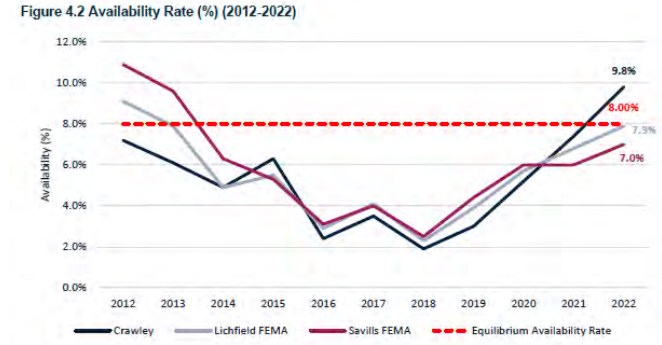
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- London Plan (2021); and
- British Property Federation ‘*Levelling Up – Logic of Logistics*’ report.

Below the 8% equilibrium availability rate, available supply becomes tight and rents increase as strong occupier demand compete for limited available stock. **Figure 4.2** shows that availability in Crawley has been below this level for most of the last decade between 2012 and 2021, only rising above this level in 2022 linked to the current macro-economic challenges. For the Lichfields FEMA and Savills FEMA, availability has been below the 8% equilibrium level consistently since 2013 and 2014 respectively.

This effectively means Crawley, the Lichfields FEMA and the Savills FEMA have been supply constrained in 10, 10 and 9 years of the last 11 years respectively. As a result demand will have been ‘suppressed’ as not all occupiers can find the space to meet their needs and are therefore either forced to remain in their existing premises, even if not ideal for their operational requirements, or alternatively have to leave the area to find suitable premises elsewhere, taking the jobs and investment they generate with them. Gatwick Green will help to respond to the supply-constrained market by providing 44 ha of prime I&L land directly adjacent to a nationally significant motorway and the UK’s 2nd largest airport.

Crawley’s current availability rate of 9.8% is partly impacted by 147,039 sq.ft and 88,708 sq.ft of available floorspace within the Base Redevelopment on Fleming Way, and a further 89,255 sq.ft of available floorspace at G Hub Crawley on Napier Way. All three of these units are of average quality. Given the increasing costs associated with running warehouses, it comes as no surprise that there is a greater demand for better quality buildings, with better Environmental, Social and Governance (ESG) features. It should be noted that one or even a few years of above equilibrium availability doesn’t fully compensate for a sustained period of tight supply in the face of strong demand.



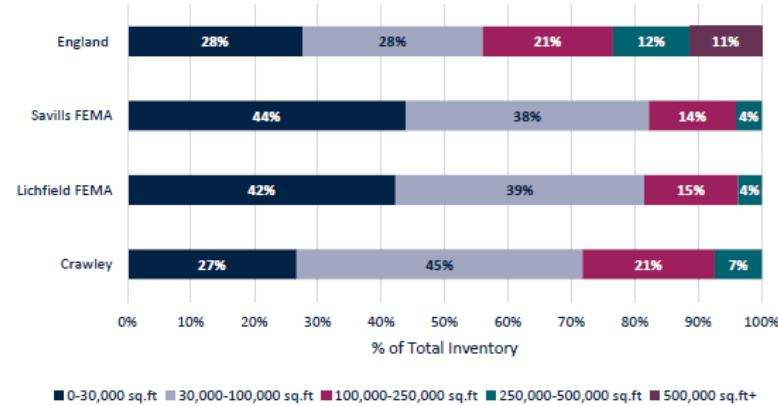
Source: CoStar, Savills 2023

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As shown in **Figure 4.3**, in terms of unit size, the Lichfields FEMA, the Savills FEMA and Crawley have a lack of supply of larger units relative to the England average. Units between 250,000 to 500,000 sq.ft represent 12% of total inventory across England but just 4% in the Lichfields FEMA and the Savills FEMA, and 7% in Crawley. The situation is even more stark for units above 500,000 sq.ft where the Lichfields FEMA, Savills FEMA and Crawley have no supply versus 11% across England. This lack of large unit supply is constraining growth in Crawley, Lichfields FEMA and the Savills FEMA given these larger size bands have accounted for 41% of all leasing demand (i.e. net absorption) in England over the last 5 years.

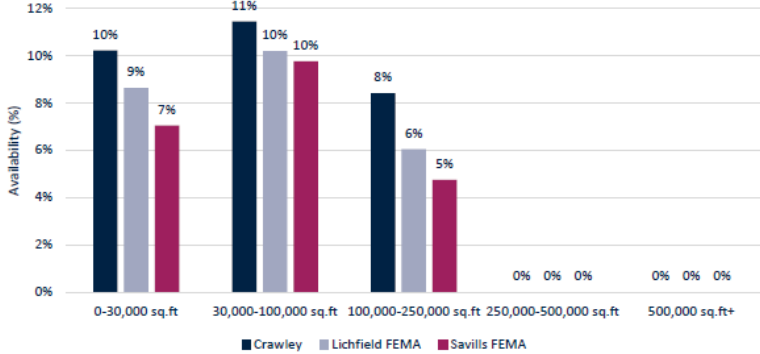
Figure 4.3 Size of Units as a % of Total Inventory (sq.ft)



Source: CoStar, Savills 2023

The lack of larger unit supply in the Lichfields FEMA, Savills FEMA and Crawley, coupled with the strong occupier demand for these size bands, has led to there being critically low availability. With reference to **Figure 4.4**, there is effectively no availability in the 250,000 to 500,000 sq.ft and 500,000 plus sq.ft size bands. Gatwick Green offers a large strategic site in a prime location that can facilitate the delivery of new high specification units above 250,000 sq.ft.

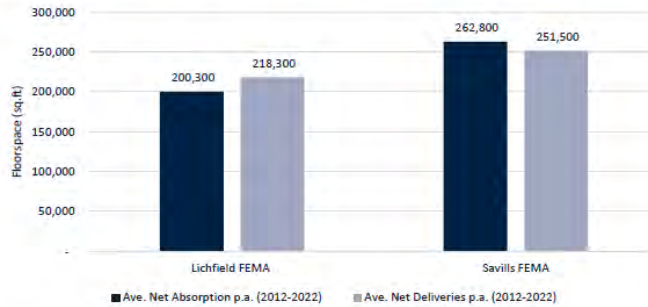
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			<p data-bbox="719 280 1032 304">Figure 4.4 Availability (%) by Size Band</p>  <table border="1" data-bbox="741 316 1498 671"> <caption>Figure 4.4 Availability (%) by Size Band</caption> <thead> <tr> <th>Size Band</th> <th>Crawley (%)</th> <th>Lichfield FEMA (%)</th> <th>Savills FEMA (%)</th> </tr> </thead> <tbody> <tr> <td>0-30,000 sq.ft</td> <td>10%</td> <td>9%</td> <td>7%</td> </tr> <tr> <td>30,000-100,000 sq.ft</td> <td>11%</td> <td>10%</td> <td>10%</td> </tr> <tr> <td>100,000-250,000 sq.ft</td> <td>8%</td> <td>6%</td> <td>5%</td> </tr> <tr> <td>250,000-500,000 sq.ft</td> <td>0%</td> <td>0%</td> <td>0%</td> </tr> <tr> <td>500,000 sq.ft+</td> <td>0%</td> <td>0%</td> <td>0%</td> </tr> </tbody> </table> <p data-bbox="719 691 913 708">Source: CoStar, Savills 2023</p> <p data-bbox="698 740 1568 770">4.4 Demand has been outstripping supply, especially for larger units</p> <p data-bbox="698 772 1980 863">Net absorption is a leading measure of demand that is based on lease deals. It compares occupied space (move-ins) versus vacated space (move-outs). On the other hand, net deliveries is a measure of supply, and registers the change in inventory (floorspace) related primarily to new developments.</p> <p data-bbox="698 879 2029 1034">In the Lichfields FEMA over the last decade, average levels of net deliveries (supply) has slightly exceeded the average levels of net absorption (demand). However average levels of net absorption has exceeded the average levels of net deliveries across the Savills FEMA (Figure 4.5). This demonstrates that the Lichfields FEMA is the weaker of the markets, and confirms Savills' view that the Lichfields FEMA only looks south, and that Crawley's full FEMA should also be north facing towards London (Savills FEMA).</p> <p data-bbox="698 1050 2024 1141">For larger units above 250,000 sq.ft specifically (Figure 4.6), average levels of net absorption has exceeded the average levels of net deliveries across the Lichfields FEMA and the Savills FEMA, which suggests that demand has been outstripping supply for these larger units.</p> <p data-bbox="698 1157 2018 1187">Gatwick Green represents a prime opportunity to facilitate the delivery of large units where need is the greatest.</p>	Size Band	Crawley (%)	Lichfield FEMA (%)	Savills FEMA (%)	0-30,000 sq.ft	10%	9%	7%	30,000-100,000 sq.ft	11%	10%	10%	100,000-250,000 sq.ft	8%	6%	5%	250,000-500,000 sq.ft	0%	0%	0%	500,000 sq.ft+	0%	0%	0%
Size Band	Crawley (%)	Lichfield FEMA (%)	Savills FEMA (%)																								
0-30,000 sq.ft	10%	9%	7%																								
30,000-100,000 sq.ft	11%	10%	10%																								
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250,000-500,000 sq.ft	0%	0%	0%																								
500,000 sq.ft+	0%	0%	0%																								

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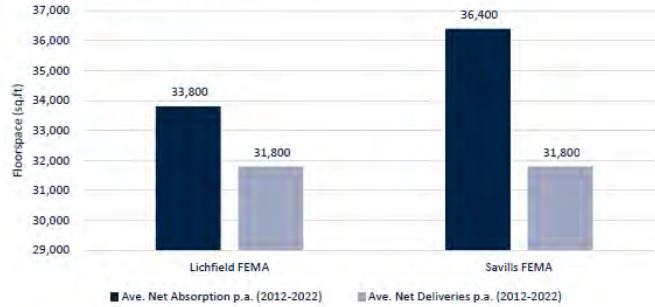
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Figure 4.5 Lichfields FEMA and Savills FEMA Net Absorption vs. Net Deliveries p.a. (sq.ft) (2012-2022)



Source: CoStar, Savills 2023

Figure 4.6 Lichfields FEMA and Savills FEMA Net Absorption vs. Net Deliveries p.a. (sq.ft) in Units over 250,000 sq.ft (2012-2022)



Source: CoStar, Savills, 2023

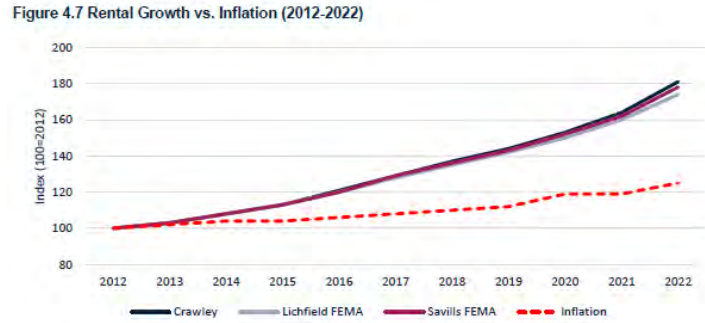
4.5 The demand/supply imbalance has led to exponential rental growth

A key by-product of demand outstripping supply is strong rental growth as occupiers compete for limited available stock which in turn drives up rents. Conversely when there is sufficient supply to accommodate demand, rental growth is lower and typically tracks inflation more closely.

Figure 4.7 below shows that rents have grown well above inflation across Crawley, Lichfields FEMA and Savills FEMA, at 81%, 74% and 78% respectively between 2012 and 2022. These levels are over three times the rate of inflation over the same period.

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Source: CoStar, Savills 2023

5 Savills' Future Demand Estimates

5.1 Introduction

The purpose of this section is to estimate future I&L land demand in the Lichfields FEMA and Savills FEMA, and then apportion this wider sub-regional demand to Crawley. This is then compared against the estimated demand stated in the EGA Supplementary Update for Crawley (2023).

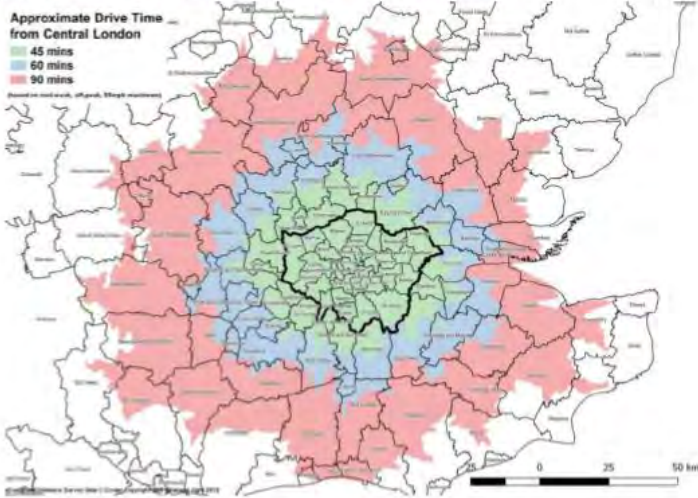
We present below Savills' full methodology for estimating future I&L demand. Our methodology is considered to address the methodological issues we raised against the EGA (2023) in **Section 3**. Our methodology complies with the approach to assessing future market demand for I&L in PPG as it builds upon historic take-up (net absorption), adjusting past trends for historic supply shortages and the subsequent loss in demand. We refer to this as 'suppressed demand' which is added to the historic demand trend as a top-up. For the Savills FEMA, as a final step we consider demand that is being lost from London due to former I&L sites being redeveloped for housing. This is a London-wide phenomenon as a result of acute housing shortages. The Savills FEMA by way of its adjacency to South London is a prime candidate to pick up I&L demand that has been displaced from London.

We consider two different scenarios for estimating future I&L demand in Crawley:

- Using the Lichfields FEMA (Crawley, Horsham, and Mid Sussex). This demand estimate does not include demand being lost from London; and
- Using the Savills FEMA (Crawley, Horsham, Mid Sussex, Mole Valley, Reigate & Banstead, Tanbridge). This demand estimate considers demand that is being lost from London due to former I&L sites being redeveloped for housing. The Savills FEMA by way of its adjacency to South London is a prime candidate to pick up I&L demand that has been displaced from London.

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			<p>Savills' full methodology usually considers the effect of e-commerce on future demand for I&L land. However, to be conservative, these two scenarios do not include additional demand from the predicted increase in e-commerce into the future which would likely increase future demand further.</p> <p>Based on Savills' demand methodology, over an 18 year period which is consistent with the EGA (2023), the first run of the model using the Lichfields FEMA estimates I&L demand within Crawley to be 69 ha of land. The second run of the model uses the Savills FEMA and includes the effects of demand being lost from London, which estimates I&L demand within Crawley to be 118 ha of land. The EGA (2023) considers a range of scenarios that generate gross employment land requirements between 22.9 ha to 60.2 ha for industrial uses over the period 2023 to 2040. As a minimum it is considered that the Council should seek to accommodate the requirements related to labour demand, which equates to 22.9 ha for industrial uses over the 2023 to 2040 period. This minimum employment land requirement of 22.9 ha for industrial uses is referenced in the Draft Crawley Borough Local Plan 2024-2040 (2023).</p> <p>5.2 Savills' Estimate of Future I&L Demand</p> <p>We present below Savills' full methodology for estimating future I&L demand. Our methodology is considered to address the issues we raised against the employment study in Section 3. Our methodology is compliant with the requirements of the Planning Practice Guidance ('PPG') as it:</p> <ul style="list-style-type: none"> Analyses 'market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies'¹¹. If a market is identified as being supply constrained (i.e. demand exceeds supply) such as Crawley, the Savills' model supplements the historic demand profile accounting for suppressed demand (i.e. demand lost due to historic supply constraints). <p>Based on the above, we consider the Savills model to represent industry best practice. It has been endorsed by the British Property Federation ('BPF') in our '<i>Levelling-Up – The Logic of Logistics</i>' report, and was shortlisted for an RTPI Award for Research Excellence 2022. The BPF Industrial Board, who commissioned the report, consists of many of the major investors and thought leaders in the I&L sector including St Modwen, The United Kingdom Warehousing Association, IM Properties, Newlands Developments, Segro, GLP, Tritax Symmetry and the BPF itself. The report has also been referenced as part of the Government's recently published 'Future of Freight Plan' and has been the focus of several discussions with senior officers at DLUHC and DfT.</p> <p>Taking a sub-regional approach to estimate demand</p> <p>We take a sub-regional approach to estimating future I&L demand. Crawley like all local areas is part of a wider sub-regional market, or FEMA, and therefore is subject to supply and demand forces which need to be assessed beyond its local authority boundaries. This is true for many commercial sectors, but it is particularly important for I&L occupiers which typically have distribution networks linking their customers and suppliers of between 1 to 4 hours' travel time, sometimes longer, depending on their size i.e. up to 4 hours plus is more typical of very large companies with a national reach, while 1 to 2 hours' drive time is ideal for the majority of companies. Given</p>

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			<p>Crawley's proximity to London, we consider many companies that would want to locate here would service London and surrounding areas south of the M25. For this reason, most would have a supply chain of at least 1 to 2 hours' drive time.</p> <p>The <i>2017 London Industrial Land Demand Study</i>¹² provided an indication of the potential to service the London economy from outside by illustrating drive time catchments to Central London. As illustrated by the map in Figure 5.1, Crawley is contained within the 60 minute drive time catchment from Central London, which makes it ideally located to attract demand from I&L occupiers who service the London economy.</p> <p>Figure 5.1 Drive Time Catchment Areas to Service Central London</p>  <p><i>Source: CAG, 2017</i></p> <p>The demand estimate using Lichfields' FEMA does not consider additional demand from London, and therefore considers the first bullet point below only. Our estimation of Crawley's I&L demand apportioned from the Savills FEMA also includes additional demand from London, and therefore considers both bullet points stated below.</p> <ul style="list-style-type: none"> • Calculate the 'within Lichfields FEMA' and 'within Savills FEMA' demand: Firstly we consider future demand from within the Lichfields FEMA and Savills FEMA. We consider these geographies as broadly representative of Crawley's subregional market. Our future demand calculations within the Lichfields FEMA and Savills FEMA includes 'suppressed demand' or demand lost historically due to supply constraints.

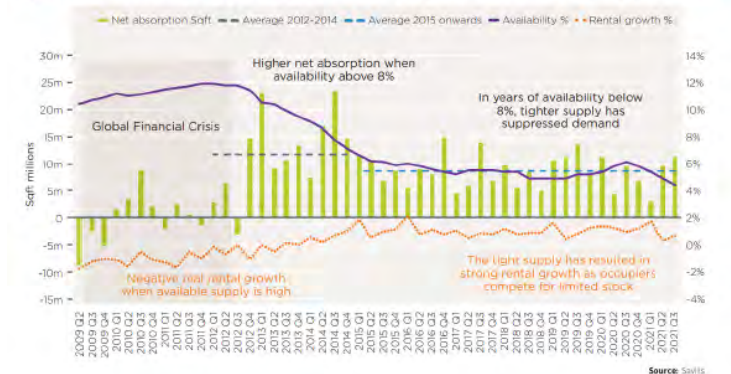
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			<p>• Estimate additional demand from London: Secondly for the Savills FEMA demand calculations we consider I&L supply and by extension demand that has, and is, being lost in London as former sites are being redeveloped for housing and mixed use developments. According to the <i>London Industrial Land Demand Study</i>¹³, between 2006 and 2015 London's loss of industrial employment land averaged 96 ha per annum, increasing to 106 ha per annum for the more recent 2010 to 2015 period. The <i>Industrial Land Supply and Economy</i>¹⁴ recognises that 'industrial land at accessible locations on the periphery to London and more widely across the South East could play an increasingly important role in supporting the functioning of London's economy, and support demand for land and premises from London's industrial businesses'. Both studies are supporting employment evidence bases to the adopted London Plan.</p> <p>We consider the full market for I&L units, estimating demand for all unit sizes and relevant planning use classes covering light industrial, manufacturing and warehousing. This is considered a more robust approach as it relies on a larger pool of data, and the fact light industrial, manufacturing, and warehousing occupiers desire similar types of premises with similar locational characteristics.</p> <p>The steps we follow in estimating future I&L land demand are outlined below:</p> <p>Step 1: Estimating demand over the Local Plan period We assume an 18-year plan period which is consistent with the EGA (2023).</p> <p>Step 2: Estimating historic demand This is based on the average annualised net absorption for the Lichfields FEMA and Savills FEMA (from Section 4) at 200,300 sq.ft per annum and 262,800 sq.ft per annum respectively between 2012 and 2022. Savills considers net absorption to be the leading measure of demand for floorspace as it indicates the quantum of net floorspace occupied over a period of time (i.e. move-ins minus move-outs) based on lease deals.</p> <p>We do not consider land take-up/completions as an accurate measure of demand. Development completions is a supply measure which primarily depends on new land being allocated as part of the Local Plan process, followed by the grant of planning permission before new development is constructed. This is a lengthy process which explains why completions (new supply) typically lags demand (net absorption) as it has been the case in the Savills FEMA. Using net absorption rather than completions results in a higher historic demand profile. For example, as we discussed in Section 4, average net absorption per annum was 4% higher than the average net deliveries per annum in the Savills FEMA between 2012 and 2022 respectively.</p> <p>Step 3: Estimation of suppressed demand The rationale for accounting for suppressed demand is that when sufficient supply isn't available, demand cannot be accommodated. This is the top up figure to be added to the historic demand (net absorption) trend to account for years when the market was supply constrained.</p>

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			<p>Supply and demand are inextricably linked across all commercial property sectors. Put simply, if demand exceeds supply, rents typically rise more quickly as occupiers vie for limited available stock. This can have a number of wider implications. For example, new companies aren't able to move into a market area, nor are existing companies able to find new space if their floorspace needs change, for instance, due to expansion. It may also happen that some existing local companies get priced out of the market as they cannot afford the increasing rents. As a result, companies have to locate to areas that are not ideal in terms of serving their customer base, thereby increasing travel times and the costs of doing business, not to mention environmental impacts. The lack of supply may also mean companies are forced to occupy space that is not entirely suitable for their operational needs impacting productivity.</p> <p>We describe a market where supply doesn't keep up with demand as being 'supply-constrained'. Limited supply in a strongly performing market, such as the I&L sector in the Lichfields FEMA and the Savills FEMA, mean that demand cannot be fully satisfied, typically resulting in strong rental growth. As demonstrated in Section 4, the Lichfields FEMA's and Savills FEMA's I&L rents have increased by 74% and 78% respectively, between 2012 and 2022, indicating new supply has struggled historically to keep pace with the strong demand. This is three times the rate of inflation over the same period¹⁵.</p> <p>At the national level the market equilibrium level where supply and demand are broadly in balance and rents are more stable, is around 8% availability. This benchmark rate is found in a number of prominent publications such as the GLA's Land for Industry and Transport Supplementary Planning Guidance (SPG).</p> <p>If one studies real rental growth (i.e. rental growth adjusted for inflation) over the past decade at the national level and observes its relationship to availability, it becomes clear that I&L rents begin to grow strongly when availability is below 8%. This relationship is clearly illustrated in Figure 5.2 below. When availability was above 8% between 2009 and 2014 real rental growth (net of inflation) was either negative or only slightly positive. This enabled demand to be accommodated as sufficient supply was available.</p> <p>However, since 2014, as availability dipped below 8% and has stayed below this level ever since at the national level, real rents have grown strongly year-on-year. During this period net absorption has been lower than the 2009-2014 period despite the I&L sector going from strength to strength. This clearly shows the suppressing nature tight availability (below 8%) has had on I&L demand nationally.</p>

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Figure 5.2 Historic Net Absorption (sq.ft), Availability (%) and Real Rental Growth (%) in England



The 8% benchmark is also applicable to the Lichfields FEMA and the Savills FEMA given the I&L markets have broadly followed the same trajectory as the national market. I&L availability dropped below the 8% equilibrium level in 2013 in the Lichfields FEMA, and 2014 in the Savills FEMA (see **Section 4, Figure 4.2**), similar to the national market.

In terms of I&L rents, the FEMAs began outpacing inflation from around 2013 when availability dropped below 8% (see **Section 4, Figure 4.7**), again similar to the national market.

The individual steps for calculating the FEMAs' suppressed demand are as follows:

- **Step 3a:** For years where availability has been below the 8% equilibrium threshold, we calculate the quantum of floorspace necessary to achieve 8% availability (Column 'Av. To EQ (sq.ft)' in **Table 5.1** and **Table 5.2**, calculation F);
- **Step 3b:** We then take the average of the ratio between net absorption and available floorspace for every year over the past decade (Calculation E averages 36% for the Lichfields FEMA and 32% for the Savills FEMA based on Column 'Net Absorption/Availability');
- **Step 3c:** We apply this average to the estimated floorspace required to reach 8% availability in each year where the market is below the 8% availability threshold to estimate each period's suppressed demand (Calculation F*E in Column 'Suppressed Net Absorption (sq.ft)');
- **Step 3d:** We calculate average suppressed net absorption over the past decade. This gives the annualised suppressed demand figure to be used as a top-up to the historic trend. The estimated average suppressed demand figure for the Lichfields FEMA is 113,800 sq.ft per annum since 2012, and 149,900 sq.ft per annum for the Savills FEMA.

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Table 5.1 and Table 5.2 show the relevant calculations for the two geographies.

Table 5.1 Suppressed Demand Calculations within the Lichfields FEMA

	A	B	C=(A*B)	D	D/C	F=(8%-B)*A	F*E
Year	Inventory (sq.ft)	Availability (%)	Availability (sq.ft)	Net Absorption (sq.ft)	Net Absorption/ Availability	Av. To EQ (sq.ft)	Suppressed Net Absorption (sq.ft)
2022	16,490,991	7.9%	1,302,788	306,403	24%	16,491	5,984
2021	15,657,642	6.8%	1,064,720	-92,720	-9%	187,892	0
2020	15,734,811	5.7%	896,884	136,713	15%	361,901	131,332
2019	15,438,753	3.9%	602,111	152,174	25%	632,989	229,709
2018	15,256,105	2.3%	350,890	693,634	198%	869,598	315,573
2017	14,745,121	4.1%	604,550	-71,645	-12%	575,060	0
2016	14,637,037	2.9%	424,474	232,769	55%	746,489	270,897
2015	14,591,223	5.5%	802,517	324,832	40%	364,781	132,377
2014	14,303,566	4.9%	700,875	313,310	45%	443,411	160,911
2013	14,054,929	7.9%	1,110,339	149,606	13%	14,055	5,100
2012	14,047,789	9.1%	1,278,349	58,035	5%	-154,526	0

E = Average

Suppressed Demand = Average

Source: Savills, CoStar

Table 5.2 Suppressed Demand Calculations within the Savills FEMA

	A	B	C=(A*B)	D	D/C	F=(8%-B)*A	F*E
Year	Inventory (sq.ft)	Availability (%)	Availability (sq.ft)	Net Absorption (sq.ft)	Net Absorption/ Availability	Av. To EQ (sq.ft)	Suppressed Net Absorption (sq.ft)
2022	22,290,244	7.0%	1,560,317	221,350	14%	222,902	70,216
2021	21,479,802	6.0%	1,288,788	-27,675	-2%	429,596	0
2020	21,556,971	6.0%	1,293,418	242,309	19%	431,139	135,813
2019	21,187,476	4.4%	932,249	204,158	22%	762,749	240,273
2018	20,809,357	2.5%	520,234	761,066	146%	1,144,515	360,533
2017	20,244,299	4.0%	809,772	6,693	1%	809,772	255,086
2016	20,118,903	3.1%	623,686	382,465	61%	985,826	310,545
2015	20,073,089	5.3%	1,063,874	410,207	39%	541,973	170,727
2014	19,739,126	6.3%	1,243,565	383,319	31%	335,565	105,706
2013	19,500,977	9.6%	1,872,094	249,173	13%	-312,016	0
2012	19,493,837	10.9%	2,124,828	57,437	3%	-565,321	0

E = Average


Suppressed Demand = Average

Step 3e: The final step requires adding the combined annualised historic and suppressed demand figures, and multiplying this by the number of years in the plan period (18 years), as shown in **Table 5.3**. This gives a total

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			<p>floorspace demand of 5.7 million sq.ft for the Lichfields FEMA and 7.4 million sq.ft for the Savills FEMA over an 18-year plan period.</p> <p>Table 5.3 Total Historic and Suppressed Demand Calculations</p> <table border="1"> <thead> <tr> <th></th> <th>Lichfields FEMA (sq.ft)</th> <th>Savills FEMA (sq.ft)</th> </tr> </thead> <tbody> <tr> <td>(A) Annualised historic demand</td> <td>200,300</td> <td>262,800</td> </tr> <tr> <td>(B) Annualised suppressed demand</td> <td>113,800</td> <td>149,900</td> </tr> <tr> <td>(C) Total annualised demand (A+B)</td> <td>314,100</td> <td>412,700</td> </tr> <tr> <td>(D) Total demand over 18 year plan period (C*18)</td> <td>5,653,600</td> <td>7,428,100</td> </tr> </tbody> </table> <p><i>Source: Savills; figures may not add up due to rounding</i></p> <p>Step 4: Savills Estimate of Future I&L Demand Across the Lichfields FEMA and Savills FEMA Adding the combined historic and suppressed demand estimates yields a total demand of 5.7 million sq.ft for the Lichfields FEMA, and 7.4 million sq.ft for the Savills FEMA over the plan period, as summarised in Table 5.3.</p> <p>The EGA uses a plot ratio of 40% for industrial uses to translate floorspace to land needs. Based on our experience, recent changes in the I&L sector mean that occupiers are moving towards larger building footprints and requiring lower site coverage to allow for adequate yard space, cross-docking, sustainable urban drainage, and strategic landscaping. These modern occupier requirements imply a lower plot ratio, typically in the region of 30% to 40%. Savills considers a 40% plot ratio as appropriate. Using a 40% plot ratio, over an 18 year plan period, we estimate Lichfields FEMA-wide I&L demand to be 131 ha of land, and Savills FEMA-wide I&L demand to be 173 ha of land.</p> <p>Step 5: Accounting for lost demand from London The proximity of the Savills FEMA to London means that some of the Savills FEMA demand will arise from the need to service London's economy, in the context of sustained diminishing industrial employment land in the capital¹⁶. Between 2006 and 2015, London lost industrial employment land at an average of 96 ha per annum¹⁷, increasing to 106 ha per annum for the more recent 2010 to 2015 period.</p> <p>This is not due to London's lack of demand for I&L uses, especially given that the capital's population continues to grow and the increase in online shopping will need to be supported by appropriate I&L. The continued loss of I&L land is primarily a consequence of housing pressures which have been pushing I&L activities outside of London.</p>		Lichfields FEMA (sq.ft)	Savills FEMA (sq.ft)	(A) Annualised historic demand	200,300	262,800	(B) Annualised suppressed demand	113,800	149,900	(C) Total annualised demand (A+B)	314,100	412,700	(D) Total demand over 18 year plan period (C*18)	5,653,600	7,428,100
	Lichfields FEMA (sq.ft)	Savills FEMA (sq.ft)																
(A) Annualised historic demand	200,300	262,800																
(B) Annualised suppressed demand	113,800	149,900																
(C) Total annualised demand (A+B)	314,100	412,700																
(D) Total demand over 18 year plan period (C*18)	5,653,600	7,428,100																

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			<p>The 2011 <i>London Industrial Land Demand Study</i>¹⁸ already concluded that an increasing proportion of London's logistics needs were being serviced from outside of the capital. The 2017 London Industrial Land Demand Study expected this trend to continue. The study also provided an indication of the potential to service the London economy from outside by illustrating drive-time catchments to Central London (Figure 5.1). As illustrated by the map, the Savills FEMA is mostly contained within the 90 minute drive time catchment or less from Central London, which makes it ideally located to attract demand from I&L occupiers who service the London economy.</p> <p>We have reviewed demand estimates from the 2017 <i>London Industrial Land Demand Study</i> for London's South, Central, East and West sub-regions (Figure 5.3). These are the sub-regions which we consider the Savills FEMA is most likely to pick up demand from due to its geographic proximity.</p> <p>Figure 5.3 London Sub-Regions</p>  <p>Source: AECOM, 2015</p> <p>Five demand scenarios are presented for London as a whole and its various individual sub-regions. We consider the Baseline Scenario to be too optimistic: for example, the South and West sub-regions are estimated to experience net gains in I&L land (29.2 ha and 16.7 ha respectively). This contradicts what has occurred since the <i>London Industrial Land Demand Study</i> was published. Between 2015 and 2022, the South, Central, East and West sub-regions have lost 3 million sq.ft of floorspace¹⁹. For this reason, we discount the Baseline Scenario as being unrealistic, and out of kilter with the other 4 scenarios considered.</p> <p>We also disregard the potential Pipeline Scenario as it excludes strategic infrastructure projects, one of which, Crossrail 2, has already come forward and in doing so has resulted in the loss of I&L land.</p> <p>We also reject the Intensification & Substitution Scenario, as based on our experience, industrial intensification has been difficult to achieve in reality. Currently there is only one multi-storey shed in London being X2 in</p>

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			<p>Heathrow, and few others are in the pipeline. Much of the difficulty around multi-storey and intensified formats is viability and access to suitable yard space which is a key requirement for occupiers. This reality is acknowledged by the Secretary of State's direction from March 2020 to remove references from the Draft London Plan Policy E4 regarding the 65% plot ratio for new I&L developments in London. This extremely high plot ratio was the cornerstone of the Draft London Plan's no net loss of I&L floorspace aspiration.</p> <p>Based on the above analysis, we consider the 'Trend Supply' and 'Potential Pipeline + Infrastructure' to be the most realistic scenarios.</p> <p>Next we need to align how much of the future lost demand under these scenarios should be planned for in the Savills FEMA. In order to maintain a conservative approach, we have assumed that only a small portion of this displaced demand from London's South (25%), Central (10%), East (10%) and West (10%) subregions is captured by the Savills FEMA. We have applied a larger allocation for the South sub-region (25% versus 10%) due to its geographic proximity to the Savills FEMA. This yields a figure of 176 ha and 134 ha lost from London for the Trend Supply and Potential Pipeline + Infrastructure scenarios respectively. We take forward the midpoint of these two estimates which is 155 ha.</p> <p>The 155.1 ha loss of land from London over the 25 year period of CAG estimates, equates to an average of 6 ha per annum (rounded). Multiplying this annual figure by the 18-year period (6 ha per annum * 18 years) yields a total figure of 112 ha of lost demand from London that should be planned for within the Savills FEMA. This increases the land requirements in the Savills FEMA to 284 ha over the 18 year plan period. This includes the 112 ha of displaced demand that is being lost from London due to former I&L sites being redeveloped for other uses.</p> <p>Step 6: Future Lichfields FEMA and Savills FEMA demand apportioned to Crawley</p> <p>Within this section we seek to apportion the Lichfields FEMA and the Savills FEMA demand estimates to Crawley. This can be done in a number of different ways as follows:</p> <ul style="list-style-type: none"> • Based on Crawley's historic proportion of average demand (net absorption) between 2012 and 2022; • Based on Crawley's historic proportion of average net deliveries of new I&L floorspace between 2012 and 2022; and • Based on Crawley's current proportion of total I&L inventory in the Lichfields FEMA and Savills FEMA. <p>Savills consider it appropriate to take an average of the three indicators to apportion Lichfields FEMA wide demand to Crawley, and Savills FEMA wide demand to Crawley. This results in an apportionment level of 52% and 42% respectively.</p> <p>Based on Savills' demand methodology, over an 18-year period which is consistent with the EGA (2023), the first run of the model using the Lichfields FEMA estimates I&L demand within Crawley to be 69 ha of land. This</p>

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demand estimate does not include demand being lost from London, and to be conservative, excludes the effect of e-commerce.

The second run of the model using the Savills FEMA estimates I&L demand within Crawley to be **118 ha** of land. This demand estimate includes demand being lost from London, but to be conservative, excludes the effect of e-commerce. **Table 5.4** presents Crawley’s I&L market share of the Lichfields FEMA and the Savills FEMA.

Table 5.4 Crawley’s I&L Market Share of the Lichfields FEMA and Savills FEMA (sq.ft)

	Lichfields FEMA		Savills FEMA	
	Crawley % of Lichfields FEMA	Crawley Land Requirements (ha)	Crawley % of Savills FEMA	Crawley Land Requirements (sq.ft)
Average of historic demand, historic supply and inventory share	52%	69	42%	118

Source: CoStar, Savills

5.3 Comparing Savills Demand Estimates with the EGA (2023)

With reference to **Table 5.5**, Savills estimate of I&L demand in Crawley over the 18 year plan period is between 69 ha to 118 ha, significantly higher than the EGA (2023) estimate of 22.9 ha for industrial uses.

The reason for Savills’ estimates being larger is due to our methodology concentrating on market signals (in accordance with Paragraph 31 of the NPPF) which have underpinned the I&L sector’s strong growth and made it the best performing commercial sector in England over the last decade.

Table 5.5 Comparing Demand Estimates for Industrial Uses in Crawley over an 18 Year Period

	Ha
Savills Demand Estimates	
Lichfields FEMA Demand Estimates for Crawley	69
Savills FEMA Demand Estimates for Crawley	118
Council’s Employment Evidence Estimate	
Northern West Sussex EGA Supplementary Update for Crawley (2023) and referenced in the Draft Crawley Borough Local Plan (2023)	22.9

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			<p>Savills' much higher demand estimates clearly evidences a strategic scale site such as Gatwick Green is needed, and will attract substantial market interest.</p> <p>6 Why I&L Growth Should be Facilitated</p> <p>6.1 Introduction</p> <p>In this section we consider some of the key sectorial trends and reinforce the economic characteristics of the I&L sector and counter common misconceptions. We draw upon analysis from Savills' recent publication of the BPF's <i>'Levelling-up – The Logic of Logistics'21</i>, Savills' <i>Big Shed Briefings</i>, and other relevant research.</p> <p>Not only has the sector been outperforming other commercial sectors in the UK for some time, but it is also 'critical national infrastructure' supporting the functioning of our economy and the way we live our lives. The food we eat, the products and services we purchase, the materials used to build new homes and new infrastructure, even the vaccines that give us protection from Covid-19 are stored, manufactured and distributed from warehouses and factories to 'us' the end customer.</p> <p>The I&L sector enables the movements of goods across a multi-modal network of road, rail, air, and water routes. Most businesses draw on supply chains, many of which are global in scale, that rely upon these multiple modes of transport and on the transfer between freight nodes (such as ports, airports, rail freight interchanges and road) to warehouses, and then finally onto the end customer. Without these facilities and the increasingly efficient supply chains that link them with suppliers and end customers, the delivery of our purchases would be much slower, more expensive and we would have less choice.</p> <p>Current demand within the I&L sector is at unprecedented levels being supported by a number of key growth drivers. Given the current macro-economic challenges, it is vital to support those sectors which are proving to be resilient (such as I&L) and are therefore well-placed to provide new employment opportunities and mitigate job losses in other sectors.</p> <p>6.2 I&L is critical to Crawley's Economy</p> <p>According to the latest data from the ONS Business Register and Employment Survey (BRES), as of 2021, Crawley's I&L sector²² employs 28,000 people. This accounts for 32% of total employment in the area, which is over two times higher than the sector's share across England and Wales (13%). This clearly underlines the importance of I&L activities to Crawley's economy, even though these figures likely underestimate the sector's true employment levels given the diverse range of jobs it supports are not fully contained within the I&L related SIC codes.</p> <p>6.3 Resilience of the I&L Sector</p> <p>Current demand within the logistics sector is at unprecedented levels being supported by a number of key growth drivers as we discuss below. Given the current economic challenges, it is vital to support those sectors</p>

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			<p>which are proving to be resilient (such as I&L) and are therefore well-placed to provide new employment opportunities to mitigate job losses in other sectors and underpin the economic recovery.</p> <p>Given the struggles being faced by the office and retail sectors, I&L is likely to be the major generator of jobs for many local economies. In Crawley, the I&L sector²³ has experienced a job growth of 10% between 2015 and 2021. This is in contrast to 3% growth in office-based sectors²⁴, and no growth in the retail sector²⁵ over the same period²⁶. Unsurprisingly, logistics is one of the fastest growing segments within the Savills FEMA²⁷. Since 2015, employment in Transportation and Storage²⁸ in the Lichfields FEMA and the Savills FEMA has increased by 12% and 15%, and in warehousing²⁹ specifically by 35% and 18% respectively. This demonstrates that the I&L sector, particularly the logistics sector, is a growing segment of the economy with significant employment growth opportunities in Crawley.</p> <p>6.4 I&L growth is structural, not temporary</p> <p>It is often assumed that the effects of recent growth in e-commerce on I&L space demand is temporary. However Savills agree with the view of the National Infrastructure Commission³⁰ that e-commerce growth to 65% is plausible, however the timeframe of this growth to 2050 is arguably conservative. For instance a report titled 'The Digital Tipping Point, 2019 Retail Report'³¹ estimated retail sales would reach 53% by 2028. While this timeframe appears too ambitious, the questions appears to be more of 'when' rather than 'if' e-commerce will reach 50% or more of total retail sales. The growth in online shopping has significant implications on future I&L demand given that e-commerce requires around 3 times the logistics space of traditional bricks-and-mortar retailers³².</p> <p>It is not just e-commerce growth that is considered structural rather than temporary. So are consumer expectations for same-day or next-day delivery which have reshaped the operating models of logistics companies. It is extremely unlikely that we are going to see a U-turn on such expectations. For instance, the emergence of Zapp, Getir and Deliveroo who deliver groceries 'in minutes' while most of the major retailers such as Boots, Next and many more deliver next day. The Covid-19 Pandemic has accelerated this shift, a survey by Bringg³³ found that since the start of the pandemic, 27% of retailers added same-day delivery for online orders as a fulfilment option, and 1 in 3 retailers are planning to add same-day delivery options in the next 6 to 12 months.</p> <p>To enable fast deliveries, stock needs to be held near the end customer before it is picked up for the last mile. This requires I&L space in regional and local distribution hubs nearby to population centres. These trends are expected to increase demand for space, as reduced delivery times are expected to benefit online retailers.</p> <p>Finally, as the UK economy grows in terms of population and number of businesses, so will the need for I&L. These fundamental growth drivers (population plus business growth) are strong in Crawley and the South East region. For instance, over the next 20 years between 2023 and 2043, Crawley's resident population is expected</p>

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			<p>to grow by 4% (+ 4,800 people) and the South East’s resident population is expected to grow by 6%, an increase of 567,000 people³⁴.</p> <p>The increase in population will drive e-commerce growth while business growth will require supply chain support from I&L companies in terms of delivering supplies and materials used in business processes and/or to move products to end customers either locally, nationally, or internationally. The by-product of these relationships is increased freight flows. Significant growth is forecast across all freight modes (Figure 6.1). Freight arriving and leaving the UK needs to be sorted, packaged, and distributed via a network of freight handling infrastructure (i.e. ports, airports, rail freight interchanges and motorways) and conveniently located logistics premises in order to reach end customers.</p> <p>Figure 6.1 Projected Growth in Freight by Mode</p>  <table border="1" data-bbox="705 635 1646 813"> <caption>Figure 6.1 Projected Growth in Freight by Mode</caption> <thead> <tr> <th>Mode</th> <th>Forecast Period</th> <th>Projected Growth</th> </tr> </thead> <tbody> <tr> <td>LGV Traffic</td> <td>2019-2050</td> <td>between +29% and +108%</td> </tr> <tr> <td>Rail Traffic</td> <td>2019-2050</td> <td>+74% by 2043/44*</td> </tr> <tr> <td>Global Air Freight</td> <td>2019-2039</td> <td>+121% by 2039*</td> </tr> <tr> <td>Port Tonnage</td> <td>2019-2050</td> <td>+39% by 2050*</td> </tr> </tbody> </table> <p><i>Source: DfT, MDS Transmodal, Boeing, Savills</i></p> <p>While e-commerce and freight growth are two of the most influential factors driving I&L demand, there are several other demand drivers also at play. Figure 6.2 below provides a visual representation of some of the major demand drivers generating the record breaking demand within the sector.</p>	Mode	Forecast Period	Projected Growth	LGV Traffic	2019-2050	between +29% and +108%	Rail Traffic	2019-2050	+74% by 2043/44*	Global Air Freight	2019-2039	+121% by 2039*	Port Tonnage	2019-2050	+39% by 2050*
Mode	Forecast Period	Projected Growth																
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Port Tonnage	2019-2050	+39% by 2050*																

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Source: Savills

6.5 On-site job density is only a small part of I&L’s economic contribution

A common misconception about the I&L sector is that operations are land hungry and have a relatively low density in employment terms. This fails to recognise the wider role it plays in supporting jobs which are not physically within a warehouse but are enabled by the operations of a warehouse.

For instance, the sector’s wider supply chain employment is often overlooked in favour of the higher onsite job densities for retail and office uses. Logistics premises are a critical link in the chain alongside the key freight modes that allow goods to enter, leave and move around the country (i.e. ports, airports, rail freight interchanges and motorways). Like warehouses, these freight handling facilities generate employment to drive the planes, trains and boats as well as jobs involved in their maintenance and repair.

Jobs are also created at ports, airports and rail freight interchanges as part of their operation. The analysis of ONS Type 1 FTE multipliers for the Warehousing sector suggests that **for every 10 new warehousing jobs created, another 7 to 12 jobs are created offsite across the wider supply chain.**

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Figure 6.3 Wider Supply-Chain Jobs Across the Logistics Sector



Source: Savills

Another vital component of the logistic sector's 'economic story' is 'Indirect GVA'. Indirect GVA captures the impact that the logistics sector has on other segments of the economy. For example the services that a sector procures in support of its business activities trigger a GVA contribution by its suppliers, suppliers of suppliers and so forth, up the entire value chain. In simple terms, the logistics sector stores and distributes material and products used or sold by other companies as part of their operations. These inputs and outputs generate economic value that logistics has played a vital role in helping to realise. These relationships are shown dramatically in **Figure 6.4** below.


Figure 6.4 Indirect GVA and Logistics Operations



The indirect GVA generated by the logistics sector in the UK is 2.7 times higher than its direct GVA contribution. This is much higher than the indirect GVA generated by manufacturing (0.8), office (0.9) and retail (0.4) sectors (**Figure 6.5**). This illustrates the importance of logistics in facilitating other sectors of the economy. To impede its growth would undermine growth in other sectors of the economy too.

In terms of specific examples, the food we eat, the products and services we purchase, the materials used to build new homes and new infrastructure, as well as essential medical supplies, are stored and distributed from warehouses to 'us' the end customer. Without these facilities and the increasingly efficient supply chains that link

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			<p>them up with suppliers and end customers, the delivery of our purchases would be much slower, more expensive and we would have less choice.</p> <p>It is easy to overlook the critical role played by the I&L sector when everything is running smoothly. However, it is much easier to understand its importance when things don't work quite as well. The six-day blockage of the Suez Canal in March 2021 created a domino effect on global supply chains, which affected not only those sectors relying on container shipping, but also the transport sector as fuel vessels were delayed too. The shortage of HGV drivers in autumn 2021 led to fuel shortages in UK petrol stations and forced businesses to close down sites or cut production lines, adding to the backlog of production caused by the Covid-19 Pandemic.</p> <p>These realisations clearly indicate, not just the economy, but our daily life depends on the logistics sector. Its workers, stock of facilities and distribution networks are unquestionably 'critical national infrastructure' and should be planned for on this basis as we do with other key infrastructure such as roads, rail, ports and airports.</p> <p>Figure 6.5 Indirect GVA Generation by Final Product</p>  <table border="1"> <caption>Data for Figure 6.5</caption> <thead> <tr> <th>Final Product</th> <th>Indirect GVA Generation</th> </tr> </thead> <tbody> <tr> <td>Logistics</td> <td>2.7</td> </tr> <tr> <td>Office</td> <td>0.9</td> </tr> <tr> <td>Manufacturing</td> <td>0.8</td> </tr> <tr> <td>Retail</td> <td>0.4</td> </tr> </tbody> </table> <p><small>Source: Savills, ONS, Input Output Analytical Tables 2018</small></p> <p>6.6 Well paid and diverse jobs</p> <p>The I&L sector is subject to a number of misconceptions about average pay and skill levels. In Figure 6.6 below we compare the logistics and manufacturing sectors' annual wages against the median pay in all sectors using the latest ONS data from the Annual Survey of Hours and Earnings (ASHE). It shows that in the South East, jobs in logistics pay +£4,800 more than average per annum, and jobs in manufacturing pay +£5,300 more than average per annum.</p>	Final Product	Indirect GVA Generation	Logistics	2.7	Office	0.9	Manufacturing	0.8	Retail	0.4
Final Product	Indirect GVA Generation												
Logistics	2.7												
Office	0.9												
Manufacturing	0.8												
Retail	0.4												

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Source: ONS, ASHE, Savills

Moreover, the jobs offered within the sector are becoming increasingly diverse. **Figure 6.7** below shows the change in occupations in Transportation and Storage between 2011 and 2021 across the South East region.

Firstly, we can see that the share of higher-skill roles (Occupational Groups 1-3) has increased by 39%, with the biggest increase being in Professional Occupations, where the number of roles has increased by 97%. These roles are typically associated with higher-skilled engineering and technological professions in response to increased automation and robotics in the sector and more advanced supply chain processes.

Secondly there has been an increase in predominantly office-based roles (Occupational Groups 1, 2, 3, 4, 6 and 7), with occupations in these categories going up by 15% over the last decade. Office-based roles are increasingly co-locating alongside production and logistics uses as it is convenient for these people to be closer to the operations they control and analyse.

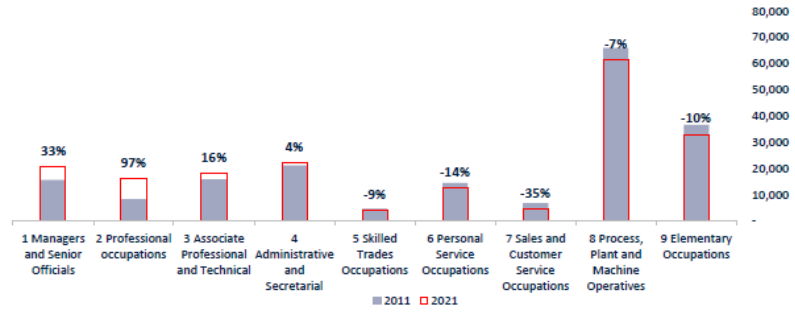
To conclude, the evidence presented in **Figure 6.7** tells us that there has been an overall increase in jobs, and that there is an on-going shift towards higher-skilled requirements in the sector.

The increasingly diverse range of occupations in logistics enables it to re-employ people who have lost their jobs in other sectors of the economy. For instance, a person that may have lost their jobs as an engineer or IT consultant within an office-based firm, can now find roles with a similar skills set in logistics.

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Figure 6.7 Occupational Distribution in Transportation and Storage (2011 vs 2021) – South East



Source: ONS APS, Savills

This increased occupational diversity means that the I&L sector can play an important role in re-employing people that have lost jobs in other sectors of the economy as a result of the Covid-19 Pandemic.

The Government’s Coronavirus Job Retention Scheme (CJRS) has helped cushion the impact of economic contraction on the job market. However, in spite of this effort, data on the Claimant Counts remain high in most areas of the country. The Claimant Count measures the number of people claiming benefit principally for the reason of being unemployed. As of May 2023, the Count across Crawley, Lichfields FEMA and the Savills FEMA totalled 2,935, 6,015, and 9,695 Claimants respectively. Compared to the Count in March 2020, this is 45% higher in Crawley, and 44% higher in both the Lichfields FEMA and Savills FEMA (+905, +1,845 and +2,970 Claimants respectively)³⁵.

The I&L sector also generates significant construction and apprenticeship roles which will increase further as it expands into the future. Savills estimate that if supply-constraints are addressed in the future, the sector could deliver over half a million apprenticeships over the next 10 years³⁶. This is extremely important given youth unemployment nationally stands at 10.7%³⁷, and between March 2020 and May 2023, the Claimant Count for ages 16-24 is 24% higher in Crawley, and 29% higher in both the Lichfields FEMA and the Savills FEMA. A number of case studies on the type of employment opportunities, training and research centres that the sector delivers can be found in our recent publication for the BPF ‘*Levelling-up – The Logic of Logistics*’³⁸.

6.7 Collaborating Sources

In spite of the macro-economic challenges facing all commercial sectors, the I&L sector has proved to be resilient and therefore well-placed to provide new employment opportunities and mitigate job losses in other sectors and underpin the economic recovery. It is not just Savills which recognises that I&L is critical national

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			<p>infrastructure that supports the functioning of our economy. Extracts from research undertaken by other property specialists are stated below:</p> <p>Lambeth Smith Hampton (LSH) Back into Balance Industrial and Logistics Market (2023)</p> <ul style="list-style-type: none"> • ‘Logistics property has a secure role to play in supporting economic activity, and stands in contrast with other property sectors, where levels of supply appear to be less than post-pandemic levels of demand’. • ‘Considering the economic and financial travails of 2022, UK-wide take-up hit an impressive 60.5 million sq.ft for the year, edging out 2020 to be the second strongest year on record behind 2021’s colossal performance’. • ‘While the growth of e-commerce will continue to underpin demand, the focus has shifted from raw expansion to optimisation of supply chains. Demand will reflect a growing emphasis on improving both supply chain efficiencies and resilience. Brexit and the experience of the pandemic are fuelling increasing moves towards nearshoring/on shoring of manufacturing and distribution hubs within the UK and this is expected to ramp up in 2023’. • ‘Despite the unravelling of financial market conditions last year, speculative development soared to a new high of 23.6 million sq.ft at the end of 2022’. • ‘Ongoing positive fundamentals in the occupier market should restore I&L as the UK’s lead performing sector over the medium term’. <p>CBRE UK Real Estate Market Outlook (2023)</p> <ul style="list-style-type: none"> • ‘The UK logistics market will experience continued occupational demand above long-term averages, with third-party logistics distributors leading take-up, as organisations seek more flexibility in their supply chains. Vacancy rates will remain critically low, as build-to-suit development grows. Industrial and logistics assets will remain attractive to investors with continued rental growth expected’. • ‘Demand from occupiers will continue through 2023, with take-up volumes remaining above the 10-year average. Big-box logistics space under offer at the end of Q3 totalled 16.8 million sq.ft (up 27% year on year), indicating that appetite from occupiers for warehouse and manufacturing space is still strong, despite caution over the impact of the costs of living on consumers, and slowdown in retail spend’. • ‘Vacancy rate is set to remain at a critically low level, with lack of available units hindering take-up levels. Rental growth will continue, driven by the demand and supply imbalance’. • ‘The logistics sector will reinforce its position as a major contributor to total real estate investment and will remain an attractive asset class’. <p>Colliers Industrial and Logistics Market Pulse 2023 UK</p> <ul style="list-style-type: none"> • ‘Forecasting an average rental growth of 3.7% for 2023, with the industrial sector outperforming any other commercial real estate sectors to 2027 (4.2%)’. • ‘Online spending is to remain elevated compared to pre-pandemic levels, which will prompt some occupiers to improve their supply chains’.

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			<p>7 Summary & Recommendations</p> <p>The I&L sector is booming nationally. Even before the Covid-19 Pandemic the I&L market had been growing strongly with demand outstripping supply. The Covid-19 Pandemic has merely accelerated a number of growth drivers that were already in place such as online shopping and the desire for quick deliveries. Brexit too is increasing I&L demand as companies consider bringing part of their operations back to the UK to guard against future supply chain shocks, as well as increasing their inventory levels.</p> <p>Crawley, the Lichfields FEMA, and the Savills FEMA have all been supply constrained historically, with availability having been below the 8% equilibrium rate for much of the last decade. Another confirming factor of demand outstripping supply is the high rental growth, which has been three times the rate of inflation across all three geographies.</p> <p>In terms of unit size, the Lichfields FEMA, the Savills FEMA and Crawley have a lack of supply of larger units relative to the England average. Units between 250,000 and 500,000 sq.ft represent 12% of total inventory across England, but just 4% in the Lichfields FEMA and Savills FEMA, and 7% in Crawley. The situation is even more stark for units above 500,000 sq.ft where the Lichfields FEMA, Savills FEMA and Crawley have no supply versus 11% across England. This lack of large units supply is constraining growth in Crawley, Lichfields FEMA and Savills FEMA given these larger size bands have accounted for 41% of all leasing demand (i.e. net absorption) in England over the last 5 years.</p> <p>The lack of larger unit supply in the Lichfields FEMA, the Savills FEMA and Crawley, coupled with the strong occupier demand for these size bands, has led there being critically low availability. Gatwick Green offers a large strategic site in a prime location that can facilitate the delivery of new high specification units above 250,000 sq.ft.</p> <p>Against this context of exceptional growth in the sector, it is our experience that local authorities routinely underestimate demand for I&L uses. We have reviewed Crawley Borough Council's employment evidence used to inform the Draft Local Plan. The selected labour demand method fails to account for current day market drivers which has led to an underestimation of 'true' market demand for I&L uses within Crawley.</p> <p>The Savills' approach to estimating future demand is aimed at building on the Council's employment evidence by quantifying the impact historic supply constraints have had on 'suppressing' demand. Our methodology is NPPG-compliant as it builds upon historic demand (net absorption), adjusting past trends for historic supply shortages and the subsequent loss in demand. We refer to this as 'suppressed demand', which is added to the historic demand trend as a top-up. For the Savills FEMA demand estimates, we also factor in demand that is being lost from London due to former I&L sites being redeveloped for housing. The Savills FEMA by way of its adjacency to South London is a prime candidate to pick up I&L demand that has been displaced from London.</p>

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Savills' full methodology usually considers the effect of e-commerce on future demand for I&L land. However, to be conservative, the two demand scenarios do not include additional demand from the predicted increase in e-commerce into the future which would likely increase future demand further.

Based on Savills' demand methodology, over an 18 year period which is consistent with the EGA (2023), the first run of the model using the Lichfields FEMA estimates I&L demand within Crawley to be 69 ha of land. The second run of the model uses the Savills FEMA and includes the effects of demand being lost from London, which estimates I&L demand within Crawley to be 118 ha of land. To be conservative, displaced demand that is being lost from London is not included in the Lichfields FEMA demand estimates given its geographic proximity, and the absence of any local policy to address the unmet needs of London.

Savills' estimate of I&L demand is significantly higher than the EGA (2023) estimate of 22.9 ha for industrial uses over the 18 year period. Savills' much higher demand estimate clearly evidences that a strategic site such as Gatwick Green is needed, and will attract substantial market interest.

Appendix 3: Evaluation of Scope of Economic Evidence

Scope of economic evidence under PPG: Lichfields and Savills

Planning Practice Guidance	Lichfields (2020)	Savills (2023)
Best fit FEMA - Hershham, Crawley, Mid Sussex	✓	✓
Review of existing stock	✓ *	✓ **
Patterns of employment land/floorspace supply and loss	✓ *	✗
Market demand: <ul style="list-style-type: none"> • Locational requirements • Premises requirements • Market intelligence • Surveys of business needs • Discuss with agents/developers • Engage with business forums • Demand and supply mismatch – quantitative and qualitative • Market segments over/under supplies 	✓ **	✓ **
Wider market signals / intelligence: <ul style="list-style-type: none"> • Economic growth • Diversification • Innovation • Market failure • Business trends • Innovation • Understanding business models (e.g. on-line platforms) • Business, economic and employment stats • Long term economic cycles • Alternative economic scenarios 	✓ **	✓ **
Forecasts using market signals: <ul style="list-style-type: none"> • Labour demand • Labour supply • Past take-up rate 	✓	✗
And/or forecast based on future property market requirements	✗	✓ **
Assessing the need for logistics: <ul style="list-style-type: none"> • Engage with logistics occupiers and developers • Analyse market signals • Analyse economic forecasts: changes in demand / growth • Engage with LEPs and take account of LISs • Most appropriate locations to meet needs for logistics • Consider needs of SMEs / Last mile uses 	✗	✓ **

Key	
✓	Fully covered
✓	Partly covered
✗	Not covered
*	Undertaken in 2020
**	Undertaken in 2023
**	Topic Paper 5 2023

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			<p>Appendix 4: Strategic Industrial and Logistics – Location and Complementary</p> <p>1 Introduction</p> <p>1.1 Purpose</p> <p>This report has been prepared on behalf of the Gatwick Green Limited (GGL) and is provided to support GGL’s representations to the Draft Crawley Borough Local Plan 2024-2040, May 2023, (DCBLP). Its aim is to identify the factors that influence the location of strategic logistics and to provide evidence that there is a high degree of complementarity between Gatwick Green, the Manor Royal Business District (Manor Royal), the Horley Business Park and the other Main Employment Areas (MEAs) in Crawley Borough.</p> <p>1.2 Report Structure</p> <p>The report is structured as follows:</p> <ul style="list-style-type: none"> • Section 2 discusses the guidance on the locational considerations for strategic Industrial & Logistics (I&L) uses in national and local policy and regional strategies. • Section 3 presents what the I&L market considers to be the key locational considerations to provide quality logistics and supply-chain linkages. • Section 4 evidences the role of airports in attracting strategic I&L development, with reference to several benchmark airports. • Section 5 provides evidence to support the complementarity between Gatwick Green, Manor Royal, the Horley Business Park and the other MEAs. • Section 6 provides conclusions. <p>1.3 Report’s Key Findings</p> <p>The report’s key findings include:</p> <ul style="list-style-type: none"> • National, regional and local policies guidance and strategies all variously identify the key factors that drive the location of strategic I&L uses, such as: accessibility to the motorway network, customers and suppliers, a large labour pool, freight handling infrastructure (such as Gatwick Airport) and London. • When policy and guidance is applied to the regional/local context, it points directly to the Crawley/Gatwick area as the prime location for such uses to leverage various economic benefits. • UK airports are a major locational driver for strategic I&L development – by comparison with several benchmark airports, it is clear that the strategic I&L uses are very under-represented in the hinterland of Gatwick Airport, and especially with regard to very large units (above 250,000 sq.ft). • A range of property-based evidence clearly shows that Gatwick Green would complement Manor Royal, the other MEAs in Crawley and the Horley Business Park by offering different and mutually supportive opportunities for large and very large I&L units that cannot be accommodated at Manor Royal without harming its mixed business function.

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			<p>• The agglomeration benefits of Gatwick Green further strengthen the complementarity between the Site and the other MEAs by providing business growth opportunities for existing general business employment areas.</p> <p>1.4 Reader Note When we refer to the Industrial and Logistics (I&L) sector we mean Light Industrial (formerly B1c use class now part of Class E), General Industry (B2 use class) and Storage and Distribution (B8 use class). Effectively the primary use classes that require warehouses and factories (including ancillary offices) and associated yard spaces. These use classes typically cover the diverse range of industrial, manufacturing and logistics companies that operate within England.</p> <p>2 Policy considerations</p> <p>2.1 Introduction An understanding of the advice and guidance contained in national and local policies and other regional studies provides an important overview of what the UK Government, regional authorities and Crawley Borough Council consider are the priorities for the location of strategic I&L from a public interest perspective. This, in turn, provides a useful context for the assessment of the market locational drivers for strategic logistics and the extent to which these indicate the optimum location for such economic infrastructure within the Coast to Capital LEP and Gatwick Diamond areas.</p> <p>This section therefore outlines key policy / guidance on the location of strategic I&L contained in the following documents:</p> <ul style="list-style-type: none"> • The National Planning Policy Framework 2021 & Planning Practice Guidance • The TfSE Freight Logistics and Gateways Strategy (2022) • The Local Industrial Strategy, 2021 and the Strategic Economic Plan (2018) (Coast to Capital LEP) • The adopted Crawley Borough Local Plan 2015-2030 (CBLP, December 2025) • The Draft Crawley Borough Local Plan 2024-2040 (DCBLP, May 2023) <p>2.2 National Planning Policy Framework, 2021 (NPPF) & Planning Practice Guidance (PPG) The NPPF contains high level guidance on what LPAs should do to address the needs of the different sectors, including for storage and distribution operations. This states that LPAs should, <i>inter alia</i>, recognise and address the specific locational requirements of storage and distribution operations at a variety of scales and in suitably accessible locations.</p> <p>PPG provides further guidance (Paragraph: 031 Reference ID: 2a-031-20190722) on what these locational requirements are. It states as follows (Savills emphasis): <i>“The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational</i></p>

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			<p><i>requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).</i></p> <p><i>Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour. Where a need for such facilities may exist, strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas.</i></p> <p>National planning policy and guidance therefore recognises the critical role of the logistics sector to the UK economy – this represents important economic infrastructure, which has the potential to improve the UK’s productivity in line with the objectives in the UK Government’s policy paper on growth¹.</p> <p>The locational requirements of the sector are set out clearly in PPG, including the need for significant areas of land, access to strategic transport networks, sufficient power capacity and access to skilled labour; the last point recognises that modern strategic logistics requires a highly skilled and professional workforce.</p> <p>2.3 Regional guidance</p> <p>Transport for the South East (TfSE) has published an important strategy on freight logistics and gateways, supported by a significant evidence base prepared by WSP consultants: the Freight, Logistics and Gateways Strategy (FLGS, 2022). This is a comprehensive report details TfSE’s commitment to reducing carbon, improving efficiency in Freight Transport and improving understanding of the needs of the logistics sector. The FLGS highlights the importance of logistics and freight and how it can be accommodated in more sustainable ways; in relation to the location of logistics development in the South East, Work Package 5 (Operational & Planning Considerations, para 2.3.34) states that:</p> <p><i>“The burgeoning freight and logistics sector is an emerging economic driver driven by both the proximity of strategic road and rail networks, international gateways and clustering of suppliers, wholesales and third party logistics providers, offering competitive advantages through supply chain efficiencies. Alongside high-profile companies such as Amazon who had established distribution hubs pre pandemic across counties such as Kent amidst the boost in e-commerce, there is a requirement by public authorities to unlock land in conducive locations and provide the necessary infrastructure. The TfSE area is blessed with several international gateways which should be exploited.”</i></p> <p>The advice to LPAs is therefore to harness the locational advantages of their areas to accommodate this critically important economic infrastructure. In the case of Crawley, this means land accessible to the Strategic Road Network (M23 motorway), international gateways (Gatwick Airport), the London to Brighton mainline rail</p>

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			<p>(Gatwick Airport and Three Bridges stations), and other major employment areas that could offer agglomeration benefits (e.g. Manor Royal).</p> <p>Further regional guidance is contained in a number of strategies produced by the Coast to Capital LEP, which contain a number of findings on the locational aspects of major industrial and logistics development. The Local Industrial Strategy (LIS) is specifically referenced in PPG as a consideration in determining the scale and location of strategic I&L development. Various extracts are noted below (with Savills emphasis).</p> <p>Local Industrial Strategy (LIS) and the evidence based documents (Coast to Capital LEP, 2020)² (Savills emphasis)</p> <p><i>“Gatwick airport <u>and the land around it</u> will be a major driver of our region over the coming decades. We would like to partner with Government to undertake a major study into the infrastructure required to support this growth and ensure that it is sustainable.”³</i></p> <p><i>The biggest challenge facing the Gatwick Diamond is <u>the lack of land for development, restricting the ability of large occupiers to find appropriate space</u> (CPS, para 7.50).</i></p> <p><i>Demand is strong for industrial space, especially for ‘last mile delivery’ warehousing – evidence suggests that <u>Crawley and Gatwick with their excellent transport links are well placed to meet this demand, which is outweighing supply</u> (CPS, para 7.54).</i></p> <p><i>Of the land safeguarded for the second runway at Gatwick, sites comprising c <u>150 ha represent an excellent opportunity for employment development with potential for public transport connections – this could meet demand for commercial space</u> (CPS, para 7.51).</i></p> <p><i>Gatwick Airport represents a significant driver for development going forward – <u>land east of the Airport would be well-positioned to capture a significant proportion of this demand given its location close to the Airport</u> (CPS, para 7.55).</i></p> <p>Coast to Capital Strategic Economic Plan 2018-2030 (Gatwick 360o, 2018)</p> <ul style="list-style-type: none"> • Identifies <u>Gatwick Airport as the driver of, and location for, economic growth</u>. • The Airport is described as “...<i>central to our plans to unlock future productivity and prosperity for our area as a whole.</i>” • Delivering priorities at Crawley/Gatwick will therefore require land for growth and development linked to private-public investment in infrastructure. • Business parks at Horsham, Burgess Hill and Horley will not be sufficient to meet future needs. <p>Build Back Stronger, Smarter and Greener (Coast to Capital LEP, 2020): This study contains a section dedicated to the importance of Crawley/Gatwick as a key location for growth (Build back stronger. Crawley and Gatwick: A centre for global growth); it concludes:</p>

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			<p><i>“We need to learn to see Gatwick airport for what it is: a large scale integrated transport hub which has the same potential as any of the new HS2 destinations for economic transformation. This will require an appropriate growth vehicle to create the vision and attract public and private investment to deliver the infrastructure that the region needs to support development. To do this, <u>we must promote the untapped potential of Crawley and the towns around it, to leverage the airport and make a full contribution to the future economy of Global Britain.</u>”</i></p> <p>“One Town” Crawley’s Economic Recovery Plan 2022-2037 (Crawley Borough Council, 2021) This plan provides a vision for Crawley’s future socio-economic prosperity, including a strategy for existing delivery programmes. The critical elements of the recovery plan are:</p> <ol style="list-style-type: none"> 1. A ‘one town’ vision centred on green growth economy delivered through, <i>inter alia</i>, <u>a new site to help boost jobs for residents.</u> 2. Tackle <u>long term</u> structural economic challenges by attracting business investment, <u>addressing the limited supply of employment land</u>, unlocking green infrastructure, strengthening the local workforce and transforming sustainable transport and digital capacity. 3. Delivering a diverse and resilient economy – though flagship interventions, including unlocking sufficient suitable employment land to drive recovery. 4. A Green Transformation based on a comprehensive approach to securing a greener economy, including green transport. 5. Skills for the Future – though new and upgraded skills and training facilities. 6. A connected Crawley through a range of sustainable transport infrastructure. <p>2.4 Crawley Borough Local Plan 2015 – 2030 (adopted 2015) The adopted Crawley Borough Local Plan identified a shortfall in employment land of 35 ha and the need for this to be addressed in the future. In terms of the location of that economic growth, the Plan states that: <i>“...a thorough assessment of employment site options will be undertaken once a final decision has been made by the government on UK airport expansion and safeguarding. It is recognised that the significant demand for business land should in the first instance be directed to Crawley, building upon its key role as the economic focus at the Heart of the Gatwick Diamond and excellent connectivity with Gatwick Airport.”</i> This emphasis was enshrined in Policy EC1, which identified an Area of Search for strategic employment (Savills emphasis): <i>“The preferred location for strategic employment is within the borough, to the north of Manor Royal and south or east of Gatwick Airport, identified as the Area of Search on the Key Diagram. However, given current safeguarding of this land for a possible second runway at Gatwick, work required to identify an appropriate site, or sites, for further business development will take place after the government has issued a final decision on additional runway capacity in the UK, and has determined whether the area should still remain safeguarded.”</i></p>

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			<p>The Council's long-standing strategy recognises the major locational attributes of the Crawley/Gatwick area, which are enshrined in policy, i.e. its connectivity to the Airport and its location at the heart of the Gatwick Diamond⁴. This focus on accommodating strategic employment at Crawley has been continued into the Draft Crawley Borough Local Plan 2024-2040 (DCBLP, May 2023): this recognises the locational advantages of the land east of Gatwick by allocating it for a 44ha Strategic Employment Location (SEL), whilst also retaining the long-term possibility of a southern wide-spaced runway at Gatwick Airport. There are two points to note, (1) that the decision on runway capacity in the South East has been taken with the expansion of London Heathrow Airport, so now is the right time to be addressing these long-standing unmet employment land needs, and (2) that the land south of Gatwick Airport is safeguarded for airside operational uses associated with the possible wide-spaced second runway, so Crawley BC has rightly concluded that land to the east of the Airport previously safeguarded for landside surface level car parking uses should be the focus of meeting the outstanding needs.</p> <p>Overall, the national, regional and local policy guidance and strategies all variously identify the key factors that drive the location of strategic I&L uses, and when applied to the regional/local context, point directly to the Crawley/Gatwick area as the prime location for such uses to leverage various economic benefits.</p> <p>The following section goes on to outline the why the market sees Crawley as a prime I&L location and why the proposed Gatwick Green allocation represents a strategically important site.</p> <p>3 Crawley is a Prime I&L Location</p> <p>3.1 Introduction</p> <p>Within this section, we consider how Gatwick Green's (the Site) location and scale afford it a number of strategic advantages which make it a regionally significant I&L opportunity. It considers the Site's locational context including proximity to strategic HGV and LGV routes, major freight handling infrastructure, and access to end customers, businesses and labour supply. Effectively, it is a prime I&L site of regional significance that can meet local needs and service the M23 corridor and the wider south coast sub-markets.</p> <p>Crawley, like all local areas, is part of a wider sub-regional market, and therefore is subject to supply and demand forces which need to be assessed beyond its local authority boundaries. This is true for many commercial sectors, but it is particularly important for I&L occupiers which typically have distribution networks linking their customers and suppliers of between 1 to 4 hours' travel time, sometimes longer, depending on their size. The strategic nature of I&L means that it can service the needs of a regional and national market, whilst providing employment and skills training both locally, and also off-site across the wider supply chain.</p> <p>3.2 Crawley is a prime I&L location</p> <p>Gatwick Green's location benefits from a number of strategic advantages which make it ideal for I&L development as detailed below. This largely reflects the locational factors identified in PPG and regional strategies.</p>

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• **M23 is a nationally significant motorway** - As shown in **Figure 3.1**, the M23 is a nationally significant movement corridor that facilitates over 10,000 HGV and LGV movements per day. Being directly adjacent to a junction on such an important motorway is extremely beneficial for I&L occupiers. According to Savills European Logistics Census⁵, location is the most important factor impacting business investment decisions in the I&L sector (89% of respondents).

Figure 3.1 Busiest LGV and HGV Movements



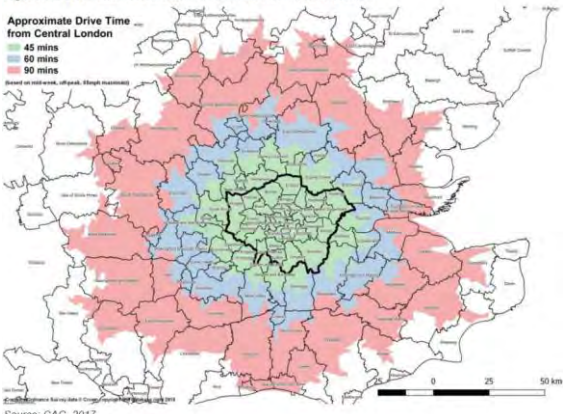
Source: Savills, DfT, 2023

• **High accessibility to suppliers and end customers** - Most I&L occupiers have supply chains linking themselves with their suppliers and end customers of between 1 to 4 hours travel time. If we take a middle ground of 2 hours, which is appropriate for most companies, over 24 million people (40% of England and Wales’s population) and over 1 million businesses (45% of England and Wales’s businesses) can be accessed from Gatwick Green⁶. Such impressive numbers are because of large conurbations including London, Southampton, Portsmouth and others which are all accessible from the Site within 2 hours.

• **High accessibility to a large labour pool** - We consider a 32-minute drive time catchment to be appropriate for accessing labour from the Site. This is the average home-to-work travel time for Crawley BC⁷. Within this catchment, approximately 580,000 working-age people (aged 16-64) are reachable, representing a high level of workforce accessibility and a considerable labour pool for future businesses located at Gatwick Green.

• **Ability to link with major freight handling infrastructure** – I&L developments not directly linked to or within the estate of key freight handling infrastructure, but located nearby, can benefit from its use as part of their wider supply chains. We consider a 2 hour drive time catchment as suitable in capturing the majority of I&L businesses

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			<p>that may use freight handling infrastructure as part of their supply chains. There are 19 rail freight interchanges within the 2 hour drive time catchment of the Site, 13 ports including Dover, Southampton and Portsmouth, and 9 airports including Luton, Heathrow and Gatwick. Gatwick airport specifically, which the Site lies directly adjacent to, is the 2nd busiest passenger airport in the UK (pre-pandemic - over 46 million passengers per annum⁸).</p> <p>• Proximity to London – Gatwick Green lies approximately 10 miles and 25 miles from junction 7 of the M25 and Central London, respectively. As a result, it provides ready access to London and subsequently affords future occupiers the ability to service the London market which suffers from a serve lack of I&L supply. The 2017 London Industrial Land Demand Study⁹ provided an indication of the potential to service the London economy from outside by illustrating drive-time catchments to Central London. As illustrated by the map in Figure 3.2, Crawley BC is fully contained within the 60-minute drive time catchment from Central London, which makes it ideally located to attract demand from I&L occupiers which service the London economy. This is likely to become a growing phenomenon given former I&L sites are being redeveloped in London for housing to help address the housing crisis. According to the London Industrial Land Demand Study, between 2006 and 2015, London’s loss of industrial employment land averaged 96 ha per annum, increasing to 106 ha per annum for the more recent 2010 to 2015 period.</p> <p>Figure 3.2 Drive Time Catchment Areas to Service Central London</p>  <p>Approximate Drive Time from Central London</p> <ul style="list-style-type: none"> 45 mins 60 mins 90 mins <p>Based on rail network, off-peak, 80mph maximum</p> <p>Source: CAG, 2017</p> <p>Overall, there are six reasons why Gatwick Green is considered to be a prime I&L location. These are closely aligned with the locational considerations identified in national planning guidance (PPG) and regional strategies, and in turn are reflected in the identification of the Area of Search for employment development east and south of Gatwick, and the proposed allocation of Gatwick Green.</p>

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			<p>4 The role of Airports as a focus for logistics</p> <p>4.1 Gatwick Airport</p> <p>Airports have always been important economic generators for the local and regional economies within which they are located. However, in more recent times they have transformed from a facility with the sole purpose of transportation to one which offers an array of services and amenities, including shops, restaurants, hotels and entertainment. This recognises that airports can perform beyond their traditional aeronautical services to obtain high amounts of revenue (40-60%) through non-aeronautical revenue, as well as catalysing numerous real estate opportunities in the areas surrounding them, such as hotels, offices, medical facilities and more. In response, the 'Airport City' concept has emerged in many airports across the world and its applicability to Gatwick Airport is evident.</p> <p>Within this report, a number of key European Airports were reviewed to help understand how commercial development is responding to airport growth. These case studies help to demonstrate that the 'Airport City' concept is real and is being aggressively pursued in Europe and throughout the world, whether it be a 20 million or 70 million passenger airport. A clear correlation has been established between growth in passenger numbers and freight volumes and the ability of airports to attract new commercial development, both in terms of larger companies as well as certain business sectors that are attracted to the agglomeration benefits of an airport location. Land surrounding airports has always been suitable for I&L development and the unique location of Gatwick Airport in proximity to major roads and urban centres means it is a natural location for the storage and management of goods.</p> <p>Accordingly, adjacency to Gatwick Airport is considered to be crucial to maximising the economic and investment opportunity for commercial uses in particular. Focusing development activity where it will be in most demand and achieve the highest values should enable new commercial uses at Gatwick Green to best contribute to wider infrastructure needs of the region, sub-region and Borough.</p> <p>The majority of future infrastructure requirements will benefit both the Airport and Gatwick Green and therefore offer investment and utilisation efficiencies that will also advance the transport sustainability objectives of the Council. Finally, there is a lack of alternative development sites in the wider region of this scale with such strong motorway and rail accessibility, not to mention adjacency to a large and growing international airport. Existing employment clusters within a 10 km radius of Gatwick Airport are relatively small in size at between 5 to 15 ha versus 44 ha for Gatwick Green. Manor Royal is the exception at 240 ha, but it is restricted from growing its footprint under adopted Local Plan policy on safeguarding. The existing employment areas within a 10 km radius of the Airport have limited land and floorspace availability to accommodate the strong future I&L floorspace demand identified in Savills report on Crawley's employment land needs¹⁰. Gatwick Green represents a prime opportunity to accommodate this future demand alongside a growing Gatwick Airport.</p>

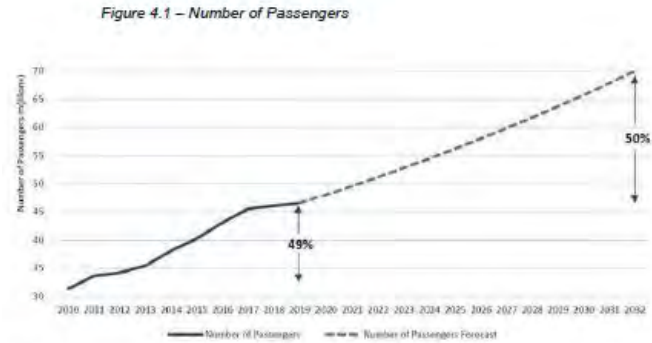
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The importance of Gatwick Airport is acknowledged by the Coast to Capital (CTC) LEP, which identifies it as the single biggest driver of economic growth in the area. Its influence is especially important to the M23 corridor. CTC encourages the collaboration of planning and strategic authorities around Gatwick to maximise the economic potential of the area around the airport. The excellent public transport and road connectivity of the airport, and the lack of planning constraints on land to its east (with the removal Safeguarding from the Gatwick Green allocation in the DCBLP, 2023), make it an ideal anchor for further development of I&L space, which is in acute demand in the area. By developing the economic infrastructure around the airport, the airport and its zone of influence can benefit not only Crawley, but the wider sub-region and region.

Gatwick Airport & Crawley Area

Figure 4.1 below shows that the historic number of passengers flying from and to Gatwick airport (data from February 2019). The number of passengers has grown by 49% over the nine years prior to 2019. This is equal to a compound annual growth rate of 4.5%

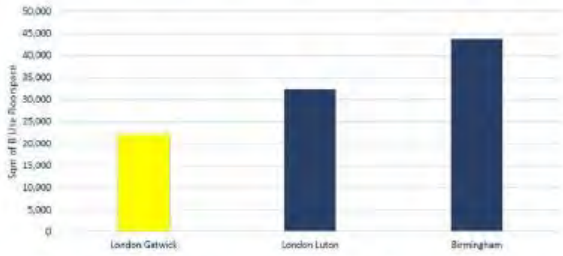


Source: Department for Transport Statistics Table TSGB0202b (AV10102b). Gatwick Airport Master Plan 2019

Gatwick Airport consulted on its Northern Runway plans in 2021 and 2022. This proposes the use of the northern emergency runway for operation use, enabling the airport to grow its passenger numbers ahead of its proposed long-term plans for a southern wide-spaced runway; the Gatwick Airport Master Plan (GAMP) was published in 2019 and whilst retaining the long term safeguarding for the wide-spaced runway, it stated that it is no longer actively pursuing plans for an additional runway. The Northern Runway plans contain a forecast of 75 million passengers by 2038 based on bringing the standby (emergency) runway into regular use for departing aircraft. This is a 127% growth over 16 years. Alongside significant forecast growth in passenger numbers, the volume of cargo handled by Gatwick is forecast to increase from 150,000 tonnes in 2019/20 to around 350,000 tonnes per year by 2047 if Northern Runway proposals are realised¹¹, an increase of 223%.

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			<p>4.2 UK Airports and Commercial Floorspace</p> <p>Land surrounding airports is generally well-connected with regard to major roads and population centres. The economic role of airports and the land surrounding them has therefore rightly been recognised in Government policy through the designation of Enterprise Zones (EZ) and Freeports (FP), e.g. Solent centred on Southampton Airport (FP), and East Midlands (FP). For example, in the Solent Freeport, the proposed Navigator Quarter comprises parcels of land adjacent to the North and East of the Airport comprising c 46 ha of light industrial, warehouse and science park development.</p> <p>These designations have and are attracted significant strategic I&L uses, attracted by co-location with international airport hubs and the Strategic Road Network (SRN). The key airports where these designations apply are:</p> <p>Enterprise Zones:</p> <ul style="list-style-type: none"> • Blackpool Airport • Luton Airport • Manchester Airport City • Cardiff Airport <p>Freeports:</p> <ul style="list-style-type: none"> • East Midlands Airport • Teesside International Airport • Liverpool Airport • Southampton Airport <p>A good example is the Manchester Enterprise Zone (MEZ), which contains the nearby Global Logistics, just southwest of the airport, and offers flexible plots for logistics development from 20,000 sq.ft to 600,000 sq.ft, with capacity for over 2m sq.ft of logistics.</p> <p>Local Authorities are also recognising the important contribution airports and nearby I&L development can play, with consents recently granted next to Stansted Airport for a new industrial estate of c 40 ha with capacity for c 2m sq.ft of logistics. Hounslow Council has also proposing a major new I&L allocation on Hatton Fields next to Heathrow, and the development of CGX Connect at Gloucestershire Airport.</p> <p>Figure 4.2 below shows the existing provision of B use floorspace per million of passengers within a 2 mile radius from key UK airports (based on data from February 2020). This shows Luton and Birmingham having a higher provision per million passengers than Gatwick Airport, illustrating the under-provision of B use floorspace in Gatwick's zone of influence. This is 32% less than London Luton and 49% lower than Birmingham, despite these being much smaller airports.</p>

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			<p data-bbox="763 300 1256 320"><i>Figure 4.2 – Existing B Use Floorspace Provision per Million Passengers</i></p>  <table border="1" data-bbox="712 352 1272 608"> <caption>Data for Figure 4.2</caption> <thead> <tr> <th>Airport</th> <th>Existing B Use Floorspace Provision per Million Passengers</th> </tr> </thead> <tbody> <tr> <td>London Gatwick</td> <td>~22,000</td> </tr> <tr> <td>London Luton</td> <td>~32,000</td> </tr> <tr> <td>Birmingham</td> <td>~43,000</td> </tr> </tbody> </table> <p data-bbox="701 619 1149 635">Source: CoStar 2020, Department for Transport Statistics Table TSGB0202b (AV10102b)</p> <p data-bbox="701 660 2024 932">Outline planning permission was granted some years ago to deliver Century Park, a 28 ha (70 acre) commercial development east of London Luton airport. The park is part of the London Luton Airport Enterprise Zone, supported by South East Midlands LEP. The enterprise zone is anticipated to deliver up to 7,200 new jobs and attract inward investments to support economic growth across the sub-region. More recently, the Airport has had a Development Consent Order (DCO) application accepted by the Planning Inspectorate to permit the airport to expand from c 18 mppa to about 32mppa, alongside the provision of a similar scale of adjacent commercial development to that envisaged by the Century Park proposal, but reconfigured to enable a viable arrangement. Plans for the Airport Business Park are also under development, proposing further office space and light industrial units.</p> <p data-bbox="701 954 2024 1166">Birmingham Airport has high access to employment floorspace with Birmingham Business Park (60ha), Elmdon Trading Estate (17 ha) and Jaguar Land Rover Solihull (105 ha) being within a two-mile radius from Birmingham Airport. The draft local plan for Solihull identifies the airport’s area as unique with the potential to deliver major growth on a nationally significant scale both to meet the economic growth aims of the Borough as well as the wider growth aspirations of the Greater Birmingham and Solihull LEP and the West Midlands Combined Authority. The same plan identifies land for employment at Damson Parkway to allow for the future expansion of Jaguar Land Rover.</p> <p data-bbox="701 1187 2024 1337">It is evident from these two examples how airports are being viewed by their respective local planning authorities and LEPs as major economic drivers for attracting further economic activity. Therefore, its vitally important Crawley Borough Council and CTC LEP has taken the opportunity to identify the potential of the zone of opportunity at Gatwick and allocate prime employment land at Gatwick Green now that the DCBLP review has removed some of the safeguarding from the land east of the airport.</p>	Airport	Existing B Use Floorspace Provision per Million Passengers	London Gatwick	~22,000	London Luton	~32,000	Birmingham	~43,000
Airport	Existing B Use Floorspace Provision per Million Passengers										
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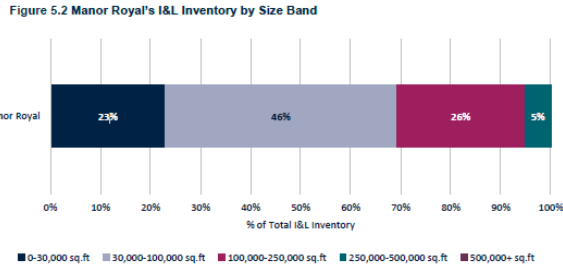
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			<p>If the Council does not seize the opportunity to harness the economic potential of a growing Gatwick Airport, the economic downsides will be felt both in Crawley Borough and more widely in the region.</p> <p>This picture is reinforced when Gatwick is compared with Birmingham, Manchester and East Midlands in terms of larger I&L units over 100,000 sq.ft. Crawley currently has a significant undersupply of larger I&L units above 100,000 sq.ft in size when compared to the national average and other key I&L markets. Nationally 44% of all I&L floorspace is within large units above 100,000sq.ft. In Crawley, the proportion is much lower at only 28% or 2,380,233 sq.ft of floorspace.</p> <p>Other UK airports also have much higher quanta of I&L floorspace within larger units within a 3km radius (based on data from 2021), including:</p> <ul style="list-style-type: none"> • Birmingham Airport - 3,687,990 sq.ft in large units above 100,000 sq.ft • Manchester Airport - 2,599,522 sq.ft in large units above 100,000 sq.ft • East Midlands Airport - 11,021,105 sq.ft in large units above 100,000 sq.ft <p>These airports are also much smaller than Gatwick Airport indicating there is a mismatch between the size of Gatwick Airport and the number of larger I&L units found nearby. This supports the conclusion that economic opportunities in the I&L sector haven't been leveraged adequately in response to Gatwick Airport's growth. Gatwick Airport grew in size (passengers) by 39% over the ten year period from 2011 to 2021, yet Crawley's I&L stock grew by only 6% over the same period.</p> <p>However, it's not just growth at Gatwick Airport that makes Crawley such an in-demand market for I&L investment, but also the M23 and convenient links to London and the south coast. The under provision of larger units in Crawley is due to the lack of large employment sites, other than Manor Royal, where capacity for large development is limited. The proposed Gatwick Green allocation will help address this. It is vitally important Crawley increases its stock of larger units. Savills Big Shed Briefing (which assesses I&L premises above 100,000 sq.ft) found that gross takeup nationally was 56% above the long-term average and that the 2022 year-end take up exceeded the pre-Covid high watermark of 37 million sq.ft by 10 million sq.ft¹². The manufacturing and logistics companies which occupy larger units are major employers, many of whom are keen to locate within Crawley, but can't currently find the available space to do so.</p> <p>5 Complementarity with Manor Royal & Horley Business Park</p> <p>5.1 Introduction</p> <p>Given the evidence that points towards the importance of Crawley/Gatwick as a location for strategic I&L uses, it is important that such development would be complementary to the existing employment areas within Crawley. Policy EC4 of the DCBLP requires that this is the case. This section therefore considers how Gatwick Green will complement rather than compete with Manor Royal and thereby with the other Main Employment Areas (MEAs).</p>

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			<p>We analysis inventory levels by use class at Manor Royal, demonstrating that it is a mixed business location. It also presents the size of I&L units at Manor Royal, demonstrating that larger units are underrepresented, and Gatwick Green provides an opportunity to service this segment in the market.</p> <p>5.2 Policy Context Manor Royal has an established role as a strong and competitive mixed business district. Strategic Policy EC1 (Sustainable Economic Growth) of the DCBLP states that the Council’s recognised economic role and function will be maintained and enhanced through building upon and protecting the established role of Manor Royal as the key mixed business location in Crawley.</p> <p>In comparison, the focus of Gatwick Green is towards the delivery of larger I&L units. This distinction is recognised in the DCBLP at paragraph 9.20 (p109) that states that Manor Royal is identified as the focus for mixed business-led development, and Gatwick Green is in contrast allocated for industrial and distribution-led growth. Paragraph 9.27 (p110) states that land at Gatwick Green is allocated for the delivery of a high-quality industrial-led Strategic Employment Location.</p> <p>It is considered that these policy aspirations are reflective of market realities.</p> <p>5.3 Manor Royal is a mixed-use employment area Manor Royal is a mixed commercial location comprising 12% industrial (former B1c now E Class/B2) floorspace, 57% logistics (B8) floorspace, and 31% office (former B1a now Class E) floorspace¹³.</p> <p>Table 5.1 presents Manor Royal’s current split of inventory by Number of Buildings and average size.</p> <p>Table 5.1 Manor Royal’s Inventory by Number of Buildings (%) and average size</p> <table border="1" data-bbox="712 963 1413 1150"> <thead> <tr> <th>Use Class</th> <th>Number of Buildings</th> <th>Average Unit Size (sq.ft N/A)</th> </tr> </thead> <tbody> <tr> <td>Industrial (B1c/B2)</td> <td>27 (12%)</td> <td>39,508</td> </tr> <tr> <td>Logistics (B8)</td> <td>127 (57%)</td> <td>43,370</td> </tr> <tr> <td>Office (B1a)</td> <td>68 (31%)</td> <td>27,994</td> </tr> </tbody> </table> <p><small>Source: CoStar, Savills 2023</small></p> <p>5.4 Manor Royal’s I&L inventory is concentrated in smaller and mid-box units Figure 5.2 presents Manor Royal’s I&L inventory by size band. It shows that the majority of I&L inventory (69%) are small and mid-box units of less than 100,000 sq.ft in size. The remaining inventory is split 26% in units between 100,000 to 250,000 sq.ft, with only 5% in units above 250,000 sq.ft.</p>	Use Class	Number of Buildings	Average Unit Size (sq.ft N/A)	Industrial (B1c/B2)	27 (12%)	39,508	Logistics (B8)	127 (57%)	43,370	Office (B1a)	68 (31%)	27,994
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Source: CoStar, Savills 2023

Gatwick Green proposes to predominantly cater for strong demand from larger logistics and industrial occupiers. Crawley BC and the FEMA have a lack of supply of larger units relative to the England average and a 0% availability rate for units above 250,000 sq.ft. Given I&L units of this size represent only a small proportion of Manor Royal's employment premises, it's clear Gatwick Green will fill a gap in the market for larger units and will complement Manor Royal's commercial offer.

Gatwick Green has been allocated predominately to cater for strong demand from larger logistics and warehouse occupiers (i.e. over 75,000 sq.ft only 14). Crawley has a relative under provision of very large units above 250,000 sq.ft (Figure 5.2) at 7% of total inventory, when compared to the national average of 23%, and other UK airport economies. Gatwick Green, via its location directly adjacent to the M23 and Gatwick Airport, is ideally placed to service this under-represented segment of the market. Given the site is currently undeveloped, Gatwick Green's economic impact via new jobs and investment will be purely additional.

This contrasts markedly with Manor Royal. According to CoStar¹⁵ only 21 of its 193 I&L premises are large units of over 75,000 sq.ft, with only 1 of these being very large above 250,000 sq.ft. For it to cater for large unit demand significantly above its current provision, it would require the amalgamation of smaller sites. This would create a number of implications:


- Firstly, amalgamation is likely to be complex given the multiple ownerships that exist in Manor Royal.
- Secondly, amalgamating smaller sites for redevelopment would likely displace existing I&L occupiers meaning existing jobs will be lost. This is not the case with Gatwick Green where the new jobs and investment are purely additional given the site is undeveloped.
- Thirdly, this could weaken the current diversity of occupiers and unit sizes in Manor Royal, contrary to proposed Local Plan Policy (EC3), which seeks to promote development that supports Manor Royal's mixed site balance, and Manor Royal's function to meet a range of market needs in the Crawley area.

In terms of the final bullet point, the Manor Royal Economic Impact Study (2018)¹⁶ recommends that Manor Royal should mitigate the potential impacts of Brexit by 'maintaining its diverse mix of businesses to avoid being





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			<p>reliant on a few sectors that could significantly decline due to Brexit' (paragraph 4.28). The report's vision for Manor Royal (paragraph 8.9) states: <i>"By 2026 Manor Royal will have evolved into the South East's leading mixed-activity employment hub, providing modern business accommodation, a range of supporting amenities, and achieving environmental excellence to drive the growth of Crawley and the Gatwick Diamond economy."</i></p> <p>As set out in the DCBLP, Manor Royal is proposed to remain a <i>'focus for business-led economic growth, for office, industrial and storage and distribution-led uses supported by other employment uses where these support the core mixed business function'</i> rather than a strategic site solely for large/very large I&L units.</p> <p>5.5 Horley Business Park The other major employment site near to Crawley is the planned Horley Business Park (HBP) located in Reigate & Banstead Borough Council's area just south of Horley. HBP is allocated under Policy HOR9 of the Reigate & Banstead Borough Council Development Management Plan (DMP) for 31ha (up to 200,000sq.m) for an office-led development. Policy HOR9 states that the site is allocated for a strategic business park of predominantly offices, with a complementary range of commercial, retail and leisure facilities to serve and facilitate the main business use of the site. Gatwick Green's proposed I&L offering would not therefore compete with the strategic office provision of Horley Business Park.</p> <p>5.6 Employment Land Trajectory Savills considers strategic employment sites to be those over 20 ha in size. In this regard, Gatwick Green is the only strategic employment allocation included within the DCBLP which can facilitate large scale new investment in Crawley. With reference to Crawley's Employment Land Trajectory (ELT), the next largest sites after Gatwick Green are redevelopment opportunities in Manor Royal, being sites B and E, both of which are about 4 ha in size.</p> <p>Manor Royal has historically been successful at redeveloping and rejuvenating itself to match prevailing market demand at the time. The ELT is further evidence of this, with a number of existing brownfield sites to be subject to either redevelopment, changes of use, and intensification for both I&L and office uses. It is also worth noting that redevelopment and intensification opportunities often deliver only a limited net gain in floorspace, so adding limited additional floorspace to the overall inventory.</p> <p>5.7 Agglomeration Benefits 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.</p> <p>This phenomenon is known as the benefits of agglomeration. The UK Regions: A Framework for Growth report by KPMG (2020), states that business agglomeration is vital to accelerate regional growth, reporting that greater emphasis is needed to maximise agglomeration benefits that accrue from the concentration of businesses and</p>

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			<p>people, such as input sharing, knowledge/technological spill overs, output sharing, and improved productivity. The industrial-led growth at Gatwick Green will therefore further enhance Crawley's recognised role and function as the key economic driver for the Coast to Capital and Gatwick Diamond areas.</p> <p>It should also be noted that smaller companies like being located close to larger companies due to potential agglomeration benefits: Gatwick Green can offer an injection of large / very large logistics units to the benefit of Manor Royal . The benefits of this symbiotic approach would include:</p> <ul style="list-style-type: none"> • Servicing the supply chains of these larger companies. • Increased labour pool of skilled workers. • Knowledge spill over through an increased concentration of economic activity. • Reduction in transport costs¹⁷. <p>The benefits of agglomeration noted above further reinforce the complementarity of Gatwick Green with Manor Royal and the other MEAs in the Borough.</p> <p>6 Conclusions</p> <p>Crawley is a pre-eminent location for strategic I&L uses in the Gatwick Diamond and Coast to Capital economic areas. These locational advantages are recognised in national and local planning policy and regional economic and transport strategies. The locational attributes of Crawley/Gatwick, and in turn Gatwick Green, include proximity to the M23 motorway; accessibility to suppliers and high-end customers; access to a large labour pool; linkages with major freight handling infrastructure (including airports), and proximity to London.</p> <p>The role of airports in attracting and supporting major I&L uses is well evidenced. Gatwick has far lower amount of employment space relative to a number of benchmark UK airports, and a far lower proportion of large I&L units above 100,000 sq.ft. This demonstrates the economic draw of airports for strategic I&L uses provided the land is identified through the planning process, which has historically not been possible at Crawley/Gatwick.</p> <p>Gatwick Green is intended to focus on providing mainly large / very large units (over 100,000 sq.ft), rather than medium sized (or mid-box) units (20,000-100,000 sq.ft) where most of Manor Royal's existing stock and expected planning activity is focused. Gatwick Green will therefore supplement Manor Royal's existing provision of large I&L units, and by doing so put Crawley on the map for larger scale investors and occupiers. Gatwick Green is therefore considered to be highly complementary with Manor Royal, and consequently the other Main Employment Areas in Crawley and in the neighbouring council areas.</p> <p>Crawley needs significantly more large I&L units to bring it in line with the national average and other UK airport markets. Gatwick Green will help address this under provision, including for very large units above 250,000 sq.ft. By doing so, Gatwick Green will also help protect the diversity of offer at Manor Royal and thereby support the objectives of draft Policy EC3.</p>

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			<p>The amalgamation and redevelopment of existing employment sites in Manor Royal has a number of potentially negative implications and is contrary to the intentions of the Council and the Manor Royal BID Company, and Policy EC3. Further, the ELT demonstrates that the opportunities for redevelopment at Manor Royal are limited; involve small sites; includes several redevelopment opportunities offering limited floorspace gain, and so contrasts clearly with the large / very large logistics opportunities offered by Gatwick Green.</p> <p>Gatwick Green would also be highly complementary to the Horsley Business Park, with its focus on office development, which is in stark contrast to the strategic I&L uses envisaged for Gatwick Green. Gatwick Green offers contrasting strategic logistics opportunities that can best deliver significant agglomeration benefits to support the growth of existing Crawley businesses and attract new investment to the Borough. Such benefits cannot be delivered by the limited redevelopment and change-of-use opportunities at Manor Royal. There is already a degree of interdependency between the existing employment areas in Crawley, and the evidence points towards this extending to business linkages between Gatwick Green, Manor Royal and the other MEAs. Such business synergies arise from the effects of agglomeration and will ensure that Gatwick Green will help to strengthen Crawley's overall economic base.</p> <p>Overall, based on all the evidence, Gatwick Green is the prime location for strategic I&L uses in the sub-region, based on its proximity to Gatwick Airport and the M23 motorway. It is also considered to have a high degree of complementarity with Manor Royal, the other MEAs in Crawley and proposed Horley Business Park.</p> <p>Appendix A: Examples of Airports co-location with logistics parks</p> <p>Manchester Global Logistics Park</p> 

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			<p data-bbox="712 288 999 308">East Midlands Gateway Masterplan</p>   <p data-bbox="1406 300 1805 319">Southampton Airport – Navigator Quarter</p>  

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Ref. No.	Respondent	Policy/ Para	Comments
			<p data-bbox="703 277 1014 300">Newcastle International Airport logistics</p>  <p data-bbox="703 555 831 577">Glasgow Airport</p>   <p data-bbox="1397 277 1653 300">Birmingham Business Park</p>   

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Luton Airport DCO

The London Luton Airport Enterprise Zone, current and proposed projects



Exeter Airport



Size: 40 hectares Jobs: 6,500

A major business park equipped to accommodate high quality business and services, including creches, cafes, shops and 150 bed hotel with leisure and conferencing facilities. SkyPark will combine environmentally sustainable office, industrial and distribution space in a landscaped environment next to Exeter Airport and close to Junction 29 of the M5.



Appendix 5: Economic Benefits and Social Value

Gatwick Green
Savills Economic Benefits and Social Value

Savills have been commissioned by the Woking Group to undertake an assessment of the economic benefits and social value of the Gatwick Green development proposed in the administrative area of Crawley Borough Council.

This infographic summarises the key findings.

This document provides the maximum economic benefits and social value generated by the proposed project on the minimum footprint of 73,800 sqm as per Strategic Policy EC8 from Draft Crawley Borough Local Plan 2021 - 2027.

The figure is based on our assumption of the maximum number of employees of 1,290 and 1,470 permanent and temporary jobs respectively. Our assumptions are based on the maximum number of jobs that can be supported on the site.

These figures are based on our assumption of the maximum number of employees of 1,290 and 1,470 permanent and temporary jobs respectively. Our assumptions are based on the maximum number of jobs that can be supported on the site.

WAREHOUSE (B2)
34,600 (20%) sqm

INDUSTRIAL (B2)
23,348 (31%) sqm

The Proposal

Economic Benefits

The scheme would provide on-site and off-site job employment opportunities. These include temporary jobs created during the construction period as well as permanent jobs that will remain once the scheme is completed.

Total job creation on and off-site (jobs for residents of Crawley)

On-site jobs for residents of Crawley	630
On-site jobs for residents of Crawley	630
Off-site jobs for residents of Crawley	1,290
Off-site jobs for residents of Crawley	1,290

TOTAL CONSTRUCTION JOBS
630 JOBS on and off-site jobs that are expected to be generated for Crawley residents over 2 years

ESTIMATED CONSTRUCTION COST
£115 MILLION

GROSS VALUE ADDED
£30 MILLION

TOTAL OPERATIONAL JOBS
1,470 permanent on-site jobs gained

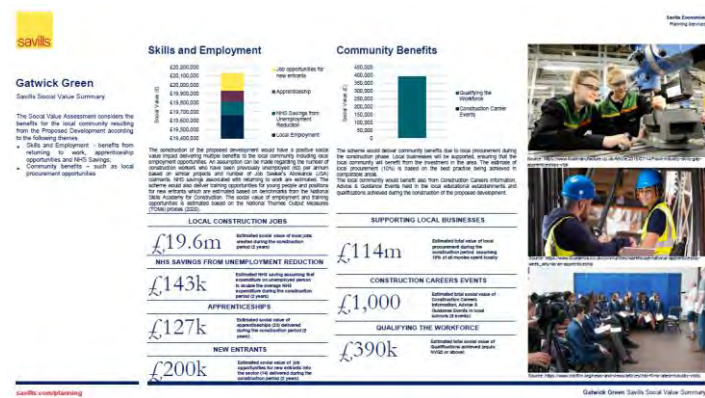
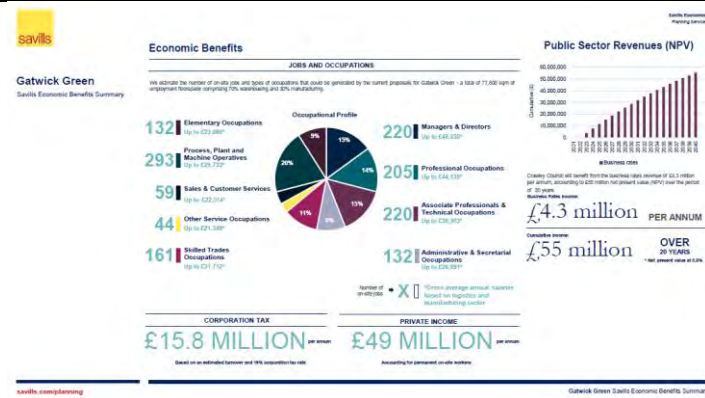
LOCAL SPEND OF WORKERS
£950,000 per annum

GROSS VALUE ADDED
£79 MILLION per annum

Gatwick Green Savills Economic Benefits Summary

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Suggested Modifications:

5.0 Implications for Strategic Policy EC1

5.1 GGL objects to Strategic Policy EC1 on the basis that the overall minimum land need of 26.2 ha and the outstanding need of 13.73 ha does not reflect the assessment of future market demand as PPG requires. The policy has not therefore been 'positively prepared' as the NPPF requires (NPPF, para 35a).

5.2 Whilst the policy provides for a minimum need of 13.73 ha of new I&L land, the evidence shows that a higher level of need can be robustly justified by market evidence, as PPG requires. On the basis that local plans should be 'positively prepared' in order to be sound, it is considered that there is merit in this context

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			<p>and to provide clarity and robustness, for Strategic Policy EC1 to reflect the full amount of overall and outstanding need as noted in this representation (overall need: 69 ha; outstanding need: 59.8 ha). GGL is therefore seeking a change to Strategic Policy EC1 to make the policy sound. Appendix 6 set out the proposed change to Strategic Policy EC1.</p> <p>5.3 The Inspector is asked to consider this matter in light of the evidence presented in this representation.</p> <p>5.4 In the event the Inspector considers that Strategic Policy EC1 should be amended as noted above, or to accommodate some other evidenced higher level of need, there will be a need for consequential changes to the supporting text of the policy (9.13 - 9.27).</p> <p>5.5 As noted at paragraph 4.3 above, it is considered that the change to Strategic Policy EC1 noted above will have no consequences for the outcome of the DCBLP SA/SEA. The options assessed in the SA/SEA in relation to Strategic Policy EC1 were not predicated on any scale of development, so it follows that the outcome remains robust, even if the level of need noted on the evaluation changes.</p> <p>Appendix 6: Proposed changes to strategic policy EC1 and supporting text</p> <p style="text-align: center;">CRAWLEY BLP 2023: PROPOSED AMENDMENTS TO POLICY AND TEXT</p> <p>Proposed changes to the Draft Crawley Borough Local Plan 2024-2040 (May 2023)</p> <p>Savills on behalf of Gatwick Green Ltd</p> <p>Changes to policy / text</p> <p>Proposed changes to the policies and text of the DCBLP are set out below and are indicated by the following means:</p> <p>Additions: underlined Deletions: crossed out</p> <p>Strategic Policy EC1</p> <p><i>"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.</i></p> <p><i>There is need for a minimum 113,390 sqm (29.2 hectares) <u>69 hectares of new business land</u> in the borough which, taking off the opportunities identified in the Employment Land Trajectory, results in an outstanding requirement for a minimum of 1,315 sqm (13.73 hectares) <u>59.8 hectares of new B8 industrial, principally storage and distribution land</u> over the period to 2040....."</i></p> <p>The above change to Strategic Policy EC1 would require consequential changes to the text of the DCBLP:</p> <p>Supporting text Paragraphs 9.13 – 9.15</p> <p>Reasoned Justification Paragraphs 9.21 – 9.24</p>


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REP/131 (2023)	SMB Town Planning on behalf of Oxford Match Ltd	EC1	<p>On 29 June 2021 we made representations on behalf of our clients Oxford Match Limited to the Draft Local Plan 2021 – 2037. In that letter (a copy of which is appended for ease of reference) we stated, inter alia, that our clients have aspirations for the development of their freehold property interests within Crawley town centre. This still remains the case. The relevant town centre policies are EC1, EC2, TC1 to TC5, H2, and H3c.</p> <p>Taken together these policies are generally supportive of the principle of the proposed development comprising the conversion / redevelopment / upward extension of the upper floors of properties within the defined town centre for residential use with the ground floor being retained for Class E uses (Commercial, Business and Service). The provision of additional dwellings on windfall sites is critical to the Council where they are heavily reliant on neighbouring local planning authorities in meeting the identified housing need (58%) over the period of the Local Plan.</p> <p>The draft Local Plan allocates 7 town centre sites under Policy TC3 and Policy H2 to deliver a minimum of 1,500 new dwellings over the Local Plan period. From a review of these 7 sites in the Strategic Housing Land Assessment (February 2023), 3 of them - Cross Keys, MOKA Night Club and Telford Place – may not come forward or the number of dwellings actually delivered on them could well be lower than the Council anticipate. Therefore, this would create a shortfall needing to be met elsewhere, most probably through windfall sites. The draft Local Plan expects 1,598 new dwellings to come from windfall sites (100 dwellings per annum). We note that this “allowance” represents an increase from 55 dwellings per annum from the adopted Local Plan (2015).</p> <p>In meeting this windfall site expectation, we have a number of concerns with some of the policies as drafted in the Local Plan.</p> <p>Suggested Modifications:</p>
REP/144	BYM Capital	EC1	<p>Dear Sir/Madam,</p> <p>Representations by BYM Capital to the Draft Crawley Borough Local Plan 2024 - 2040: Regulation 19 Consultation May 2023</p> <p>BYM Capital ('BYM') welcomes the opportunity to engage with Crawley Borough Council ('CBC') on their draft local plan. This letter sets out our representations to the Regulation 19 stage version 'Draft Crawley Local Plan 2024 - 2040' dated May 2023.</p> <p>BYM are specialists in residential and commercial investment and development. We are the owners of Astral Towers, the Atrium Building and adjacent land located off Betts Way, Langley Green, RH10 9XY (site location plan enclosed at Appendix 1). A planning application was submitted in October 2022 (ref: CR/2022/0653/FUL) for the comprehensive redevelopment of the existing Astral Towers building, adjacent surface car park and Atrium building to provide a series of new industrial, storage and distribution units falling within Use Class B2/B8. The planning application is under consideration by CBC officers.</p>

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			<p>The following representations are arranged in order of appearance in the draft Regulation 19 Local Plan, using the relevant section title or policy reference as appropriate. The representations have been prepared having regard to the various background evidence base documents, consideration of national policy, namely the National Planning Policy Framework (2021), and cognisant of the ‘soundness’ tests for examining Plans.</p> <p>Draft Employment Policies (EC1, EC2 and EC3) We are generally supportive of the approach and purpose of the employment policies within the draft local plan, in particular EC1, EC2 and EC3 which encourage sustainable economic growth by supporting the retention and intensification of the existing main employment areas for employment uses. However, our specific objections to each policy are provided below.</p> <p>Draft Policy EC1 We support CBC’s approach to positively planning for objectively assessed needs for additional employment floorspace/land. We note that CBC reports an office/R&D pipeline surplus, in excess of the objectively assessed requirement. This suggests a need to rebalance employment uses away from office/R&D towards industrial and logistic uses, of which there is an identified need and a shortfall in land.</p> <p>We support Policy EC1 subsections i, ii and iii; however, in subsection iv we object to the inclusion of wording “<i>outside of safeguarding</i>” as it is not justified nor consistent with national policy (see below our objection to draft policy GAT2). The sustainable intensification and extension of existing main employment areas (most notably Manor Royal) will be adversely impacted by the continued safeguarding of land. This wording should be deleted from Policy EC1 subsection iv.</p> <p>Notwithstanding the ‘Gatwick Green’ site being designated as a Strategic Employment site, given its size, development is likely to be brought forward in a phased manner over a long period of time. In the interim, CBC should be actively supporting intensification and extension of existing employment sites within Manor Royal, including on land that has been previously safeguarded. The acceptability of this approach has already been demonstrated through CBC’s resolution to grant planning permission in respect of application ref. CR/2022/0187/FUL at Land to the North of Fleming Way (Eastman House and Former Flight Training Centre), Manor Royal, Crawley.</p> <p>Suggested Modifications: We support Policy EC1 subsections i, ii and iii; however, in subsection iv we object to the inclusion of wording “<i>outside of safeguarding</i>” as it is not justified nor consistent with national policy (see below our objection to draft policy GAT2). The sustainable intensification and extension of existing main employment areas (most notably Manor Royal) will be adversely impacted by the continued safeguarding of land. This wording should be deleted from Policy EC1 subsection iv.</p>

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REP/159	Wealden District Council	EC1	<p>Strategic Employment Matters</p> <p>It is noted that Strategic Policy EC1: Sustainable Economic Growth of the draft Crawley Borough Council Local Plan confirms that there is need for a minimum of 26.2 hectares of new business land in the borough over the Plan period, which will be partly be met by opportunities identified in the Council's Employment Land Trajectory and a new allocation under Strategic Policy EC4: Strategic Employment Location, referred to as Gatwick Green, that will provide a minimum of 13.73 hectares of new industrial land (predominantly Use Class B8). If the new allocation proceeds, CBC will be able meet its identified employment floorspace needs in full. This is fully supported by WDC and will make the best use of existing brownfield sites (with the exception of 'Gatwick Green') within a sustainable town and will ensure that residents within the town have further opportunities to work in close proximity to where they live, reducing the need to travel.</p> <p>Suggested Modifications:</p>
REP/056 (2023)	Gatwick Airport Limited	EC2	<p>EC2: Economic Growth in Main Employment Areas</p> <p>43. We objected to this policy in 2020 Regulation 19 DCLP because Lowfield Heath, which is within land safeguarded for a second runway, was included as one of the main employment areas where major economic related development would be allowed. We maintained this objection in 2021.</p> <p>44. We wish to maintain our objection in 2023. We recognise that Lowfield Heath is an existing employment area and note that the supporting text cross-references the limits of development contained in Policy GAT2. However, in view of the fact that Lowfield Heath is within the safeguarded land, we consider that the policy itself should make it clear that the provisions of Policy GAT2 would take precedence over Policy EC2 in respect of Lowfield Heath and that there is a limitation on the scale of future development likely to be permitted at this location. This approach will ensure that there is no conflict between the policies, that the particular approach to the consideration of development at Lowfield Heath is clearly and unambiguously set down in policy and that it is recognised that a primary consideration in assessing any employment development in Lowfield Heath, would be the need to protect the safeguarded land from development that would add to the costs or complexity of delivering a second runway.</p> <p>45. Further support for such additional control on development in Lowfield Heath derives from the inherent unsustainability of permitting major development only for it to subsequently have to be removed in the event a second runway is brought forward. This would not represent a sustainable approach to development.</p> <p>Suggested Modifications:</p> <p>46. We therefore suggest inserting a new paragraph in the policy before the final paragraph that allows some scope for development and redevelopment in Lowfield Heath to enable modernisation and continued use of existing premises, but not to allow major development:</p>

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			<i>"In Lowfield Heath, employment generating development, including extensions, improvements and redevelopment of existing premises will be permitted provided it would not lead to a significant intensification or increase of development."</i>
REP/057 (2023)	Universities Superannuation Scheme Ltd (Agent: Deloitte LLP)	EC2	<p>Dear Sir / Madam, Crawley Submission Draft Local Plan Regulation 19 (2023) Consultation Representations on behalf of Universities Superannuation Scheme Ltd On behalf of our Client, Universities Superannuation Scheme Ltd (USS), we are writing to respond to the Submission Draft Local Plan 2024 – 2040 consultation which is open for comments until 20 June 2023.</p> <p>Background The asset comprises Denvale Trade Park, Haslett Avenue, Crawley ('the Site'). USS, therefore, has an active interest in the formulation of planning policy at Crawley Borough Council (CBC) and welcomes the opportunity to respond to the Draft Local Plan consultation.</p> <p>The Submission Draft Local Plan sets out planning policies to guide development in the Borough from 2024 to 2040. The document, once adopted, will replace the current Crawley Borough Local Plan 2015 - 2030, which was adopted on 16 December 2015. CBC is inviting comments regarding the soundness and legal compliance of the publication document.</p> <p>It is noted that CBC held their first Draft Local Plan Regulation 19 consultation in 2020. On behalf of USS, Deloitte submitted representations on 5 March 2020. This representation sought to introduce flexibility for the loss of employment floorspace in Main Employment Areas and to support the delivery of mixed-use development in these locations. CBC held a second Draft Local Plan Regulation 19 consultation in 2021. This consultation was held to invite stakeholder comments on planning policy amendments in light of an updated evidence base. At the time of this consultation, it was not considered necessary to re-submit representations on behalf of USS as it was not considered that the updated evidence base had material implications for the content of the submitted representation. Following an update to a significant proportion of the Local Plan evidence base in 2023 (including an updated Housing Trajectory Report, Strategic Housing Land Availability Assessment, Windfall Statement, Economic Growth Assessment and Employment Land Availability Assessment) we consider it necessary to submit updated representations.</p> <p>In the context of the updated evidence base, this representation continues to request the introduction of a greater degree of flexibility within Main Employment Areas (Draft Policy EC2) in order for the Draft Crawley Borough Local Plan 2024 – 2040 (published in May 2023) to be considered sound.</p> <p>The Site The Site is located adjacent to the eastern boundary of Crawley Town Centre, approximately 400 metres northeast of Crawley Train Station. The Site currently consists of 18 trade/commercial units originally granted</p>

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			<p>planning permission under use classes B1c (now E(g)(iii) (industrial process)), B2, and B8. The tenants include Screwfix, Halfords Autocentre, Bathstore, Energie Fitness Crawley and Formula One Autocentres. The Site is accessed off a roundabout on the A2220/Haslett Avenue. To the east, west and south of the Site, there are industrial uses and to the north, beyond the A2220/Haslett Avenue, is a residential area. The Site is located in a highly accessible area which is in walking distance to Crawley Train Station and in immediate proximity to multiple bus stops, including Town Centre East, Town Centre South, Rowan Close and Haslett Avenue East. Including the national train network, this location grants access to several bus routes, including, 3, 4, 5, 20 Fastway, 100 Fastway, 62, 84, 272, 281, 291, 400 Route 400, 603. The locally accessible public transport network provides the Site with excellent accessibility to both local and national areas.</p>  <p>Figure 1: The Site (outlined by the blue boundary line) (Source: Promap).</p> <p>Planning History Planning permission was granted on 9 June 2000 for the erection of 18 units, associated car parking and landscaping for either Use Class B1c (now E(g)(iii) (industrial process)), B2 and B8 uses with ancillary showroom or a Sui Generis (Motor/vehicle showroom) use in units 1, 2, 7, 8, 9 and 10. Since the original permission, there have been several applications relating to change of use, and the Site now operates under a range of uses, including Use Class A1 (now E (retail)), B1c, B2, B8 and D2 (now Sui Generis).</p> <p>Adopted Planning Policy The Crawley Borough Local Plan 2015 – 2030 was adopted in December 2015. Policy EC2 ‘Economic Growth in Main Employment Areas’ designates the Site within the ‘Three Bridges Corridor’ Main Employment Area. The Site is also designated as part of a Priority Area for District Energy Networks as identified in Policy ENV7 ‘District Energy Networks’. The western part of the Site is also within a ‘Long Distance View Splay’ as designated by Policy CH8 ‘Important Views’.</p>

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			<p>Submission Draft Local Plan</p> <p>The Submission Draft Local Plan 2024 – 2040 proposes to continue designating the Site as a Main Employment Area under Draft Policy EC2 ‘Economic Growth in Main Employment Areas’. The Draft Policy seeks to protect and improve the existing economic areas, maximising the potential to utilise existing employment sites before other sites are considered. The Submission Draft Local Plan also proposes to continue designating the Site within a Priority Area for District Energy Networks under Draft Policy SDC2 ‘District Energy Networks’. The Draft Policy identifies that all development proposals within a priority area that would involve the creation of a new dwelling or over 1,000 sqm of internal floor space must incorporate an energy strategy. Additionally, the Draft Local Plan Map shows that the western part of the Site is proposed to continue to be within the Tilgate Park Long Distance View Splay as designated under Draft Policy CL7 ‘Important and Valued Views’.</p> <p>USS Response</p> <p>The following sections consider the soundness of the Submission Draft Local Plan when assessed against the effective and consistent national policy tests of the National Planning Policy Framework (NPPF).</p> <p>Emerging Local Plan Policy</p> <p>USS generally supports CBC’s commitment to the proposed continued designation of the Site as a Main Employment Area under Draft Policy EC2 ‘Economic Growth in Main Employment Areas’.</p> <p>However, the Draft Policy identifies that any development which involves a net loss of employment land or floor space will only be permitted where it can be demonstrated that: “i. the site is no longer suitable, nor viable, nor appropriate for employment purposes, or that a small loss of employment floorspace will support the wider economic use of the site; and ii. the loss of any land or floorspace will result in 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”.</p> <p>For the Submission Draft Local Plan to be effective, USS recommends that more flexibility is applied to Draft Policy EC2 ‘Economic Growth in Main Employment Areas’ to allow the potential for mixed-use development on such sites to come forward including changing typologies such as co-location of employment uses with other land uses and industrial intensification.</p> <p>The draft policy, as it is worded, focuses on the loss of employment land and employment floor space in Main Employment Areas rather than the amount and type of employment itself.</p> <p>Draft Policy EC2 should also recognise that the amount of employment land or floorspace does not necessarily equate to the level of employment on a site. For example, an alternative use could have a smaller footprint yet employ more people than a B2 / B8 use.</p>

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			<p>The Policy should therefore assess the proposed level of employment to be provided from new development when evaluating the circumstances whereby a loss of employment land and employment floor space is considered permissible in accordance with Draft Policy EC2.</p> <p>Employment areas are susceptible to change in line with economic and market circumstances and consequently require flexibility to adapt to these changes. This is acknowledged in the NPPF, paragraph 122 states that planning policies and decisions need to reflect changes in the demand for land. Paragraph 11a states that plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. Paragraph 82d states that planning policies should “be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances”.</p> <p>In line with the NPPF, the Policy as drafted does not address the growth in co-location of industry and other land uses (including residential), which is representative of the changing typologies that will grow across the plan period. In order to ensure Draft Policy EC2 ‘Economic Growth in Main Employment Areas’ is consistent with the aforementioned paragraphs of the NPPF, it is essential that it is sufficiently flexible to accommodate a mix of uses which support employment alongside residential in innovative development typologies, e.g. the stacking of industrial and residential uses. A mixture of uses in employment locations can help support the vitality and character of the wider area and its economic performance. The potential introduction of well-planned residential uses on such sites can support existing uses by increasing the local customer base and the available workforce near the Main Employment Areas. It would also serve to boost CBC’s housing delivery.</p> <p>Furthermore, this would reflect CBC’s Compact Residential Development Study (May 2023) which highlights the benefits of residential uses in proximity to employment uses is recognised. When considering the proximity of employment and residential uses, paragraph 1.24 states that “compact development can significantly reduce this daily loss of time, allowing more for family, friends, leisure and overall quality of life”.</p> <p>This benefits to be derived from intensification and compact development are further developed within the Compact Residential Development Study (May 2023). Paragraph 1.27 states: “Intensification and new compact development form offers the opportunity for so many of the existing urban areas in the UK to be physically improved and enhanced, even for the reinvention of existing area wide built environments. The nation’s less attractive, isolated low-density places could lend themselves to such change and transformation can be economically attractive.”</p> <p>This above text extract demonstrates how emerging policy should be worded in a flexible manner which encourages development that achieves intensification and new compact development form, this should encourage a flexible form of development which matches the market needs of Crawley. Notably, paragraph 5.11 states that intensification will particularly apply to areas within the Town Centre and other locations which are</p>

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			<p>already well served by high frequency, reliable public transport, notably, the Site benefits from these qualities. As a result, USS considers it appropriate to word the emerging policies in a manner which allows for a greater degree of flexibility for development within its designated Main Employment Area including the introduction of residential. A proposed rewording of Draft Policy EC2 is provided at Appendix 1.</p> <p>Identified Housing Need Policy H1 'Housing Provision' of the Submission Draft Crawley Borough Local Plan 2024 – 2040, makes provision for the development of a minimum of 5,030 net dwellings in the Borough from 2024 to 2040. Once this supply is deducted from the identified housing need of 12,080 dwellings over the period 2024 to 2040, there will be a remaining unmet housing need of approximately 7,050 dwellings arising from Crawley over the Plan period (42%). The draft Local Plan proposes for the remaining unmet housing need to be met through neighbouring authorities within the Housing Market Area, with the intention being to secure this provision through the Duty to Cooperate.</p> <p>As identified within Table 3.2 of the Duty to Cooperate Statement, May 2023, within the Local Plan evidence base, this housing provision from neighbouring authorities has not been agreed upon via a Statement of Common Ground, and discussions are ongoing. Based on a review of information contained within the evidence base, it is unclear how CBC expects the unmet housing need of 7,050 dwellings to be delivered and split out between the neighbouring authorities. Within the draft Local Plan, it is acknowledged that this unmet need will primarily be provided by Horsham and Mid Sussex, along with a small part of Reigate and Banstead. The adopted Local Plan for Horsham (adopted 2018) and Mid Sussex (adopted 2015) provide an anticipated provision of an additional 3,000 dwellings above their individual housing needs to meet Crawley's unmet housing need. This number of 'additional' housing provision is likely to be further diminished when the relevant adopted Local Plan undergoes a review as the Standard Method increases their own housing requirements to above their current adopted Plan commitments. In any case, the current provision of 3,000 dwellings is significantly below the identified unmet housing need of 7,050 dwellings. Furthermore, in relation to the provision of housing provision within Reigate and Banstead, within the Local Plan evidence base, a signed Statement of Common Ground between CBC and Reigate and Banstead Borough Council (RBBC) states that RBBC is not in a position to meet any of CBC's unmet housing need. At this stage of Local Plan preparation, it is reasonably considered that CBC cannot rely on the Duty to Cooperate to deliver 7,050 dwellings.</p> <p>In order for the Local Plan to be considered sound, it should also seek to introduce a greater degree of flexibility for Main Employment Areas within the Borough's boundaries to provide for mixed use. This would ensure Draft Policy EC2 is consistent with national policy by allowing Main Employment Areas to contribute to CBC meeting its housing target and reflect the changing landscape of industrial provision. Appendix 1 sets out a proposed rewording of Draft Policy EC2, which is intended to provide greater flexibility and ensure the 'soundness' of the Local Plan.</p>

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			<p>Conclusion</p> <p>In summary, USS strongly recommends that CBC amend Policy EC2 to provide additional flexibility to ensure that the emerging document does not hinder the ability of Main Employment Areas to provide appropriate mixed / alternative development. USS is pleased to have the opportunity to respond to this Draft Submission Local Plan consultation and requests to be informed on the progress of the document.</p> <p>Suggested Modifications:</p> <p>Appendix</p> <p>Appendix 1: Draft Policy EC2 'Economic Growth in Main Employment Areas'</p> <p>Wording within the Submission Draft Local Plan 2024 – 2040: "Development that would involve a net loss of employment land or floorspace in any Main Employment Area will only be permitted where it is demonstrated that: i. the site is no longer suitable, nor viable, nor appropriate for employment purposes, or that a small loss of employment floorspace will support the wider economic use of the site; and ii. the loss of any land or floorspace will result in 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".</p> <p>USS suggested rewording of Draft Policy EC2: "Development that would involve a net loss of employment land or floorspace, including the introduction of alternative uses, such as residential, in any Main Employment Area will only be permitted where it is demonstrated that should seek to demonstrate a consideration of the following elements when justifying the proposals: i. the site is no longer suitable, nor viable, nor appropriate for employment purposes, or that a small loss of employment floorspace will support the wider economic use of the site; and ii. the loss of any land or floorspace will result in 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".</p>
REP/144	BYM Capital	EC2	<p>Draft Policy EC2</p> <p>We support this policy in principle; however, we object to the absence of any recognition that net loss of employment land or floorspace could be acceptable in a case where an alternative typology of employment use is provided.</p> <p>Suggested Modifications:</p> <p>As drafted, the policy is not positively prepared nor justified. To rectify this, we request a further limb (iv) is added to the net loss criteria stating:</p> <p>'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:</p> <p>...</p> <p>iv) an alternative employment use would be more appropriate to meet objectively assessed needs, or, to ensure the viability of the site.'</p>

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REP/151	Manor Royal BID	Article 4 – EC2 Para 9.33	<p>Article 4 Directions for Manor Royal removing Permitted Development Rights (para 9.33): The Manor Royal BID is wholly supportive of this approach in order to safeguard the core function of Manor Royal as a business location that might otherwise be undermined by inappropriate and non-compatible (residential) uses. Therefore; <u><i>The Manor Royal BID seeks reassurances from the Council about the protections for Manor Royal to prevent unplanned residential development in the business district and the impact of Class E that could undermine the prime function of Manor Royal.</i></u></p> <p>Suggested Modifications:</p>
REP/032 (2023)	West Sussex County Council	Minerals and Waste 9.51 EC3	<p>Minerals and Waste Reference to the West Sussex Joint Minerals Local Plan, 2018 (Partial Review 2021) and the West Sussex Waste Local Plan (2014) as forming part of the development plan for Crawley Borough should be included in the Planning Policy Context. It is noted that reference to the West Sussex Joint Minerals Local Plan in (new para. 9.51) has been amended to since our previous comments but this has not been amended in Appendix B. para. 9.46 (new para. 9.51) and Appendix.</p> <p>Suggested Modifications: Paragraph 005 of the Planning Practice Guidance states that; “District Councils show Mineral Safeguarding Areas on their policy maps”. The Local Plan map currently does not show the brick clay safeguarding area (including buffer zone) and it is requested that this is included as a modification to the Plan. The safeguarded railhead also includes a buffer zone which does not need to be shown on the Local Plan map. The buffer zone is included in the Mineral Consultation Area (MCA) for consultation purposes only.</p>
REP/050 (2023)	Homes England	EC3	<p>Rowley Farm - EC3: Manor Royal We support the principles of this policy. It highlights the importance of the Manor Royal to the economic growth of Crawley and the Gatwick Diamond more generally. We welcome the policy direction that this business district should be enhanced through development. We also note that the policy welcomes development that is compatible with the area's economic function and that any development over a certain size will require a contribution to public realm improvements in Manor Royal. Within the supporting text paragraph 9.46 of this policy, it is highlighted that land is in short supply around Manor Royal, and the Draft Crawley Local Plan should take a positive approach to the growth of the industrial area, which is supported.</p> <p>As discussed further under Policy GAT2 below, if Rowley Farm is removed from the Gatwick Safeguarding Zone following a change in national aviation policy, the Site would present a prime location for the expansion of Manor Park to the North. The Site is suitable for several employments uses and would present a prime opportunity for the growth of Manor Royal.</p> <p>Suggested Modifications:</p>

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REP/144	BYM Capital	EC3	<p>Draft Policy EC3</p> <p>We support this policy in principle; however, we object to paragraph 5 which specifically requires explicit ‘accordance’ with the Manor Royal SPD. This guidance could be considered out of date having been published in 2013 (c. 10 years old), and in any event should only be afforded weight in decision making as a material consideration. Newly adopted policy should not require explicit accordance with guidance, let alone guidance from 2013 which could be considered out of date. This approach is not justified and the reference should be deleted accordingly.</p> <p>Suggested Modifications:</p>
REP/151	Manor Royal BID	EC3 – Para 9.47	<p>Business Hub and facilities (para 9.47, policy EC3): The Manor Royal BID is encouraged to see specific reference for the need to provide better support facilities that might be accommodated in the form of a “Business Hub” and its importance for attracting and retaining businesses. Therefore; <i><u>Beyond a general supportive statement to this effect, the Manor Royal BID encourages the Council to take positive action to encourage development of these facilities, to work with the BID to bring them forward over the plan period, to be specific about the ideal location for such facilities and to actively pursue opportunities to deliver the Business Hub, for example when considering the development of the Innovation Centre.</u></i></p> <p>Suggested Modifications:</p>
REP/011 (2023)	National Highways	EC4	<p>The policy should include the need for a vision to be developed for the site, as a matter of priority, which sets an outcome communities want to achieve and provides the sustainable transport solutions to deliver this outcome (‘vision and validate’ – see Circular 1/2022, para.15). The focus should be on reducing the overall need to travel and maximising opportunities for walking, wheeling, cycling, public transport and shared travel. This would help reduce reliance on the SRN for local journeys.</p> <p>NH suggest that this vision and transport solutions should feature in a masterplan prepared for the site. The masterplan should also consider how design can minimise the exposure to strategic traffic, for example a landscape buffer or sensitive screening to shield the environment and development from M23 noise.</p> <p>The policy needs to address the construction phase and how impacts, especially on the SRN, can be effectively eliminated or acceptably reduced to the satisfaction of NH.</p> <p>Suggested Modifications:</p>
REP/027 (2023)	LRM Planning on behalf of WT Lamb Properties, the	EC4	<p>STRATEGIC POLICY EC4: STRATEGIC EMPLOYMENT LOCATION</p> <p>1. On behalf of our clients, we are supportive of the principle of allocating Gatwick Green as a Strategic employment site. Indeed, the allocation can provide a substantive contribution towards future economic growth in a suitable location that is of regional importance. In this regard our clients confirm their commitment to ensuring</p>

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	Dye Family and Elliott Metals/the Simmonds Family		<p>delivery in partnership with the Council and The Wilky Group (hereafter TWG) if the entire area was to be allocated as we suggest is necessary in order to make the plan sound.</p> <p>2. As set out in our representations in respect of Policy EC1 we believe that the minimum amount of land required in order to meet needs is 34ha (approximately 102,000 sqm of floorspace). The current area of land proposed to be allocated by EC4 is a major underestimation of the requirement necessary. As such in order to ensure the requirements can be met the area to be allocated must be extended to include the missing section of land that forms part of the wider area envisaged by TWG in their representations.</p> <p>3. Our clients control 8.8 ha of the missing section of Gatwick Green and confirm that it is available for employment uses in line with the requirements of the Plan. Accordingly, our clients are of the view that the allocation area should be extended to cover the missing section of the area to the east of Balcombe Road that is within their control.</p> <p>4. They support the proactive and positive view that the Council have taken towards allocating land in this area and are committed to a comprehensive approach to the master planning of Gatwick Green in order to ensure a robust approach is taken. They confirm that land that they own / control is available, deliverable and viable, in this regard they would work with TWG to feed into any future planning application for the entire area and indeed to the strategic vision for the site. This supersedes previous representations that have been made in relation to the area.</p> <p>5. Significant technical work has previously been undertaken in the area including in respect of highways, landscape, ecology and drainage. Accordingly the following additional information is submitted as an appendices to this representation: 1. Red line plan; 2. Illustrative master plan; 3. Development Framework Document; 4. Transport Note Prepared by Miles White Transport; 5. Ecology Note Prepared by GE; 6. Landscape Note prepared by Pegasus; 7. Drainage Strategy prepared by PHG; and 8. Water Neutrality Strategy by Quantum CE.</p> <p>6. The information submitted confirms that the site could contribute towards the requirement in technical terms and it is anticipated that this would be updated to align and integrate with the technical work undertaken by TWG and feed into a comprehensive master plan and EIA.</p> <p>7. Indeed, our clients believe that a positive response is required locally in order to ensure the future economic recovery and growth of Crawley such that the authority is no longer entirely reliant upon the fortunes of Gatwick Airport.</p> <p>National Planning Policy</p> <p>8. The National Planning Policy Framework (NPPF) (2021) establishes the Government's planning policies for England and how they are to be applied. It provides a framework within which locally prepared plans can be produced (paragraph 1).</p>

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			<p>9. Paragraph 15 of the NPPF states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area, a framework for addressing economic, social and environmental priorities, and a platform for local people to shape their surroundings.</p> <p>10. Plans should: be prepared with the objective of contributing to sustainable development; be positively prepared, but deliverable; shaped by effective engagement; contain policies that are clearly written and unambiguous; be accessible through the use of digital tools; and serve a clear purpose (paragraph 16).</p> <p>11. Development plans must include strategic policies to address an area's priorities for development and the use of land (paragraph 17). Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for inter alia housing; employment; retail; leisure; other commercial development; infrastructure; community facilities; and the conservation and enhancement of the natural, built and historic environment and measures to address climate change (paragraph 20).</p> <p>12. Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to the long-term requirements for infrastructure (paragraph 22). The preparation and review of policies should be underpinned by relevant and up-to-date evidence, that should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned (paragraph 31).</p> <p>13. Local plans will be examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound (paragraph 35). Plans are sound if they are: a) Positively prepared – provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities; b) Justified –provide an appropriate strategy, taking into account other reasonable alternatives, based on proportionate evidence; c) Effective – deliverable over the plan period and based on effective joint working on cross-boundary strategic matters; and d) Consistent with national policy – enabling the delivery of sustainable development in accordance with policies within the NPPF.</p> <p>14. As it is currently written Policy EC4 does not meet the tests of soundness rather a more comprehensive and long term approach to the strategic vision for the area (in this plan period and beyond) needs to be taken in order to address the evidence base shortcomings and increase the supply of employment land as set out in our representations in respect of Policy EC1. In this regard, a comprehensive approach to the future planning of Gatwick Green is required that includes allocating our clients site as part of a wider area.</p> <p>The site</p> <p>15. Our clients control land shown within the accompanying red line plan (appendix 1) that lies to the east of Balcombe Road and occupies the substantive "missing section" of the proposed allocation of EC4 which is crucial to facilitating a comprehensive and well planned approach to development.</p> <p>16. The total site area is 8.8 ha, and comprises three elements:</p>

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			<ul style="list-style-type: none"> • The WT Lamb site (3.1ha) comprises an existing residential bungalow at the front and the rear of the site was previously used for horticultural purposes and comprised over 17,000 sq.ft of glass greenhouses and other ancillary structures associated with its commercial nursery use. However, the greenhouses were unused for some time and fell into considerable disrepair with significant glass and fly tipping across the site • Land and buildings owned by the Dye Family (5ha) which is formed by three distinct parcels of land to the north and south of Hunters Lodge and MSL Heat Treatment – a manufacturing company operating from the buildings to the rear of Hunters Lodge who intend to remain on site. The land surrounding is generally flat and the three fields are in an agricultural use. • Land under the ownership of Elliott Metals/The Simmonds Family (0.7 ha) that lies to the rear of the family metal recycling centre (Elliott Metals). This is a family business that has operated at the premises for over 80 years. The land to the rear of the metal business is vacant, flat and suitable for redevelopment. It is yet to be determined whether the metal business would relocate or remain at the site. However if they decided to remain it would be complimentary to future employment opportunities. The three landholdings comprise a significant landholding that totals 8.8 ha. 17. <p>It is bound:</p> <ul style="list-style-type: none"> • to the east the boundary is formed by a line of trees along Donkey Lane which a small residential lane beyond which is the proposed allocation SE4 along with incremental businesses and landholdings. Further to the East lies the M23; • to the south by Fernhill Road and Elliott Metals along with a number of small residential dwellings with allocation SE4 further to the south of Fernhill Road; • to the north the site is bounded by an existing fields which are part of proposed allocation SE4 and a residential dwelling. Slightly further to the north lies the M23 Spur; and • to the west the site is found by the Balcombe Road, immediately beyond which is the vast complex of Gatwick Airport (as defined by policies in respect of Gatwick Airport) which comprises offices, hotels as well as the airport itself. <p>18. It is clear that the site and wider Gatwick Green proposal lies within a highly urbanised part of the District with major infrastructure of national significance forming the overarching land use in the local area. Our clients sites form left over land that is perfectly suited to help capitalise on these national infrastructure linkages.</p> <p>19. Our clients landholdings provide a logical and important part of the future Gatwick Green proposals.</p> <p>Gatwick Green</p> <p>20. As noted, we are supportive in general of the allocation of Gatwick Green for employment purposes. The Wilky Group (TWG) submitted the proposed employment opportunity to the Council as part of the previous</p>

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			<p>consultation version of the plan. The site submitted by TWG comprised about 59 ha (146 acres), including 8.8 ha controlled by our clients.</p> <p>21. In this regard, TWG set out that Gatwick Green as a whole represents a regionally and nationally significant opportunity for high quality mixed-use economic growth that will solve Crawley Borough's growing deficit of employment land as identified in its employment land evidence base. They sought to provide sufficient information to confirm that it will be delivered during the plan period and that it therefore address the five considerations identified by Crawley Borough Council in its Regulation 18 consultation, of note they covered:</p> <ul style="list-style-type: none"> • Suitability of the site for employment development. • Availability or likely availability of the site for employment development. • The economic viability of delivering employment on the site. • The amount of employment development which can be delivered on the site. • The likely time-frame for any employment delivery projected for the site. <p>22. In the context of the urgent need to plan and provide for the unmet and long-standing employment and economic needs of the Borough TWG have submitted evidence to indicate that Gatwick Green would meet the Policy tests of the Council (plainly only part of the wider area has been indicated to be available to date). Our clients support the position in respect of the suitability of the site, availability and viability of the site as a whole, indeed, they confirm that the land within their control is available.</p> <p>23. Indeed, our clients consider that Gatwick Green is a highly suitable site for strategic employment. In view of its close proximity and accessibility to Gatwick Airport, it is well suited to bringing forward a high-quality business hub to optimise the potential of this strategic location at the confluence of several national transport infrastructure networks – Gatwick Airport, London Brighton Mainline Rail, the Gatwick Express service, the M23 motorway and the Crawley-Gatwick-Horley Fastway bus service.</p> <p>24. It is noted that the site is not affected by any significant environmental, physical or heritage constraints and could be developed within the current / future aircraft noise environment and aerodrome safeguarding requirements relating to the Airport.</p> <p>Site capacity</p> <p>25. A Development Framework Plan (DFP) has been prepared by TWG to assess the high-level capacity of the site and demonstrate its ability to incorporate a range of sustainability and environmental requirements arising out of national and local planning policy and other statutory requirements. The DFP has assessed the land and floorspace potential of the entire site of 59 ha to provide mixed employment floorspace in use classes B8, B1, B2 and C1, including ancillary uses within use classes A1 - A4 and D1.</p> <p>26. It is stated that Gatwick Green is a proposed integrated mixed-use development and co-ordinated infrastructure solution. They anticipate that the development could comprise the following:</p>

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			<ul style="list-style-type: none"> • B8, B1(c), B2, industrial, warehousing, distribution and logistics. • B1 office/R&D. • GEA of C1 hotel use. • Supporting education uses for apprenticeships & staff training. • An integrated amenity centre including ancillary shopping, leisure, dining and community uses. • High quality open space with mobility interchange hub. • Sustainable mobility at the heart of the masterplan design, with dedicated public transport, pedestrian and cycle infrastructure. • Ancillary car parking with Electric Vehicle Charging facilities. <p>27. It is further noted that “Gatwick Green represents a strategic opportunity to bring forward a highly sustainable mixed-use employment area, offering a unique opportunity to deliver significant benefits to all three of the key components of sustainability. Whilst the site will be a focus for B8 and B2 class floorspace, it has the benefit given its highly accessible location, of being attractive to a mix of non-B class employment uses such as education and training. This will help the site to come forward more quickly given its wider appeal to a number of different sectors and investors (delivery partners). It will also enable the site to deliver a greater variety of jobs to help transform and rebalance the economy and benefit the local community.”</p> <p>28. It is clear that TWG consider that the entire area of Gatwick Green (59ha) is suitable for development as supported by their evidence base and as supplemented by our clients. We support this position and confirm that their combined sites are available to contribute towards this wider allocation.</p> <p>29. In its current form it is notable that TWG do not control all of the site and as such its ability to provide a comprehensive development solution is undermined. This has left a large area allocated to provide just 13 ha of development land despite the significantly higher employment need (as set out in our representation in respect of Policy EC1) and capacity of the area. Our clients can confirm that they would work alongside TWG and the Council in any future proposals for the entire site.</p>

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30. Accordingly in order to achieve the requirement figure and a comprehensive approach to the area, then a combination of reviewing the Development Framework and with the addition of our clients site, a larger and more comprehensive allocation of 57ha (comprising our clients site along with TWG land) would allow for a net development area of at least 34ha to be achieved and provide the required B2/B8 floorspace figure. In this regard, our clients would work with the Council and TWG to ensure a joined up approach to delivery.

Our clients site

31. As shown within the supporting Development Framework Document, our clients site comprises 8.8 ha of land that could accommodate: - Employment floor space of approximately 25,000 sqm (subject to final mix) comprising:

- B8 employment uses including frontage development along Balcombe Road;
- Smaller scale general industrial uses to meet a need in Crawley that is not currently catered for;
 - The potential for a high quality “gateway” with access provided to the very heart of the site;
 - A new access from Balcombe Road that could serve the subject site but would also be able to link in to the wider TWG proposals;
 - Water neutrality along with potential to contribute towards the rest of the allocation through an on site well;
 - Green infrastructure on site including necessary open space, landscape / ecology buffers; and
 - Surface water attenuation if required.

32. Our clients site could be developed on its own, however, they recognise the strategic importance of the wider Gatwick Green Allocation and as such envisage that it would come forward as part of the comprehensive proposals for the site and are committed to this approach. In this regard, they confirm that they would work jointly

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			<p>on any future planning application with TWG and Council in order to ensure a deliverable and comprehensive approach is taken.</p> <p>Comprehensive Approach to Development</p> <p>33. A significant amount of technical work has been undertaken to date in respect of the site, in addition to the submission made as part of TWG submission, it is noted that further work has been prepared in respect of the 8.8ha site in respect of Design, Landscape, Ecology, Accessibility, Transport and Drainage. A summary of this is set out below. It is anticipated that this would supplement the work undertaken by TWG and is capable of integrating with this.</p> <p>Design</p> <p>34. The National Planning Policy Framework makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. The National Design Guide, illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice. The Guide is clear that “Well-designed places have individual characteristics which work together to create its physical Character. The ten characteristics help to nurture and sustain a sense of Community. They work to positively address environmental issues affecting Climate. They all contribute towards the cross-cutting themes for good design set out in the National Planning Policy Framework.”</p> <p>35. The guidance identifies 10 characteristics of good design which summarily cover the following elements and must form the starting point for the future design of the proposals:</p> <ol style="list-style-type: none"> 1. Context: well designed places are based on a sound understanding of the features of the site and the surrounding context. They are integrated into their surroundings so they relate well to them; 2. Identity: well designed places have a positive and coherent identity that everyone can identify with and a character that suits the context; 3. Built Form: relates to the pattern / arrangement of development blocks, streets, buildings and open spaces which together create the built environment rather than individually; 4. Movement: whereby well designed spaces provide a clear pattern of streets and encourage access for all via a wide range of means of sustainable travel; 5. Nature: which requires natural features and biodiversity to be integrated into future proposals. 6. Public Spaces: with well design and well located public spaces within a hierarchy of locations and available to ensure an excellent environment; 7. Uses: with support given to a range of mixes that support everyday activities; 8. Buildings: that provide high quality living and working conditions; 9. Resources: places that limit their environmental impact; and 10. Lifespan: places that are designed over the longer term.

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			<p>36. Furthermore, the National Planning Policy Framework expects local planning authorities to develop local design guides, taking account of the National Design Guide and the National Model Design Code. Given the issues that we have raised in respect of site capacity and the development framework plan proposed by TWG, we are of the view that it is appropriate to undertake a thorough master planning exercise. Indeed, the National Model Design Code is clear that for larger schemes such an approach “can help to maintain consistency in the delivery of development over a longer period of time.” Government policy would expect this to provide more specific and visual guidance than is possible within policy wording to include: the layout of new development, how landscaping should be approached, factors to consider in the design of building, environmental performance and approach to local vernacular and heritage, architecture and materials.</p> <p>37. Indeed, it is clear from national guidance that a comprehensive approach to larger developments such as Gatwick Green is required that deals with the longer term (which may even fall outside of the plan period). This will be particularly important for Gatwick Green given that our clients “missing section” is a logical starting point for development along the Balcombe Road (adjacent to the airport) and ought to be phased ahead of the more remote parts of the eastern section of the site that are constrained by residential properties and parcel shapes (for B2/B8 uses).</p> <p>38. It is noted therefore that consideration of our clients site as part of the allocation and a more thorough design process (as considered important by TWG in their regulation 18 submission) includes:</p> <ul style="list-style-type: none"> • A comprehensive approach to development and the creation of an appropriate environment in line with Government policies on design and master planning; • Provision of sufficient gross area to safeguard the approach to green infrastructure identified within TWG development framework and ensure sufficient developable land to deliver the required amount of B2/B8 uses; • An additional access from Balcombe Road with options to link into TWG site to the south and north; • A more logical phasing of development meaning that land at our clients site along the Balcombe Road and adjacent to the airport is delivered earlier within the development period than the eastern parts of the wider site that are more sensitive to existing residential properties; • Scope for seeking low energy forms of development and improving access to the area to ensure a “green” development in terms of energy efficiency; • A joined up approach to landscape, ecological enhancement and surface water attenuation which will help provide a master plan that is predicated on the delivery of significant green infrastructure; and • A comprehensive framework for the future of the area rather than simply moving forward on the basis of the area of land considered available in 2020. <p>Landscape</p>

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			<p>39. A baseline landscape note has been undertaken by Pegasus based on more detailed technical work already carried out. It has considered a number of key issues and will form the basis for a future more detailed study that would feed into an outline planning application.</p> <p>40. The Site is comprised of a number of fields that are either vacant or in agricultural use interspersed with trees and hedgerows. The site is not covered by any designation at a national or regional level that recognises a specific landscape importance.</p> <p>41. The site is located between Fernhill Road and Balcombe Road, to the east of Gatwick Airport and close to the M23 motorway, including a spur which provides a connection to the airport. The site is made up of a series of mostly irregular shaped agricultural fields, with the inclusion of a number of buildings including Hunters Lodge and an agricultural outbuilding to the west and Fernlands and a residential building between Fernhill Road and Donkey Lane to the south-east.</p> <p>42. The site is surrounded by a number of residential, farm and employment buildings off the surrounding road network. Land to the north and south of Fernhill Road is predominantly agricultural, with the M23 forming a prominent visual detractor in the surrounding landscape. The landscape to the west is dominated by car parking, employment buildings, hotels and retail uses.</p> <p>43. A public right of way (3675Sy) is located adjacent to the eastern site boundary, which provide a rural link between Fernhill Road and Balcombe Road to the north-west of the site. Close to the south-east corner of the site, another public right of way (359sy) follows a fenced off track adjacent to car parking associated with Gatwick Airport, before heading further southward and connecting to Radford Road. The Sussex Border Path long distance footpath is located to the east and north of the site, where it follows Peeks Brook Lane to the east before crossing the M23 and heading westward adjacent to the motorway. The Tandridge Border Path long distance footpath links with the Sussex Border Path east of the M23 and to the north-east of the site.</p> <p>44. A dense network of mature trees surrounds Fernlands and the residential building to the south-east, which follow Donkey Lane and the public right of way. A tree lined hedgerow aligns most of Fernhill Road, coupled with residential properties and their associated garden vegetation, limits visibility into the site. Where the site abuts Balcombe Road (B2036) the site is defined by clipped field boundary hedgerows, with occasional matures trees within the hedgerows further to the south, which provides a more open aspect from the road. A mature tree belt defines the north-eastern and northern boundaries, which provides visual enclosure. The internal field boundaries are of variable quality, with those most established appearing to the north.</p> <p>45. Views towards the site from surrounding areas are well contained by the surrounding network of mature vegetation. Therefore, views are limited to the network of roads and footpaths either adjacent to or in the vicinity of the site, and do not extend beyond the M23 or the areas of woodland to the south and south-west.</p>

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			<p>46. The following landscape and visual opportunities and constraints are shown on the supporting plan and set out below.</p> <p>Opportunities</p> <p>47. The principal landscape and visual opportunities for the site comprise:</p> <ul style="list-style-type: none"> • the potential to manage and enhance the existing field boundaries and mature trees, to provide visual enclosure and to enhance wildlife benefits; • the potential to manage and enhance the internal network of field boundary hedgerows; • the potential to enhance the local wildlife and biodiversity through new planting and the introduction of new landscape features; • the potential to provide improved connections to the surrounding roads and public footpaths; and • the potential to enhance the intimate landscape area to the south-east for recreation and/or local wildlife. <p>Constraints</p> <p>48. The principal landscape and visual constraints for the site comprise:</p> <ul style="list-style-type: none"> • Openness of Balcombe Road with clear and unobstructed views over western parts of the site; • The potential for the area of biodiversity enhancement to the north of the site to restrict development; • potential loss of existing site features including trees and hedgerows, in particular, to the southeast; • potential to adversely affect the visual amenity of local residences, particularly those abutting the site along Fernhill Road and Balcombe Road; and • potential to adversely affect the visual amenity of vehicles and walkers using surrounding rural roads and the network of public footpaths. <p>Design Considerations</p> <p>49. To assist the design development of future design proposals that mitigate the landscape and visual constraints identified, a number of design considerations are set out below.</p> <p>Vegetation Pattern</p> <ul style="list-style-type: none"> • Existing vegetation to the north and east and adjacent to Fernhill Road must be retained and respected, as well as augmented wherever possible. • The internal network of field boundary vegetation must be respected by any development layout and enhanced. • Any development needs to be set back from Balcombe Road (B2036), to allow for the addition of new structural planting along the western and south-western edges of the site. • Development proposals must adhere to the guidance set out in the county and local landscape character assessments. The creation of a recreational or wildlife area to the south-east should be considered in order to respect the existing trees and vegetation and respect the intimate setting of the landscape.

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			<ul style="list-style-type: none"> Any new planting or landscape features should aim to enhance the value of the site to local wildlife, in particular, where located within Biodiversity Opportunity Areas to the north as defined by Policy ENV2 of the local plan and shown on the landscape and visual opportunities and constraints plan. Any trees lost as a result of the development must adhere to tree replacement in accordance with Crawley District Councils Policy CH6, based upon tree replacement tree planting in relation to trunk diameter of the tree lost. Development should avoid any impacts upon trees and vegetation within adjacent properties. All landscape proposals must adhere to the guidance in relation to planting in proximity to airports, and in accordance with CAP 772: Wildlife Hazard Management at Aerodromes. <p>Built Form</p> <ul style="list-style-type: none"> The development should reflect the height, scale and massing of similar surrounding buildings in the vicinity of the site and be minimised wherever possible. The development should allow for sustainable movement around the site and look for opportunities to improve pedestrian and cycle links in the local area. <p>Surrounding Land Uses</p> <ul style="list-style-type: none"> Any development must be appropriately offset from the adjacent residential properties to respect their visual amenity. The development must respect the setting of the listed buildings to the east of the site, as well as other surrounding locally listed buildings further to the east and those listed buildings to the west. Any development must ensure that the setting of the public right of way is respected, with mitigation within the site to limit views toward development proposals. <p>Ecology</p> <p>50. GE Consulting has been commissioned to prepare a Ecology Technical Note to accompany representations to the draft local plan consultation in relation to land at. It aims to</p> <ul style="list-style-type: none"> Draw together previous ecological survey work and provide an overview of baseline conditions; Evaluate the requirements of a proposal in terms of biodiversity planning policy and legislation; Review initial constraints and opportunities for the Site and propose likely mitigation measures/design considerations; and Detail further ecological survey work required to inform detailed proposals and a future planning application. <p>51. In summary it is concluded that there are no in principle ecological constraints preventing allocation of this Site for future development.</p> <p>52. Furthermore, they note that the Site is unlikely to be constrained by the presence of statutory designated sites for nature conservation in the local area, subject to further assessment and possible mitigation including:</p>

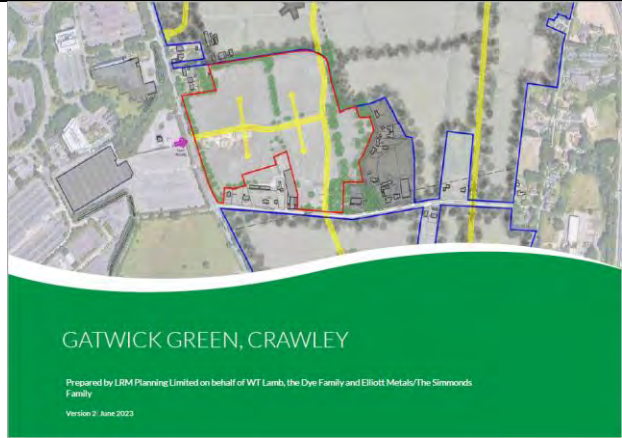
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			<ul style="list-style-type: none"> • Habitat retention should focus on those features of highest ecological value, contributing to local conservation strategies/priorities where possible; • Development should aim to retain and incorporate features for protected and notable species, including a network of wildlife corridors through and around the Site; • Development proposals seeking to ensure that biodiversity net gain can be achieved; and • Detailed design and any future planning applications should be informed by further ecological survey work as recommended however there unlikely to be any overarching constraints. <p>Transport</p> <p>53. Miles White Transport (MWT) have been appointed to provide traffic and transportation advice in relation to the proposed development of land close to Gatwick Airport between Crawley and Horley in West Sussex. MWT have formulated a proposed Transport Strategy that will enable the site to be developed as part of the adjacent Gatwick Green Strategic Employment Location.</p> <p>54. They propose that the 8.8 ha site can be accessed from a new traffic signal controlled junction on Balcombe Road approximately 150m north of Fernhill Road. The proposed signal controlled junction would provide two lanes on Balcombe Road on the approaches to the junction and accords with highway design guidance for the speeds recorded on this part of Balcombe Road. In addition linkages can be provided to TWG site.</p> <p>55. The provision of a new signal controlled junction in this location will help reduce vehicle speeds (possibly in conjunction with a Traffic Regulation Order to formally reduce the speed limit) and improve road safety on this part of Balcombe Road.</p> <p>56. New footway and cycleway infrastructure and facilities will be provided as part of the development of the Fernlands site that will seek to maximise pedestrian and cycling links to the existing transport network and also to the wider Gatwick Green site area.</p> <p>Integration with Wider Gatwick Green Site</p> <p>57. The proposed access to the site could provide one of the additional access points that TWG are considering. The internal access road could link directly into the TWG land or connect via the north-south multi-modal transport link shown in green in TWG's development framework. Such an approach would enable the development and sustainable transport infrastructure at Gatwick Green to be provided in a comprehensive manner as suggested by TWG. Our clients would work collaboratively with TWG in this regard in order to ensure a comprehensive approach is taken.</p> <p>Mobility Strategy</p> <p>58. A package of travel planning measures and initiatives will be formulated to reduce the need to travel using the private car (single occupancy trips) and maximise travel by sustainable modes of transport. This could include the following:</p>

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			<ul style="list-style-type: none"> • Provision of a Mobility Station/Hub to integrate the various forms of transport proposed to/from/within the site and provide “first and last mile solutions” to connect communities to frequent public transport services. • Provision of hire schemes (electric bike, pedal cycle, e-scooter, e-cargo bike etc). • Electric car club and car sharing scheme. • Dynamic Demand Responsive Transport (DDRT) using advanced and real time requests (dial-a-ride, shared taxis). • Use of new mobility technology (e.g. Mobility as a Service – Maas – platform). <p>59. These travel planning measures would be formulated in conjunction with others (TWG, Crawley Borough Council, West Sussex County Council etc) to ensure they fully align with the desired mobility strategy for the wider Gatwick Green area.</p> <p>Impact</p> <p>60. An assessment considers that the proposed site access will operate well within capacity with minimal delays and queues in the 2026 design year with the traffic associated with the subject site.</p> <p>61. Our clients site has modelled the impact of between 14,780 sq.m (based on the Crawley Council assumptions of density) and up to 46,290 sq.m (based on TWG assumptions) additional employment land (depending upon the final composition). At the lower level, it is expected this would generate 63 and 52 vehicle trips in the AM and PM peaks respectively, i.e. approximately 1 vehicle per minute. It is considered unlikely that the addition of 1 vehicle trip per minute will result in additional junctions being in need of physical mitigation. For the higher level there would be 277 and 236 respectively, which would still operate well within the capacity of the network.</p> <p>62. Whilst the impact of the site has not been modelled in the CTS, it is our view that the mitigation identified in the CTS will adequately cater for the relatively small number of additional vehicle trips associated with this land and thus the conclusions of the CTS will not alter with the addition of our clients site.</p> <p>Drainage</p> <p>63. PHG Consulting Engineers have reviewed the available information to assess the hydrology in the area of the proposed development site. It has been concluded that there is a very low risk of fluvial flooding and the low risk of surface water flooding can be reduced with the introduction of sitespecific positive drainage.</p> <p>64. They note that the surface water drainage strategy for the site should restrict discharge to the calculated QBAR greenfield runoff rate, this would ensure that during rainfall events greater than the predicted 1 in 2 year event discharge from the site post-development would be reduced. Base on the site area of 9.18ha consisting of 60% impermeable surfacing the QBAR greenfield runoff rate has been calculated to be 28.6l/s. To maximise the benefits of a SuDS approach to surface water management, the use of swales to convey water should be considered and the final attenuation should be provided in a landscaped basin (or basins). This will ensure the</p>

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			<p>surface water drainage network maximises amenity and biodiversity benefits whilst reducing the volume and rates of runoff. The masterplan should allow space within landscaped areas for attenuation basins to be provided. Any attenuation feature within the site should be designed to accommodate flows up to and including the 1 in 100 year with a 40% increased for climate change. To ensure exceedance can be managed, a minimum freeboard of 300mm should be included. Given the above parameters, a 1.5m deep basin with 1 in 3 banks covering a surface area of approximately 3,670m² and providing 4,500m³ storage would be required. Further SuDS techniques such as porous surfaces can be utilised to reduce the overall size of surface water attenuation required.</p> <p>65. Foul Sewer records have been obtained from Thames Water and show few existing foul sewers with the vicinity of the development. The development is surrounded by green fields, Gatwick Airport and some smaller development/dwellings. The dwellings in the vicinity of the site are likely to have individual treatment plants and Gatwick Airport would be served by a private drainage system. The nearest Public Sewers are located approximately 600m south of the development in Balcombe Road. Sewer records show that the existing manhole (7801) at the start of this run has an invert level of 57.54m and the public sewer discharges to a pumping station. The pumping station is assumed to have a direct discharge to Crawley Sewerage Treatment Works located 300m to the west. Due site levels and the invert level of the existing manhole, a pumping station will be required to discharge to the Thames Water network. The pumping station would also include an offsite rising main being laid in Balcombe Road, approximately 500m long. 66. It is expected that both foul and surface water could be dealt with either through a standalone scheme for the site or as part of a coordinated approach with TWG land.</p> <p>Appendix 3: Development Framework Document</p>

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A comprehensive solution for Gatwick Green

WT Lamb, the Dye Family and Elliott Metals/The Simmonds Family control the "missing section" of proposed Strategic allocation EC4. The landowners have joined together in order to provide an option for a comprehensive approach to development of the area for employment purposes.

It is recognised that over the course of 2020 and into 2021 the unparalleled impacts of COVID 19 on the airline industry and indeed the local economy mean that it is now more important than ever to ensure that the Borough is well placed to fully recover economically and secure the future of its residents.

Accordingly our clients believe that their land holdings can help the Council plan robustly for future economic recovery and prosperity. It is considered that our clients land holdings allow for comprehensive planning of the area and not a piecemeal and incremental approach.

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			<div data-bbox="929 391 1176 446"> <h1>1</h1> <h2>Introduction</h2> </div> <div data-bbox="1014 475 1077 488"> <h3>1.1 Background</h3> </div> <div data-bbox="1014 491 1256 544"> <p>This document has been prepared by LHM Planning on behalf of WY Land, the Dyer Family and Elliott Metals/The Simmonds Family and sets out how their combined landholdings can contribute towards the Gatwick Green proposals. Between them, our clients own 8.8ha of land that is critical to the missing section of the Gatwick Green Proposal.</p> </div> <div data-bbox="1014 547 1256 580"> <p>Our clients consider that there is an opportunity to plan comprehensively for the entire Gatwick Green area not just elements of it and confirm that the site is available for £200 employment locations.</p> </div> <div data-bbox="1014 584 1256 617"> <p>There are significant methodological weaknesses with the level of employment land provided for within policy EC1 and as such, it is considered that there will be a need to identify further allocations in order to make the plan sound.</p> </div> <div data-bbox="1014 620 1256 652"> <p>Accordingly, a comprehensive approach towards Gatwick Green will significantly help to fulfil this objective and place the borough on track to fully recover economically and secure the future of its residents.</p> </div>

Fig 2. The old memory of Farnhill Road

2

The Site

2.1 Introduction

The total site (figure 2) area is 8.8ha, and comprises the following:

- The WY Land site (2.3ha) comprises an existing residential bungalow at the front and the rear of the site was previously used for horticultural purposes and comprised over 37,000 sqm of glass greenhouses and other ancillary structures associated with its commercial nursery use. However, the greenhouses were removed for some time and fell into considerable disrepair with significant glass and fly tipping across the site.
- Land and buildings owned by the Dyer Family (3ha) which is formed by three distinct parcels of land to the north and south of Hunter's Lodge and MS1, Heat Treatment - a manufacturing company operating from the buildings to the rear of Hunter's Lodge who intend to remain on site. The land surrounding is generally flat and the three fields are in an agricultural use.
- Land under the ownership of Elliott Metals/The Simmonds family (3.2ha) that lies to the rear of the family metal recycling centre (Elliott Metals). This is a family business that has operated at the premises for over 80 years. The land to the rear of the metal business is vacant, flat and suitable for redevelopment. It is yet to be determined whether the metal business would relocate or remain at the site. However it is currently outside of the red line area and given its use would be complementary to future employment opportunities.

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The three landholdings comprise a significant landholding that totals 8.8ha. It is bound:

- to the east the boundary is formed by a line of trees along Donkey Lane which is a small residential lane beyond which is the proposed allocation SE4 along with incremental businesses and landholdings. Further to the East lies the M23;
- to the south by Farnhill Road and Elliott Metals along with a number of small residential dwellings with allocation SE4 further to the south of Farnhill Road;
- to the north the site is bounded by an existing fields which are part of proposed allocation SE4 and a residential dwelling, slightly further to the north lies the M23 Spur; and
- to the west the site is bound by the Balcombe Road. Immediately beyond which is the vast complex of Gatwick Airport as defined within the Local Plan) which comprises offices, hotels as well as the airport itself.

It is clear that the site and wider Gatwick Green proposal lies within a highly urbanised part of the District with major infrastructure of national significance forming the overarching land use in the local area. Our clients sites form left over land that is perfectly suited to help capitalise on these national infrastructure linkages.

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Location

The site forms part of the wider Gatwick Green area as promoted by the Wilky Group. It is located adjacent to Gatwick Airport operational land with the M32 Spur to the north and the M23 to the west. Crawley lies to the south. It is framed by infrastructure of national significance.







It is located east of the B2036 Balcombe Road and west of Peeko Brook Lane. The site area is bounded to the north by the M23 Spur and the south by the B2037 Antlands Lane.

The B2036 Balcombe Road provides a broadly north-south link between the A23 to the north of Horley town centre and Balcombe to the south, and beyond as London Road/Brook Street to the A272 close to Cuckfield.











Balcombe Road is a single carriageway road and is subject to the national speed limit (40mph). The speed limit decreases to 40mph approximately 400m south and 450m north of the site boundary.

Farnhill Road runs east-west along much of the south of the Farnhill site between Peeko Brook Lane and Balcombe Road. It is a rural single lane road with no footways or street lighting.


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			<div data-bbox="703 280 1319 719"> <p>Fig 3 view of the site from Baltimore Road</p>  </div> <div data-bbox="1384 280 1816 748"> <p>Fig 4 the combination of low quality land alongside existing industrial buildings on site</p>  </div> <div data-bbox="1816 280 2047 748"> <p>Fig 5 existing industrial buildings and structures on site</p>  </div> <div data-bbox="703 810 1290 1262"> <p>Fig 6 details area within the site previously used as a large scale nursery</p>  </div> <div data-bbox="1408 810 1816 1262"> <p>Fig 7 details parts of the site</p>  </div> <div data-bbox="1823 810 2047 1262"> <p>Fig 8 Ferndal Road</p> <p>Fig 9 existing buildings on site</p>  </div>

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			<div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;">  <p>Fig 10 elements of the site used for agricultural purposes</p>  <p>Fig 11 fields in the western part of the site</p> </div> <div style="width: 50%;">  <p>Fig 12 view from the site towards the north</p>  <p>Fig 13 view from the site towards the north</p> </div> </div> <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;">  <p>Fig 14 setting back on Fennell Road to be demolished</p>  <p>Fig 15 industrial units within the ownership of Elliott Metals</p> </div> <div style="width: 50%;">  <p>Fig 16 Fennell House along Fennell Road</p>  <p>Fig 17 building off Fennell Road</p> </div> </div> <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;">  <p>Fig 18 building off Fennell Road</p> </div> <div style="width: 50%;">  <p>Fig 19 empty car park at Cotwick</p> </div> </div>

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			<div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"> <p data-bbox="725 288 976 300">Fig 20: The site with empty car parking and major infrastructure at Gatwick airport in the background</p>  <p data-bbox="725 536 936 547">Fig 21: The site with traffic on Dulcombe Road visible and Gatwick airport beyond</p>  </div> <div style="width: 50%;"> <p data-bbox="1442 691 1570 702">Fig 22: Gatwick airport at full capacity during 2019</p>  <p data-bbox="1442 722 1464 734">Page 10</p> </div> </div> <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"> <p data-bbox="763 1217 943 1228">Fig 23: Gatwick airport following the impacts of COVID 19 during 2021</p>  <p data-bbox="1442 1246 1464 1257">Page 20</p> </div> <div style="width: 50%;"> <h3 data-bbox="1615 927 1957 1026">3 Gatwick Green Proposals by The Wilky Group</h3> <p data-bbox="1720 1050 1794 1061">3.1 Introduction</p> <p data-bbox="1720 1070 1980 1121">The Wilky Group (TWG) submitted the proposed Gatwick Green employment opportunity to the Council as part of the previous consultation version of the plan. The Site is identified on the plan at Figure 24 which shows the extent of the Gatwick Green opportunity, comprising about 59ha (146 acres), including c.8.9ha controlled by our clients.</p> <p data-bbox="1720 1129 1980 1201">Our clients support TWG view that Gatwick Green represents a regionally and nationally significant opportunity for high quality economic growth that will solve Crawley Borough's growing deficit of employment land as identified in its employment land evidence base. However, we are strongly of the view that the current proposed allocation (S C 4) must reflect the comprehensive area in order to ensure the proper planning of the area over the long term and to deliver the required employment land supply.</p> <p data-bbox="1442 1246 1464 1257">Page 20</p> </div> </div>

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Fig.24 The site framework proposed by TWG for Gatwick Green

TWG Proposals

A Development Framework Plan (DFP) has been prepared by TWG to access the high-level capacity of the site and demonstrate its ability to incorporate a range of sustainability and environmental requirements arising out of national and local planning policy and other statutory requirements.

It is stated that Gatwick Green is a proposed integrated mixed-use development and coordinated infrastructure solution. They anticipate that the development could comprise the following:

- B8, B10, B2, industrial, warehousing, distribution and logistics.
- B1 office / RSD.
- C1 hotel use.
- Supporting education uses for apprenticeships & staff training.
- An integrated amenity centre including ancillary shopping, leisure, dining and community uses.
- High quality open space with mobility interchange hub.
- Sustainable mobility at the heart of the masterplan design, with dedicated public transport, pedestrian and cycle infrastructure.
- Ancillary car parking with Electric Vehicle Charging facilities.

It is further noted that "Gatwick Green represents a strategic opportunity to bring forward a highly sustainable mixed-use employment area, offering a unique opportunity to deliver significant benefits to all three of the key components of sustainability. Whilst the site will be a focus for B8 and B2 class floorspace, it has the benefit given its highly accessible location, of being attractive to a mix of non-B class employment uses such as education and training. This will help the site to come forward more quickly given its wider appeal to a number of different sectors and investors (delivery partners). It will also enable the site to deliver a greater variety of jobs to help transform and rebalance the economy and benefit the local community."

Sustainability

TWG considered that Gatwick Green is a highly suitable site for strategic employment, in view of its close proximity and accessibility to Gatwick Airport. It is well suited to bringing forward a high-quality business hub to optimise the potential of this strategic location at the confluence of several national transport infrastructure networks – Gatwick Airport, London Brighton Mainline Rail, the Gatwick Express service, the M23 motorway and the Crawley-Gatwick-Horley Fastway bus service.

The site is not affected by any significant environmental, physical or heritage constraints and could be developed within the current/future aircraft noise environment and aerodrome safeguarding requirements relating to the Airport.

A number of evidence based documents have been prepared to support the allocation of Gatwick Green for strategic employment. These include in

respect of transport, ecology and landscape.

This site is also considered to be complementary to Gatwick Airport's growth plan in its Master Plan 2018, including the ECC for the use of the standby runway. Overall, the site is considered to be highly suitable for strategic employment, supported by evidence from Savills review of employment land requirements.

Delivery timeframe

TWG indicate that Gatwick Green could be developed as a mixed-use proposal that achieves a higher density and a better site optimisation than other locations, in particular the built-out parcels and planning to de-risk delivery, benefit from agglomeration, and deliver wider economic benefits. On this basis, it is considered that the market could support a build out over 7 to 10 years leading around 2035.

Key Considerations

It is clear that TWG consider that the entire area of Gatwick Green is suitable for development, as supported by their evidence base and as supplemented by our clients. We support this position and confirm that their completed site are available to contribute towards this wider allocation.

into our view form (it is notable that TWG do not control all of the site and in fact its ability to provide a comprehensive development solution is undermined). This has left an area of site controlled by TWG Group that is allocated by Policy EC4 rather than the comprehensive approach that their submission was based on. As a result the development framework proposed

includes potential parcels and strips of land that have limited potential for employment purposes and are constrained by surrounding land uses.

In this regard our clients would be committed to work with TWG and the Council in any future master plan for the area.

4

Gatwick Green Missing Section

4.1 Introduction

The proposal forms a key missing "section" of the wider Gatwick Green proposals to enable a comprehensive rather than piecemeal approach to the planning of the area.

The proposed contribution that the site can make includes:

- Employment floor space of approximately 25,000 sqm (subject to final and comprising B8 employment uses and smaller scale general industrial uses);
- The potential for a high-quality "gateway" with access the heart of the site;
- A new access from Balcombe Road that could serve the subject site but also link in to the wider TWG proposals;
- Green infrastructure on site including necessary open space, landscape/ecology buffers; and
- Surface water attenuation if required.

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Key design principles

A number of key principles have guided the proposals, which include:

- A comprehensive approach to development and the creation of an appropriate environment taking account of local context in line with Government policies on design and master planning;
- Provision of sufficient gross area to safeguard the approach to green infrastructure identified within TWG development framework and ensure sufficient developable land to deliver the required amount of B2/BB uses;
- Access from Balcombe Road with additional options to link into TWG site to the south and north;
- A more logical phasing of development meaning that land at our clients site along the Balcombe Road and adjacent to the airport is delivered earlier within the development period than the more remote eastern parts of the wider site that are more sensitive to existing residential properties;
- Scope for seeking low energy forms of development and improving access to the area to ensure a "green" development in terms of energy efficiency;
- A joined up approach to landscapes, ecological enhancement and surface water attenuation which will help provide a master plan that is predicated on the delivery of significant green infrastructure; and

- A comprehensive framework for the future of the area rather than simply moving forward on the basis of the area of land considered available in 2020. In this regard our clients are committed to working jointly with the Council and TWG in order to ensure that the future employment aspirations are achieved.
- Strategic delivery alongside TWG in a collaborative approach.

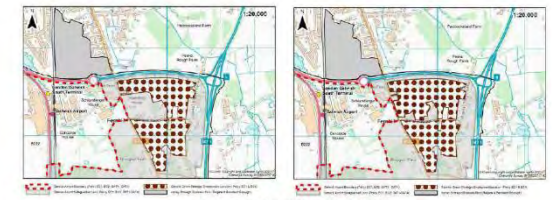


Fig 27: The gap to policy 214, 215, and 216 and a red line right with our clients site

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		<p>5 Technical Considerations</p> <p>5.1 Introduction</p> <p>In order to help shape proposals, a range of background studies and investigations have been undertaken.</p> <p>This section sets out a summary of the key findings of these assessments. Full details are set out within the various reports prepared. It considers the initial potential impacts of the proposals to give an overview of their acceptability and would be updated to integrate with the work undertaken by TWG, including:</p> <ul style="list-style-type: none"> National Policy (RAM Planning); Landscape Impact (Pegasus); Ecology (GL); Transport (Miss White Transport); Hydrology (PSC); and Water Neutrality (Quantum CE). 	<p>National Planning Policy</p> <p>Employment Land</p> <p>Chapter 8 of the National Planning Policy Framework (NPPF) sets out the Government's requirements for "Building a strong, competitive economy", Para. 8(1) in case that planning policies should help create the conditions in which businesses can invest, expand and adapt."</p> <p>It places significant weight on supporting economic growth and productivity taking account of local business needs and wider opportunities for development. Such that each area builds on its strengths, counters any weaknesses and addresses the challenge of the future. It is clear that areas with high levels of productivity should be allowed to capitalise on their potential so that Britain can be a global leader in innovation driving productivity improvements is the core vision contained in the Government's Industrial Strategy.</p> <p>Para. 8(1) sets out that Policies should:</p> <ul style="list-style-type: none"> proactively and positively encourage sustainable economic growth with regard to Local Industrial Strategies and other policies for economic development; identify strategic sites for local and inward investment to match the strategy and to meet anticipated need; address any barriers to investment; and
		<p>market requirements, and consultation with relevant organisations and study business trends, modes and employment statistics, taking account of longer term economic cycles. This work will reveal any quantitative or qualitative mismatches in demand and supply, and which market segments are under or over-supplied. Councils should look at a range of robust data to understand the requirements for office, general business and distribution space and which market segments are over/under supplied.</p> <p>PPG contains specific guidance on the needs of the logistics sector given its role in the efficient supply of goods, and therefore economic productivity which is a key part of the UK Industrial Strategy. It goes on to note that strategic logistics facilities need significant amount of land with access to strategic transport networks and that where a need exists. Councils should collaborate with infrastructure providers and other interested parties to identify the scale of need. Likewise, Councils need to understand the needs of specialist or new sectors including through clustering of certain industries to support collaboration, innovation, productivity and sustainability.</p> <p>Overall therefore, the NPPF and PPG requires that plan making authorities must address their economic needs in their local plans, which requires an overriding strategy on how and where those needs are to be met. This is critical to achieving a Plan that is sound in accordance with the tests in the NPPF (para 35).</p>	<p>8. Movement: whereby well designed spaces provide a clear pattern of streets and encourage access for all via a wide range of means of sustainable travel.</p> <p>9. Nature: which requires natural features and biodiversity to be integrated into future proposals.</p> <p>10. Lifespan: places that are designed over the longer term.</p> <p>Furthermore, the National Planning Policy Framework expects local planning authorities to develop local design guides, taking account of the National Design Guide and the National Model Design Code. Given the issues that we have raised in respect of site capacity, and the developer Frameworks plan proposed by TWG, we are of the view that it is appropriate to undertake a thorough master planning and design code exercise. Indeed, the National Model Design Code is clear that it indicates that "For large schemes, design codes can help to maintain consistency in the delivery of development over a longer period of time."</p>

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			<p style="text-align: right;">Gatwick Green Section 2</p> <h2 style="text-align: center;">Landscape</h2> <p>A baseline landscape study has been undertaken by Pegasus based on more detailed technical work already carried out. It has considered a number of key issues and will form the basis for a future more detailed study that would feed into an outline planning application.</p> <p>The site is comprised of a number of fields that are either vacant or in agricultural use interspersed with trees and hedgerows. The site is not covered by any designation at a national or regional level that requires a specific landscape importance.</p> <p>The site lies within the corridor of a long distance view from Target Hill Park to the south west of Cowley, as identified under Policy CH9 of Crawley District Council's Local Plan. The aim of the policy is to ensure the view remains unobstructed by development in the foreground, however, it is noted that the site is approximately 1km to the north west of the corridor.</p> <p>The site is located within an area defined as the North East Crawley Rural Fringe, as identified under Policy CH9 of Crawley District Council's Local Plan. The policy states:</p> <p>'To ensure that Crawley's compact nature and attractive setting is maintained, development should:</p> <ol style="list-style-type: none"> i. Be grouped where possible with existing buildings to minimise impact on visual amenity; ii. Be located to avoid the loss of important on-site views and off-site views towards important landscape features; <p>iii. Reflect local character and distinctiveness in terms of form, height, scale, plot shape and site, elevation, roofline and pitch, overall colour, texture and boundary treatment (walls, hedges, fences and gates);</p> <p>iv. Minimise the impact of lighting to avoid blurring the distinctions between urban and rural areas and in areas which are intrinsically dark to avoid light pollution to the night sky;</p> <p>v. Ensure the building and any outdoor storage and parking areas are not visually prominent in the landscape;</p> <p>vi. Does not generate an unacceptable level and/or frequency of noise in areas relatively undisturbed by noise and/or other factors for their recreational or amenity value;</p> <p>vii. Does not generate traffic of a type or amount inappropriate to the rural roads; and</p> <p>viii. Does not introduce a use which by virtue of its operation is not compatible with the countryside.</p> <p>Where harm to the landscape character cannot be avoided, appropriate mitigation and, as a last resort, compensation, will be required as part of a planning application. Applicants are advised to consider the enhancement opportunities identified in the Crawley Borough Council's Landscape Character Assessment.'</p> <p>Under Policy CH9, it specifically states in relation to North East Crawley Rural Fringe:</p> <p style="text-align: right;">page 34</p> <p style="text-align: right;">Fig 28 Landscape and visual opportunities plan</p> <p style="text-align: right;">page 34</p>
			<p style="text-align: right;">Gatwick Green Section 3</p> <p>separate identities of Gatwick Airport, Crawley and Horley</p> <ul style="list-style-type: none"> • Incremental development should be resisted to prevent the actual and perceived reduction in the highly valued open character of this area. • Proposals should follow the wider planning and land management guidelines of the Low Weald Northern Vales Character Area. <p>Context</p> <p>The site is located between Fernhill Road and Balcombe Road, to the east of Gatwick Airport and close to the M23 motorway, including a row which provides a connection to the airport. The site is made up of a series of mostly irregular shaped agricultural fields, with the inclusion of a number of buildings including Hatters Lodge and an agricultural outbuilding to the west and Fernlands and an office building between Fernhill Road and Donkey Lane to the south-west.</p> <p>The site is surrounded by a number of residential, farm and employment buildings off the surrounding road network. Land to the north and south of Fernhill Road is predominantly agricultural, with the M23 forming a prominent visual detector in the surrounding landscape. The landscape to the west is dominated by car parking, employment buildings, hedges and outcrops.</p> <p>A public right of way (B6755a) is located adjacent to the eastern site boundary, which provide a rural link between Fernhill Road and Balcombe Road to the north-west of the site. Close to the south-west corner of the site, another public right of way (B6755) follows a fenced off track adjacent to car parking associated with Gatwick Airport, before heading further southward and connecting to Balford Road. The Sussex Border Path long distance footpath is located to the east and north of the site, where it follows Peak's Brook Lane to the east before crossing the M23 and heading westward adjacent to the motorway. The Landridge Border Path long distance footpath links with the Sussex Border Path east of the M23 and to the north-west of the site.</p> <p>A dense network of mature trees surrounds Fernlands and the office building to the south-west, which follow Donkey Lane and the public right of way. A tree lined hedgerow aligns most of Fernhill Road, located with residential properties and their associated garden vegetation, leads visibility into the site. Where the site abuts Balcombe Road (B2034) the site is defined by clipped field boundaries/hedgerows, with occasional mature trees within the hedgerows further to the south, which provides a more open aspect from the road. A mature tree belt defines the north-eastern and northern boundaries, which provides visual enclosure. The internal field boundaries are of variable quality, with those most established appearing to the north.</p> <p>Views towards the site from surrounding areas are well contained by the surrounding network of mature vegetation. Therefore, views are limited to the network of roads and footpaths either adjacent to or in the vicinity of the site, and do not extend beyond the M23 or the areas of woodland to the south and south-west.</p> <p>Opportunities and Constraints</p> <p>The following landscape and visual opportunities and constraints are shown on the accompanying plan and set out below.</p> <p style="text-align: right;">page 35</p> <p>Opportunities</p> <p>The principal landscape and visual opportunities for the site comprise:</p> <ul style="list-style-type: none"> • The potential to manage and enhance the existing field boundaries and mature trees, to provide visual enclosure and to enhance wildlife benefits; • The potential to manage and enhance the internal network of field boundary hedgerows; • The potential to enhance the local wildlife and biodiversity through view planning and the introduction of new landscape features; • The potential to provide improved connections to the surrounding roads and public footpaths; and • The potential to enhance the intimate landscape area to the south-east for recreation and/or local wildlife. <p>Constraints</p> <p>The principal landscape and visual constraints for the site comprise:</p> <ul style="list-style-type: none"> • Openness of Balcombe Road with clear and unobstructed views over western parts of the site; • The potential for the area of biodiversity enhancement to the north of the site to restrict development; <p style="text-align: right;">page 35</p> <p>• Promote the establishment of field margins in arable areas.</p> <p>• Conserve historic lanes with their ancient oaks and unimproved roadside verges.</p> <p>• Focus on the enhancement of the major transport corridors, seeking better integration into the existing field pattern of the wider landscape.</p> <p>• Ensure any small scale development responds to the historic dispersed settlement pattern and local design and materials.</p> <p>• Ensure any new development around the urban edge, in particular ... Crawley, is well integrated with the wider landscape pattern. Encourage bold native woodland and hedgerow planting. Buildings should also blend in with the landscape in scale, form, colour and design.</p> <p>• Encourage screen planting of native trees and woodland around roadside buildings and service areas, and industrial and commercial development, including Gatwick Airport.</p> <p>At a local level, the site is located within Area 6 – High Woodland Fringes Landscape Character Area. The area is identified as having high landscape value, but a moderate sensitivity to change, being sensitive to elements such as large scale commercial and residential development and the condition of the landscape is considered to be declining due to increasing visual/noise intrusion in some parts. The planning guidelines for the landscape character area are as follows:</p> <ul style="list-style-type: none"> • Proposals must respect the important role of the area to maintaining the <p>• potential loss of existing site features including trees and hedgerows, in particular, to the south-west;</p> <p>• potential to adversely affect the visual amenity of local residential, particularly those abutting the site along Fernhill Road and Balcombe Road; and</p> <p>• potential to adversely affect the visual amenity of vehicles and walkers using surrounding rural roads and the network of public footpaths.</p> <p>Design Considerations</p> <p>To assist the design development of future design proposals that mitigate the landscape and visual constraints identified, a number of design considerations are set out below.</p> <p>Vegetation Pattern</p> <p>Existing vegetation to the north and east and adjacent to Fernhill Road must be retained and respected, as well as augmented wherever possible.</p> <p>The internal network of field boundary vegetation must be respected by any development layout and enhanced.</p> <p>Any development needs to be set back from Balcombe Road (B2034), to allow for the addition of new structural planting along the western and south-western edges of the site.</p> <p>Development proposals must adhere to the guidance set out in the county</p>

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			<div data-bbox="712 295 1344 742"> <p>GATWICK GREEN - LANDSCAPE AND VISUAL OPPORTUNITIES AND CONSTRAINTS</p> <p>Page 18</p> </div> <div data-bbox="712 909 996 1212"> <h3>Ecology</h3> <p>GE Consulting has been commissioned to prepare a Ecology Technical Note to accompany the application for the site local access contribution in 2024/25. It aims to:</p> <ul style="list-style-type: none"> Draw together previous ecological survey work and provide an overview of baseline conditions; Evaluate the requirements of a proposal in terms of biodiversity planning policy and legislation; Review initial constraints, and opportunities for the site and provide likely mitigation measures/ design considerations; and Detail further ecological survey work required to inform detailed proposals and a future planning application. <p>Statutory Designated Sites</p> <p>There are no National Site Network sites, which includes SACs and SPA, within 10km. However, a Draft Habitats Regulation Assessment of the Draft Crawley Borough Council Local Plan (June 2023) has screened in specific impacts relating to development at Gatwick Green:</p> <ul style="list-style-type: none"> Mole Gap to Triggle Equipment SAC, 11.3km north-west Ashdown Forest SAC/SPA, 12.5km south-east; The Mers SAC, 30km south-west; and </div> <div data-bbox="1008 909 1344 1212"> <p>• Aron Valley SAC/SPA Ramsar, 33km south-west.</p> <p>There are no statutory sites (such as SSSI or LNR) within 2km of the Site. Furthermore, the Site does not lie within any</p> <p>Non-statutory Sites</p> <p>There are two non-statutory sites of County importance located within 1km:</p> <ul style="list-style-type: none"> Horsham Wood Local Wildlife Site (LWS), 0.8km south-west. Important for ancient coppice-with-standards bluebell woodland; and The Roughs LWS, 0.9km north-west, important for ancient semi-natural woodland and locally rare heaved-lease viewpoint. <p>Local Priority/Key Biodiversity Sites/Conservation Strategies</p> <p>Biodiversity Opportunity Areas</p> <p>Biodiversity Opportunity Areas (BOAs) are landscape scale areas which have been identified as supporting high concentrations of Habitats and Species of Principal Importance (HPI/ SPI) and/or have the potential to support opportunities for restoration and creation of habitats. They seek to expand, link and buffer important biodiversity sites to provide an ecological network.</p> <p>The Gatwick Wood BOA lies partially within the Site boundary, excluding the southern and western fields. This area is described within the Crawley Green Infrastructure SPD (2016) as:</p> </div> <div data-bbox="1366 406 1691 742"> <p>and local landscape character assessments, as set out in paragraphs 6 and 7 above.</p> <p>The creation of a recreational or wildlife area to the south east should be considered in order to respect the existing trees and vegetation and respect the intimate setting of the landscape.</p> <p>Any new planting or landscape features should aim to enhance the value of the site to local wildlife, in particular, where located within Biodiversity Opportunity Areas to the north as defined by Policy DM2 of the local plan and shown on the landscape and visual opportunities and constraints plan.</p> <p>Any trees lost as a result of the development must adhere to tree replacement in accordance with Crawley District Councils Policy CH6, based upon tree replacement three planting in relation to trunk diameter of the tree lost.</p> <p>Development should avoid any impacts upon trees and vegetation within adjacent properties.</p> <p>All landscape proposals must adhere to the guidance in relation to planting in proximity to airports, and in accordance with CAP 172: Wildlife Hazard Management at Aerodromes.</p> <p>Built Form</p> <p>The development should reflect the height, scale and massing of similar surrounding buildings in the vicinity of the site and be minimised wherever possible.</p> <p>Page 18</p> </div> <div data-bbox="1366 909 1691 1276"> <p>dominated by the Gatwick Airport landscape but contains a small amount of ancient woodland amongst agricultural land where the opportunities for biodiversity gain and landowner liaison are tangible.</p> <ul style="list-style-type: none"> Woodland management and restoration; Education and community engagement, including links to health; Increased site designation; Working with and attracting new businesses; Ecological networks; Visitor facilities; <p>Natural England National Habitat Network</p> <p>Natural England have developed an England wide dataset of zones where action may be undertaken to build greater ecological resilience. These zones are based around existing HPIs, or 'primary habitats' and comprise:</p> <ul style="list-style-type: none"> Network Zone 1: land within close proximity to the primary habitat what are more likely to be suitable for creation of the same habitat type. Network Zone 2: land within close proximity to the primary habitat that are unlikely to be suitable for creation of the primary habitat, but where other types of habitat may be created or green infrastructure delivered. <p>Page 18</p> </div> <div data-bbox="1702 406 2027 1276"> <p>The development should allow for sustainable movement around the site and look for opportunities to improve pedestrian and cycle links in the local area.</p> <p>Surrounding Land Uses</p> <p>Any development must be appropriately offset from the adjacent residential properties to respect their visual amenity.</p> <p>The development must respect the setting of the listed buildings to the west of the site, as well as other surrounding locally listed buildings further to the east and those listed buildings to the west.</p> <p>Any development must ensure that the setting of the public right of way is respected, with mitigation within the site to limit views toward development proposals.</p> <p>The Site does not lie within any National Habitat Network zones.</p> <p>Habitats & Flora</p> <p>Priority Habitats</p> <p>A review of MAGIC shows HPI 'Deciduous Woodland' occupying the eastern field and surrounding the property off Farm Hill Road (see Appendix 4). The field appears from aerial imagery to comprise grassland and would therefore require ground truthing.</p> <p>No other HPIs are indicated on MAGIC within or adjacent to the Site boundary, however the network of hedgerows within the Site are likely to meet HPI criteria.</p> <p>Ornithological Habitats</p> <p>The Site comprises six distinct fields, properties with associated gardens, small areas of woodland and boundary trees and hedgerows.</p> <p>Fields within the north and west of the Site comprise poor semi-improved</p> <p>Page 18</p> </div>

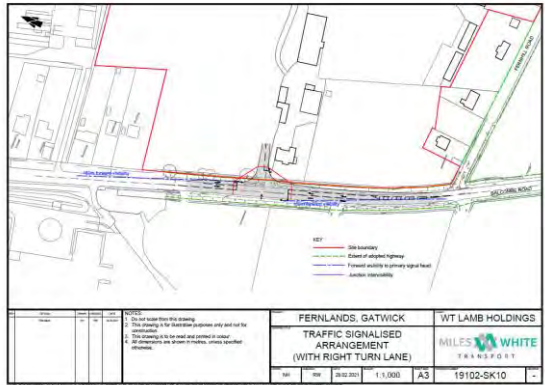
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			<div data-bbox="784 295 1310 742" data-label="Figure"> <p>Figure 27: Ecological summary map showing site boundaries, access roads, and various habitat types. The map includes a legend for 'Site Boundary', 'Access Road', and 'Habitat Types'. It also features a scale bar and a north arrow.</p> </div> <div data-bbox="1433 406 1982 694" data-label="Text"> <p>grassland, managed by cutting (The Ecology Co-ops, 2020). A central field, not surveyed as part of previous work, appears to comprise rough grassland and scattered trees, possibly a former orchard. Seasonally wet ditches are present including along the northern, southern and western boundaries of the Site.</p> <p>Two residential properties are present: 'Hunters Lodge' along the eastern boundary accessible from Balcombe Road and 'Fernlands' along southern boundary accessible from Fernhill Road, along with associated outbuildings. Gardens comprised ornamental planting, scattered ornamental and coniferous trees and regularly mown species-poor lawns. A further property, 'Fernhill House' is bound to the east of Fernlands in an area of unsurveyed land. It is surrounded by car parking, amenity grassland and semi-mature trees.</p> <p>During previous survey work, the field north of Fernlands (Banglow) has been cleared and converted to bare, disturbed soil with limited areas of poor semi-improved grassland following clearance of waste and former glasshouses (CSA Environmental, 2017). Aerial imagery suggests this previously comprised a mosaic of grassland trees and scattered scrub and is now likely to comprise grassland habitat. Similarly, the eastern field (imposed as woodland on MAPCs) appears to have been felled since 2015 as indicated on historical imagery, however mature boundaries have been retained.</p> <p>The field boundaries are marked by species-poor hedgerows, many with banks, dominated by blackthorn and Hawthorn with occasional standard trees. Some of the linear boundaries of the Site are marked by mature tree</p> <p>lines, scrub, hedges or walls. North of Fernlands is a line of mature oak and ash trees.</p> <p>Dispersive woodlands are present to the east of Fernlands, comprising mostly semi-mature oak and silver birch, with occasional ash, hazel, holly and conifer species.</p> <p>In terms of value, hedgerows (and their associated trees) and broadleaved woodland are habitats of Principal Importance listed in Section 4.1 of the NERC Act 2006.</p> <p>Flora</p> <p>Previous survey work has not identified any notable or invasive plants within the Site.</p> <p>Protected and Notable Flora</p> <p>Based on the desk-based study and walkover surveys, the following protected and notable faunal species were considered to be present/likely potential to be present:</p> <ul style="list-style-type: none"> Badger – no signs found however footprints and dead badger recorded at Balcombe Road in 2020 indicate local presence. There may be sets in unsurveyed parts of the Site and the fields offer foraging potential. Bats – A residential (Banglow/Hunters) Lodge and agricultural barn off Balcombe Road provide roosting sites and low potential for roosting bats respectively (The Ecology Co-ops, 2020). Fernlands (Banglow) and outbuildings </div> <div data-bbox="761 965 1310 1252" data-label="Text"> <p>offer high to low potential (CSA Environmental, 2017) and the property in the south-west corner has not been assessed. These categories are based on external assessments only, therefore internal assessments would be required to confirm. Numerous trees within the Site offer roosting potential, including mature oaks with high potential towards the eastern end of the Site. Previous remote surveys did not record oaks within trees north of Fernlands. Local records fall over 1km from Site indicate the presence of common plebeian oak, sessile, brown long-earred oak, wildflower oak, Nuttall's oak and the rare bark-shed oak (Eichsteden's oak). Both the latter species favour woodland habitats, but could utilize the mature hedgerow trees particularly around the peripheries of the Site. Additionally foraging species (pipitrelle, warblers, meadow and flycatchers (Nectarial or Estivation sp)) have been recorded along a mature tree line within the east of the Site and it is considered that the network of hedgerows and wood-lined edges throughout the Site is likely to be of value for local bat species for both commuting and foraging.</p> <p>Birds – Hedgerows, scrub, trees, woodland and buildings within the Site provide suitable habitat for a variety of widespread birds to roost and forage, including priority species under the NERC Act 2006 and Birds of Conservation Concern (BOCC).</p> <p>Dormouse – There are records within 1km of the Site, including three Natural England dormouse mitigation licenses c.200m north-west, 2016 surveys of the southern part of the site did not record dormice, however given the age of data and small area surveyed it is recommended that suitable surveys are undertaken. Woodland, hedgerows and dense scrub provide suitable habitat for dormice and are connected to more extensive</p> <p>habitat beyond the Site boundary:</p> <ul style="list-style-type: none"> Great crested newt (GCN) – There are two Natural England GCN mitigation licenses c.80m south-west and there are slow records (Duffin 1996) from within 300m. There are at least two ponds within 250m of the Site, and a further three within 500m (including any north of the M23 motorway), but none within the Site itself. Should great crested newts be present in surrounding ponds, it is considered relatively unlikely that they would utilize the Site due to the relatively large dispersal distances between ponds, the presence of major roads acting as barriers to dispersal and the presence of suitable terrestrial habitat in closer proximity to off-site ponds. Invertebrates – Habitats on Site present opportunities for a broad range of common invertebrates with some suitable species possible such as brown hair-creek due to the presence of suckling blackthorn. Mature trees may also support notable dead-wood invertebrates. Riparian mammals – No records of water vole within 2km were returned as part of the data search to 2015. Possible evidence of burrows along the banks of the western watercourse suggest that water voles could be present, although the lack of emergent vegetation makes the Site sub-optimal. Other ranuncoid ditches were considered unsuitable due to low level of flowing water and isolation. No suitable habitat for otter is present. Reptiles – Suitable terrestrial habitat for common reptiles is present, particularly for common lizard and slow-worm. The dense tussocky sward structure and deep banks within the western fields, and likely within the un-surveyed central and eastern fields, combined with bordering scrub and </div> <div data-bbox="1400 957 1982 1268" data-label="Text"> <p>woodland, provide suitable refuge and invertebrate food resources.</p> <ul style="list-style-type: none"> Hedgehog – The fields, scrub, woodland and garden habitats on Site provide good habitat for hedgehog and records are present within the area. <p>Constraints and Opportunities</p> <p>This section seeks to identify where the presence of designated areas, habitats or other potential for protected or notable species to be present will be a material consideration for the LPA when considering future development proposals. It is based on the assumption that detailed further survey work would be completed to inform detailed design and accompany any future planning application for development of the Site (see Section 6).</p> <p>Designated Sites</p> <p>A screening assessment of Likely Significant Effects (LSEs) within the Draft HRA of the Crawley Local Plan (Lepros Consulting, 2021) indicates alone and in-combination effects of the Gatwick Green development on air quality, potentially impacting:</p> <ul style="list-style-type: none"> Ashdown Forest SAC and SPA; and Mole Gap to Reigate Escarpment SAC. <p>In addition, in relation to hydrology it may increase discharges to Wastewater Treatment Works or increase pressure on public water supply abstraction. The HRA predicts changes in water quality and water quantity at:</p> <ul style="list-style-type: none"> Mole Gap to Reigate Escarpment SAC; Arun Valley SPMN SAC/Ramsar; and The Marn SAC. <p>The HRA indicates that detailed air quality modeling, water quality and water quantity assessments are currently underway to further define impacts associated with increased traffic movements. It is anticipated that policy wording may require expanding to include sustainability measures, measures for water efficiency and protection of water quality to reduce impacts to negligible. Given the distances of these designations from the Site, it is anticipated that this will be achievable.</p> <p>Local Priorities/BAF Conservation Strategies</p> <p>Whilst the Biodiversity Opportunity Area which covers part of the Site receives no statutory protection, it indicates where there are opportunities to provide net gains for biodiversity and can be used to inform opportunities for habitat creation and restoration. In addition, BOAs are recognised within the Crawley Green Infrastructure SPD and for impacts which reduce, block or harm green infrastructure, the applicant should clearly explain why it can't be avoided and how they have been mitigated and/or compensated for.</p> <p>Development of this Site could therefore offer opportunities to contribute to the Crawley Woods BOA, ensuring that ecological (habitat) networks are maintained and enhanced. For example, the existing network of outgrown hedgerow/ tree-lines around the north and east of the Site could be expanded</p> </div>

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			<div data-bbox="757 319 1310 742" data-label="Text"> <p>and enhanced, linking to small blocks of woodland in the south-east corner north and west of the Site. The ecological network can be made functional, providing ecological benefits as well as creating an attractive setting for the development, providing space for recreation and encouraging sustainable travel (e.g. cycle routes).</p> <p>Habitats and Flora</p> <p>In order to be compliant with planning policy and protect features of ecological value the Mitigation Hierarchy needs to be applied during development of proposals. This is a set of principles which are followed in sequential order: avoidance, mitigation and, as a last resort, compensation.</p> <p>Habitats should form the basis of habitat retention where possible. At this Site, retention should therefore focus on:</p> <ul style="list-style-type: none"> Hedgerows; Woodland; and Mature trees. <p>These habitats, with suitable buffer zones could form wildlife networks as well as Green Infrastructure (GI) through the Site. As these habitats are mainly located around the Site perimeter and eastern areas, this offers good opportunities to do so with the BCA environment discussed above. A full survey of the Site will be required to identify the habitats outside the previously surveyed areas and identify their value.</p> <p>If ancient woodland is present, a minimum 15m buffer will be required between the development and the ancient woodland, including through the construction phase. A Comprehensive Arboricultural Survey should be undertaken prior to the detailed design stage.</p> <p>Unavailable losses of habitats will need to be adequately compensated for in accordance with national and local policy.</p> <p>New habitat creation should focus on areas with high biodiversity value. This could include new woodland and hedgerows, orchards, species-rich grassland and wildlife friendly SuDS schemes/wetlands (bearing in mind potential constraints relating to Gatwick Airport and land to fill).</p> <p>Orchards, including those adjacent to Site should be buffered and measures employed to prevent pollution.</p> <p>Protected and No-GO Zones</p> <p>Appropriate design opportunities and constraints relating to fauna will be based on up-to-date survey work for these species; however, a summary of possible design considerations is provided below.</p> <ul style="list-style-type: none"> As a preliminary assessment, hedgerows, trees and woodland edge may form important but, first and foremost, habitats. Mature trees may be important for suitable deadwood invertebrates. These habitats should be retained where possible. Retained and created habitat should be designed to provide connectivity across the landscape (e.g. north to south and east to west). <p>Conclusions</p> <p>In summary it is concluded that there are no in principle ecological constraints preventing allocation of this Site for future development. Furthermore:</p> <ul style="list-style-type: none"> The Site is unlikely to be constrained by the presence of statutory designated sites for nature conservation in the local area, subject to further assessment and possible mitigation; Habitat retention should focus on those features of highest ecological value, contributing to local conservation strategies/priorities where possible; Development should aim to retain and incorporate features for protected and notable species, including a network of wildlife corridors through and around the Site; Development proposals should ensure biodiversity net gain can be achieved; and Detailed design and any future planning applications should be informed by further ecological survey work. </div> <div data-bbox="1400 319 1971 742" data-label="Text"> <p>Wildlife corridors should be protected from light-spill. As a guide, a buffer of 10 - 15m between important habitat and built development is usually sufficient to mitigate light-spill. Buildings and suitable trees within the Site have the potential to support roosting bats and will require an assessment to determine presence/likely absence. If roosts are found, retention of the roost or a shelter for the replacement roosts will be required (in accordance with the conditions of a suitable Natural England EPS derogation licence).</p> <p>If reptiles are found to be present, GI can be designed to act as a 'receptor area' for populations found within the built area. The habitat within GI can be enhanced through the creation of sunexposed grassland, sunny banks and habitat piles for refuge.</p> <p>Planting schemes should incorporate plants that support invertebrates. There are opportunities to support the West Sussex Pollinator Action Plan 2017 - 2022 by protecting and enhancing important pollinator habitat (e.g. trees and hedgerows) and creating pollinator-friendly environments as part of GI. To include native plants or those listed on BVS Plans for Pollinators, habitat piles, structurally diverse habitats and reduced cutting regimes via long term management principles;</p> <p>Include integrated or surface mounted boxes for bats, birds and invertebrates on new buildings;</p> <p>Given the proximity to Gatwick Airport consideration will need to be given to bird species that could be attracted to new buildings (such as gulls which nest on flat roofs) and appropriate mitigation/management designed in:</p> <ul style="list-style-type: none"> The presence of badger setts on the Site (to be confirmed within unsurveyed areas) will require minimum 20m buffers in which no construction/excavation occurs. If present, adequate wildlife corridors and foraging habitat will need to be provided. These spaces can form part of landscaping/open space/green infrastructure. It may be possible to close setts if required, although new artificial setts may be required (e.g. for main breeding setts) A planning application is likely to require a Landscape and Ecology Management Plan (LEMP) and Construction Environmental Management Plan (CEMP) prior to works/occupation. <p>Biodiversity Net Gain</p> <p>There is already policy requirement to enhance nature conservation and the Government are planning to roll out a legislative requirement for achieving a net gain in biodiversity for all developments. This gain relates to both linear habitats (e.g. hedgerows) and non-linear habitats (e.g. grassland/woodland) and requires the use of a 'metric' to calculate the required biodiversity units.</p> <p>It is important that BNG is considered early in the design stage to ensure that proposals can meet this requirement.</p> <p>High diversity/complex habitats (woodland, mature trees, hedgerows) should be favoured for retention as opposed to low diversity habitats (hard standing and improved grassland), which are easier to replace. New habitat</p> </div> <div data-bbox="757 853 1310 1276" data-label="Text"> <p>creation should focus on those with high biodiversity value, for example wetlands, ponds, meadows and orchards.</p> </div> <div data-bbox="1400 853 1971 1276" data-label="Text"> <p>Transport</p> <p>Miss White Transport (MWT) have been appointed to provide traffic and transportation advice in relation to the proposed development of land close to Gatwick Airport between Crawley and Horley in West Sussex. MWT have formulated a proposed Transport Strategy that will enable the site to be developed as part of the adjacent Gatwick Green Strategic Employment location.</p> <p>Local Highway Network</p> <p>The wider Gatwick Green site area, within which the Ferlands site sits, is located east of the E2036 Balcombe Road and west of Peaks Brook Lane. The site area is bounded to the north by the A23 Spur and the south by the B2037 Antlands Lane.</p> <p>The B2036 Balcombe Road provides a broad north-south link between the A23 to the north of Horley town centre and Balcombe to the south, and beyond as London Road/Brook Street to the A272 close to Cuckfield.</p> <p>In the vicinity of the Ferlands site, Balcombe Road is a single carriageway road and is subject to the national speed limit (50mph). The speed limit decreases to 40mph approximately 400m south and 450m north of the site frontage.</p> <p>Balcombe Road is unlit and provides a footway on the western side of the road only in the vicinity of the site.</p> <p>Traffic Volumes</p> <p>Traffic survey information was collected for the Transport Assessment (TA) prepared by PJA to support the road withdrawal planning application at the former Ferlands Nursery site located north of Ferringhill Road (CR/2017/0610/TA1).</p> <p>This data was collected in December 2015 and January 2016 and includes an Automatic Traffic Count (ATC) on Balcombe Road, a turning count at the Balcombe Road/Ferringhill Road junction and a speed survey on Balcombe Road.</p> <p>The recorded vehicle speeds on Balcombe Road in the vicinity of the Ferlands site were well below the existing 50mph speed limit.</p> <p>Road Safety</p> <p>'Crashmap' data identifies that 4 personal injury accidents have occurred on Balcombe Road in the vicinity of the Ferlands site during the most recent five-year period where data is available (2016 to 2020).</p> <p>Overall, this section of Balcombe Road has a relatively good safety record.</p> <p>Public Transport</p> <p>Bus stops are located and operate on Balcombe Road to the north of the site and on Antlands Road to the south of the site. These bus stops provide different opportunities to travel to a range of destinations including Horley.</p> </div>

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			<p>Gatwick Green Section 9</p> <p>Crawley, Regate and Redhill.</p> <p>However, whilst there are bus services which operate within the local area, the existing level of local bus infrastructure is extremely poor due to limited development in the immediate vicinity of the proposed site.</p> <p>The site is located within the vicinity of three local railway stations, with the closest being Gatwick Airport to the west. Horley Railway Station is located to the north, whilst Three Bridges Railway Station is located to the south.</p> <p>As identified within the Local Plan supporting evidence, station improvements at Crawley and Three Bridges Station are already identified within the Crawley Growth Programme, whilst Gatwick Airport Station is to be significantly improved, and upgraded alongside improved access to local railway bus services. The identified improvements will enhance those transport interchanges and help achieve modal shift away from the private car.</p> <p>Gatwick Airport station is located some 1.7km from the centre of the site and provides an opportunity to travel to key destinations including London Victoria, Brighton, Heathrow, Cambridge, Peterborough and Reading.</p> <p>Walking and Cycling</p> <p>The site is well located to the existing central of Crawley and its northern suburbs, east of Horley, the emerging residential area such as Forge Wood, and complementary employment areas of Manor Royal and Gatwick Airport. It is generally accepted that walking offers the potential to substitute motor car journeys in particular those that are less than 2.5 kilometres. The location of existing and proposed potential north-south and east-west services and facilities for visitors to a proposed site is therefore of key consideration.</p> <p>All of Horley, Gatwick Airport and the northeastern parts of Crawley are well within the 15-min cycling distance widely considered to be appropriate to encourage day-to-day use and can be easily reached by bicycle. Cycling is therefore considered to be a viable travel choice for future employees at the site.</p> <p>All three railway stations referred to earlier are within a 10 to 20 minute bicycle ride, allowing cycling a feasible option as part of a multi-modal journey when travelling from the wider area.</p> <p>Summary</p> <p>Therefore, it is evident that the proposed Gatwick site is accessible by non-car modes of travel including walking, cycling, bus and train.</p> <p>GATWICK GREEN</p> <p>TWG covers 48ha of land east of Gatwick Airport and south of the M23 main road between junctions 9 and 10. This forms part of a large strategic S10a which is being provided by TWG for employment.</p> <p>TWG is opposed to being forward an integrated site development with on-site infrastructure solutions to address the site which currently forms part of the land that is proposed to be allocated as a Strategic Employment Location under Policy EC4 in the CLP.</p> <p>page 11</p> <p>Gatwick Green Section 9</p> <p>Strategic consider that the modelling is sufficiently robust to be representative of impacts to 2037, the end of the sixth Local Plan period. The quantum of development is robust in that it is consistent with the Local Plan period to 2037.</p> <p>The Crawley SATURN Transport Model, which has a base year of 2015, has been used to undertake the transport modelling. The Local Plan development for each scenario has been added on top of the Reference Case and the resultant demands assigned to a future Crawley network of Crawley that included committed schemes.</p> <p>By comparing the performance of the network with the Local Plan scenarios in place against the Reference Case, overcapacity junctions potentially requiring mitigation were identified.</p> <p>The emphasis has been to consider sustainable mitigation to support the CLP's overall Local Plan rather than purely highway capacity mitigation.</p> <p>The emphasis areas from physical mitigation, east to a shift towards managing demand by prioritising sustainable travel including encouraging the potential that virtual mobility will increasingly play alongside active modes, walking and cycling, public transport, rail and buses and in sharing and better help in tackling the Climate Change emergency.</p> <p>If the 14,790 sqm is split into the three land use identified in the CTS and in the same proportions, this equates to the following additional floor space potentially being provided in the Gatwick Green Missing Section site:</p> <p>page 14</p> <p>Gatwick Green Section 9</p> <p>Fig 20 proposed access arrangements onto Balcombe Road</p> <p>• B8 Parcels 1,478 sqm • B8 Warehouse 6,666 sqm • B2 Industrial Estate 4,434 sqm</p> <p>Prior to the CTS being published, MWT undertook an assessment of the access requirements of the Gatwick Green Missing Section site using a similar origin and proportion of employment land use as TWG proposed for the wider Gatwick Green area. This approach resulted in the site providing circa 46,290 sqm of floor space, which was split as per the TWG TS.</p> <p>• B8 uses 27,960 sqm • B1 uses 9,165 sqm • C1 uses 9,165 sqm</p> <p>The approach taken therefore provides an extremely robust assessment as if the proposed access arrangements can cater for the high level of development assessed then it will be more than capable of accommodating the lower level of trips associated with a lower level.</p> <p>page 15</p> <p>Wholesale Access</p> <p>The 'Gatwick Green Missing Section' site is proposed to be accessed from a new traffic signal controlled junction on Balcombe Road approximately 150m north of Farnhill Road.</p> <p>The proposed signal controlled junction would provide two lanes on Balcombe Road on the approaches to the junction and accords with highway design guidance for the approach roads on this part of Balcombe Road.</p> <p>The provision of a new signal controlled junction in this location will help reduce vehicle queues (especially in conjunction with a Traffic Regulation Order to formally reduce the speed limit) and improve road safety on this part of Balcombe Road.</p> <p>Pedestrians and Cyclists</p> <p>New footway and cycleway infrastructure and facilities will be provided as part of the development of the site that will work in conjunction with existing links to the existing transport network and also to the wider Gatwick Green site area.</p> <p>Tripartite</p> <p>The potential number of trips predicted to be generated by the assumed composition of the Gatwick Green Missing Section site has been calculated using the TRICS trip rate database for up to 46,290 sqm of floor space.</p> <p>The TRICS database has been interrogated to identify the likely vehicle mix generation associated with B1, B8 and C1 uses in a similar location to the site. The TRICS category Business Park best relates to the B1 (New E Class) uses that were proposed on the TWG site.</p> <p>The assessed level of development on the 'Gatwick Green Missing Section' site will generate 277 and 238 vehicle movements in the morning and evening peak hours respectively.</p> <p>These additional trips have been assigned onto Balcombe Road assuming a distribution of 70% of trips from the north and 30% from the south.</p> <p>Junction Capacity Analysis</p> <p>The proposed signal controlled access junction has been assessed using the LINSIG computer program, which is the industry standard tool used to assess the operational performance of traffic signal controlled junctions.</p> <p>The proposed junction has been assessed in 2026, i.e. five years into the future, in the morning and evening peak hours with the trips associated with the development of the Gatwick Green Missing Section' site added.</p> <p>Tripartite growth has been calculated using TEMPRO Version 7.2 adjusted regional and local traffic growth forecasts based on National Traffic Model (NTM) AF 15.5 datasets using the Origin and Destination Trip and Type. The FIA TA contains 2022 traffic volumes, which were acceptable to West Sussex County Council (WSCC) and so these have been used as the base traffic flows upon which traffic growth has been added.</p> <p>No specific committed development traffic has been added to the TEMPRO</p> <p>page 16</p>

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Site layout plan for the development will include cycle routes associated with future development in the local area. It is expected that the allocation for employment use to the Employer and Transport Development Management Plan under H2018 (Active Travel) Part 10 (adjacent to Junction 16, north of the A23) will only have been accessed via the proposed road. This is consistent with the proposed Local Plan which states that the proposed road junction can only be used for emergency services, public transport, or the sustainable transport modes such as limited number of additional vehicles for employees.

The proposed site access will operate and will be capable with several other access points in the 2021 design plan with the application of advanced signal work of 20% associated with the Gatwick Green Missing Sector site. The maximum Degree of Saturation (DOS) for multiple signal controlled junctions is normally taken as 90%. The proposed junction operates with a maximum DOS of just over 80%, which demonstrates that there is spare capacity on this junction with significant spare development on the junction (as required by the employment land allocation).

Green High Level Open Capacity (the 'Green High Level Open Capacity' site access) junction could be used to provide an additional access to the TWG site, if desired.

Integration with Greater Gatwick Green Corridor

The proposed access to the Gatwick Green Missing Sector (via road) outside one of the additional access points that TWG are considering. The potential access could either be the Gatwick Green Missing Sector site could.

Link directly into the TWG (and/or reverse) via the north-south route to access the site from the TWG development (transport).

Such an approach would facilitate the development and sustainable transport infrastructure of Gatwick Green to be provided in a comprehensive manner as suggested by TWG and identified in the TP.

Mobility Strategy

A package of travel planning measures and initiatives will be formulated to reduce the need to travel using the private car (single occupancy trips) and maximise travel by sustainable modes of transport.

This could include the following:

- Provision of a Mobility Station/Hub to integrate the various forms of transport proposed to/from within the site and provide "first and last mile solutions" to connect communities to frequent public transport services.
- Provision of hire schemes (electric bikes, pedal cycle, e-scooter, e-cargo bike etc).
- Electric car club and car sharing scheme.
- Dynamic Demand Responsive Transport (DDRT) using advanced and real time requests (dial-a-ride, shared taxis).
- Use of new mobility technology (e.g. Mobility as a Service - MaaS - platform).

These travel planning measures would be formulated in conjunction with others (TWG, Crawley Borough Council, West Sussex County Council etc) to ensure they fully align with the desired mobility strategy for the wider Gatwick Green area.

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Hydrology

PHG Consulting Engineers have reviewed the available information to assess the hydrology in the area of the proposed development site. It has been considered that there is a very low risk of fluvial flooding and the low risk of surface water flooding can be reduced with the introduction of site-specific passive drainage.

An existing drainage ditch is shown on online mapping flowing east to west along the northern boundary of the site. Due to the topography of the site any ground level runoff from the development will flow to this existing ditch. Available Lidar data has been reviewed to determine the topography of the site and fall arrows indicate that further smaller ditches may be present on site, a detailed topographical survey will be required to determine where any existing drainage ditches flow. The drainage ditch system also runs along the eastern boundary of Balcombe Road and is culverted under the existing private access, any future crossing of this ditch would require a new culvert and Ordinary Watercourse Consent.

Flood Risk

Flood maps available at Gov.UK have been reviewed to determine the risk of flooding from various sources within the site. Figure 32 below shows the extent of fluvial flooding from rivers and shows the development site to be away from the extent of fluvial flooding.

Flood maps also show the risk of surface water flooding within an area, at the development site there is a large area at 'low' risk of surface water flooding as shown in Figure 33. Areas of low flood risk have a likelihood

of flooding between 0.1% and 1%. The depth of surface water flooding in this area ranges between 0-300mm and 300mm-900mm as shown in Figure 34. The velocities of this are generally below 0.25m/s (Figure 35) and therefore are not deemed to pose a major hazard.

Flooding from surface water can be difficult to forecast due to small differences in rainfall intensity and volumes, local features can also affect the likelihood and severity of flooding. Surface water flooding within the site is mainly contained in the low lying area at the north western corner.

Surface water runoff from the greenfield will add to any surface water flooding shown on the below maps. Therefore, the development of the site can reduce the extent of surface water flooding by reducing rates and volumes of runoff to this area. Given the likelihood of surface water flooding is minimal and anticipated depths are low, the overall risk of surface water flooding post development will be negligible. The proposed drainage strategy should reduce flow rates and volumes and make space for water.

Reservoir Flooding

Part of the northern section of the site is within the extent of reservoir flooding with maximum depths between 300mm-1m. Generally, reservoir flood risk maps are produced to inform reservoir owners and help produce excavations and early warning signs. The likelihood of reservoir flooding is considered to be minimal and should not affect the use of land.

Fig 32 surface water depth from www.gov.uk



should be designed to accommodate flow up to and including the 1 in 100 year with a 60% increase for climate change. To ensure effectiveness can be managed, a minimum freeboard of 300mm should be included. Given the above parameters, a 1.5m deep basin with 1 in 3 banks covering a surface area of approximately 5,670m² and providing 4,500m³ storage would be required. For the SuDS techniques such as porous surfaces can be utilised to reduce the overall size of surface water attenuation required.

Foul Water Drainage

Sewer records have been obtained from Thames Water and show four existing foul sewers with the vicinity of the development. The development is surrounded by greenfield, Gatwick Airport and some smaller developments/ dwellings. The dwellings in the vicinity of the site are likely to have individual

Fig 34 surface water flood velocity from www.gov.uk



treatment plants and Gatwick Airport would be served by a private drainage system. The nearest Public Sewers are located approximately 600m south of the development in Balcombe Road. Sewer records show that the existing mainline (780) at the start of the run has an invert level of 27.25m and the public sewer discharges to a pumping station. The pumping station is assumed to have a direct discharge to Crawley Sewerage Treatment Works located 200m to the west. Over the site, and the lowest level existing mainline, a pumping station will be required to discharge to the Thames Water network. The pumping station would also include an oblique rising main being laid in Balcombe Road, approximately 500m long. Once the development is built and users are determined early discussion should take place with Thames Water to ensure sufficient capacity within the existing network.

Gatwick Green | Suedas

Fig 31 fluvial extent from www.gov.uk



Historic Flooding

The West Sussex SFRA provides an outline of historical flood events, however this information is limited and, in many cases, does not include the type of flooding. There are no known flood events within the site.

Groundwater Flooding

The West Sussex SFRA shows the geology of West Sussex and shows the site to be in an area underlain by Clays. Therefore, groundwater flooding may occur from perched water flowing above more impermeable soils. A site-specific site investigation will be required and this should determine whether groundwater is encountered during works.

Fig 32 Surface water Flood extent from www.gov.uk



Surface Water Drains

The surface water drainage strategy for the site should restrict discharge to the calculated QBAR greenfield runoff rate, this would ensure that during rainfall events greater than the predicted 1 in 2 year event discharge from the site post development would be reduced. Based on the site area consisting of 60% impermeable surfacing the QBAR greenfield runoff rate has been calculated to be 28 AL/s. To maximise the benefits of a SuDS approach to surface water management, the use of swales to convey water should be considered and the final attenuation should be provided in a landscaped basin (or basins). This will ensure the surface water drainage network provides amenity and biodiversity benefits while reducing the volume and rates of runoff. The masterplan should show space within landscaped areas for attenuation basins to be provided. Any attenuation feature within the site

Water Neutrality

Quantum CE have prepared a strategy to demonstrate how the proposal can achieve water neutrality and potentially contribute towards the wider solution in Crawley Borough.

Whilst the site itself is outside of the Water Neutrality zone, it is considered best practice to seek to achieve low water use and if possible contribute towards the wider solution.

Accordingly, it is noted in the first instance that the proposed mining section of Gatwick Green will utilise greywater recycling in order to drastically reduce the amount of potable water demand. This intervention results in the new water demand associated with the proposed B8 development site being 40% less than that of the proposed eight industrial units.

The report prepared by Quantum CE also demonstrates that it is viable to support 14,780 m² of industrial floor space, based on the consumption of a typical Final Mile Distribution Centre employing 211 full-time members of staff with an average water demand of 70,550 litres per day. Through the use of water neutrality principles, this water demand can be reduced to 4,330 litres per day, by installing greywater recycling technology. Initial well yield tests have indicated that potentially there may be additional yield capacity than the initial 6,000 litres per day that has currently been confirmed on site. It can therefore be concluded that the requirements for water neutrality at the proposed site for allocation are met. Thus, clearly demonstrating the developing/allocating of the site would facilitate a much more sustainable development on this much-




needed employment site.

Additional well testing together with a detailed hydro-geological program will be undertaken in order to ascertain the maximum well yield that could be available to the site. It is also noted that the historic demand for the site was at 130,330 litres per day associated with the horticultural water demand of the site, which would suggest that potentially there may be additional yield capacity than the initial 6,000 litres per day that has currently been confirmed on site.


The annual rainfall figures for the area is 25,644,390 litres/year. Whilst the current yield of 6,000 litres/day results in an annual yield of 2,070,000 litres/year. However, the annual water consumption from the well for these crops would have been approximately 77,650,000 litres/year (25,000,000 x 3.1). This would result in a significant deficit of 51,865,610 litres/year. Most of which is considered to have been historically supplied by the well, which is currently impeded by detritus, heavy silt and the presence of organic matter.

Quantum CE consider that it can be reasonably concluded that there is sound ground to expect much greater yields which could be made available to service the allocated Gatwick Green employment site, together with some other off-site opportunities that may need water off-take credits.

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			<div style="display: flex; flex-direction: column; align-items: center;"> <div style="display: flex; justify-content: space-between; width: 100%; font-size: 8px; margin-bottom: 5px;"> Gatwick Green Section 5 </div> <div style="display: flex; justify-content: space-around; width: 100%;"> <div style="text-align: center;">  <p style="font-size: 8px; margin-top: 5px;">Fig 25: existing well on site</p> </div> <div style="width: 60%; padding: 10px;"> <p style="font-size: 8px; margin-bottom: 5px;">page 61</p> </div> <div style="text-align: center;">  </div> </div> <div style="display: flex; justify-content: space-between; width: 100%; font-size: 8px; margin-top: 20px;"> Gatwick Green Section 6 </div> <div style="display: flex; justify-content: space-around; width: 100%;"> <div style="text-align: center;">  </div> <div style="width: 60%; padding: 10px;"> <h2 style="font-size: 48px; color: #4CAF50; margin: 0;">6</h2> <h3 style="font-size: 24px; color: #4CAF50; margin: 0;">Conclusion</h3> <p style="font-size: 10px; margin-top: 5px;">6.1 Introduction</p> <p style="font-size: 8px; margin-top: 5px;">This document has been prepared by IRM Planning on behalf of WT Lamb, the Dye family and Elliott Metcalfe The Simmonds family and sets out how their combined landholdings can contribute towards the Gatwick Green proposals.</p> <p style="font-size: 8px; margin-top: 5px;">Between them, our clients own 5.8ha of land that in effect form the missing section of the Gatwick Green proposals. Our clients consider that there is an opportunity to plan comprehensively for the entire Gatwick Green area not just elements of it thereby assisting the local economy to transition from the previous reliance upon airport related activities and diversify the economic base in accordance with emerging trends and requirements. In this regard they would be committed to working in partnership with TWG and Council in order to deliver the vision for the strategic site and contribute towards needs.</p> <p style="font-size: 8px; margin-top: 5px;">Our clients land forms a vital missing section of the allocation that forms the central and focal parts of the area with an opportunity for an access at the very heart of the site and to create a truly unique employment area.</p> <p style="font-size: 8px; margin-top: 5px;">Together with the existing 48ha within the ownership of the Wilks Group our clients land provides a significant opportunity to provide a comprehensive approach to the future of Gatwick Green for employment purposes.</p> <p style="font-size: 8px; margin-top: 5px;">page 63</p> </div> <div style="text-align: center;">  </div> </div> <div style="text-align: right; font-size: 8px; margin-top: 10px;"> <p>T: 02920 349 737 e: info@irmplanning.com www.irmplanning.com Newwood Court, Brookers Road, Dillinghurst, RH14 9EJ</p> </div> </div>

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			<p>Appendix 4. Transport Note Prepared by Miles White Transport</p> <p>Appendix 5. Ecology Note Prepared by GE</p>  <p>Fernlands, Gatwick Green, Fernhill Road, West Sussex</p> <p>Technical Note - Ecology</p> <p>June 2023</p> <p>A report on behalf of Jonathan Lamb</p> <p>Ref: 1282-ETN-FM</p> <p>www.ge-consulting.co.uk - 01647 203652 - info@ge-consulting.co.uk</p> <p><small>GE Consulting is a trading name for GE Consulting Services (UK) Ltd registered number 01425535 Registered office: Unit 11A, Galleys Meadow Business Park, Chrostow, Devon, EX2 7QB. VAT number 160659902</small></p>

Jonathan Lamb
Fernlands, Gatwick Green, Fernhill Road, West Sussex



Site Details

Site Name	Fernlands
Site Location	Gatwick Green, Fernhill Road, West Sussex
Central OS Grid Reference	TQ 206 413
Client	Jonathan Lamb

Quality Assurance

Report Title	Technical Note - Ecology
Report Reference	1282-ETN-FM
Author	Faye Midmore BSc MSc MCIEM
Checked By	Richard Pash BSc MCIEM
Approved By	Richard Pash BSc MCIEM
Revision No.	FINAL
Issue Date	13 June 2023
Summary of Changes	N/A
Revised By	N/A
Approved By	N/A

The content of this report that has been provided by GE Consulting is true, and has been prepared and submitted in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. Its contents are compliant with British Standard BS42020: 2013 Biodiversity Code of Practice for Planning and Development.


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			<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>Jonathan Lamb Femlands, Gatwick Green, Fernhill Road, West Sussex</p> <p>Contents</p> <p>1 Introduction1</p> <p>2 Scope and Aims1</p> <p>3 Methods1</p> <p>3.1 Desk Study and Previous Surveys1</p> <p>3.2 Limitations2</p> <p>4 Baseline Conditions2</p> <p>4.1 Statutory Designated Sites2</p> <p>4.2 Non-statutory Sites2</p> <p>4.3 Local Priorities/ BAP/ Conservation Strategies3</p> <p>4.4 Habitats & Flora4</p> <p>4.5 Protected and Notable Fauna4</p> <p>5 Constraints and Design Opportunities6</p> <p>5.1 Designated Sites6</p> <p>5.2 Local Priorities/ BAP/ Conservation Strategies6</p> <p>5.3 Habitats and Flora6</p> <p>5.4 Protected and Notable Fauna7</p> <p>6 Biodiversity Net Gain8</p> <p>7 Further Survey Work8</p> <p>8 Conclusions8</p> <p>9 References10</p> <p>Figures</p> <p>1: Ecology Technical Note Plan</p> <p>Appendices</p> <p>Appendix 1 – General Glossary of Terms 12</p> <p>Appendix 2 – Planning Policy and Legislation 13</p> <p>Appendix 3 – Designated Sites in Crawley (extract from current Local Plan) 14</p> <p>Appendix 4 – Habitats of Principal Importance in Relation to Site (MAGIC map) 15</p> </div> <div style="width: 45%; text-align: right;">  <p>Jonathan Lamb Femlands, Gatwick Green, Fernhill Road, West Sussex</p> <p>1 INTRODUCTION</p> <p>GEC Consulting has been commissioned by Jonathan Lamb to prepare this Ecology Technical Note to accompany representations to the draft local plan consultation in relation to land at Femlands, Gatwick Green, Fernhill Road, West Sussex (central OS grid reference: TQ 296 413) hereafter referred to as the 'Site'.</p> <p>The purpose of the report is to determine the ecological constraints and to assess the suitability of the Site for allocation within the emerging Local Plan for future employment development.</p> <p>The area within the application boundary is hereafter referred to as the 'Site'.</p> <p>2 SCOPE AND AIMS</p> <p>The aims of this report are to:</p> <ul style="list-style-type: none"> • Draw together previous ecological survey work and provide an overview of baseline conditions; • Evaluate the requirements of a proposal in terms of biodiversity planning policy and legislation; • Review initial constraints and opportunities for the Site and propose likely mitigation measures/ design considerations; and • Detail further ecological survey work required to inform detailed proposals and a future planning application. <p>3 METHODS</p> <p>3.1 Desk Study and Previous Surveys</p> <p>A Preliminary Ecological Appraisal (PEA) and Ecological Impact Assessment (EiA) have been undertaken which form the basis of this technical note. This work comprises:</p> <ul style="list-style-type: none"> • A PEA of land east of Balcombe Road (The Ecology Co-op, 2020) covering three western fields and two buildings. This work comprised an online desk-based study and walkover survey, including a high-level, external preliminary bat roost assessment of buildings and trees. • An EiA of the Former Femlands Nursery (CSA Environmental, 2017) covering a field, property and woodland north of Fernhill Road. This work included a desk-based study comprising internet searches and data from Sussex Biological Records Centre (SxBRC) and Surrey Biodiversity Information Centre (SBIC) in November 2015. A Phase 1 Habitat Survey was undertaken in 2015, a domestic presence/absence survey and an emergence/ re-entry survey of trees with bat roost potential in 2016. <p>An updated desk-based internet study has been undertaken in March 2021 including:</p> <ul style="list-style-type: none"> • A search of the government environmental mapping tool MAGIC¹ for statutory sites within 2km, European sites within 10km, Priority Habitats and European Protected Species (EPS) licences issued by Natural England within 2km of the Site and the National Habitat Network within the Site; • A review of aerial imagery and OS maps to identify possible important habitat features; • A search of Natural England Open Data Geoportal for records of great crested newt eDNA² in ponds within 1km of the Site; <p>¹ www.magic.gov.uk ² https://data.naturalengland.org.uk/data-portal/records/great-crested-newt-eDNA/surveys/0/d1817d1e-13e0-4a7c-8000-000000000000 https://www.gov.uk/guidance/using-natural-england-open-data-geoportal</p> <p>Technical Note - Ecology 1292-ETN-PM</p> <p>1</p> <p>13 June 2022</p> </div> </div>

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Therefore, whilst care has been taken to ensure that balanced advice is provided based on the information available, the possibility of important ecological features being missed cannot be ruled out (e.g. due to survey timings, changes in conditions, absence during surveys or the year of survey). The lack of evidence or records of protected species documented within this report does not preclude their presence from Site.</p> <p>The survey work undertaken above does not cover all areas of the Site; it excludes a field north of Elliott Metals (central grid reference TQ 296 412) along with a property and field at the eastern edge of the Site (central grid reference TQ 298 413) (see Figure 1). Whilst assumptions can be made based on survey work of adjacent land, no ground-truthing or protected species surveys have been undertaken within these areas.</p> <p>4 BASELINE CONDITIONS</p> <p>4.1 Statutory Designated Sites</p> <p>There are no National Site Network sites, which includes SACs and SPAs, within 10km. However, a Draft Habitat Regulations Assessment⁵ of the Draft Crawley Borough Council Local Plan (Lepus Consulting, January 2021) has screened in specific impacts relating to development at Gatwick Green on:</p> <ul style="list-style-type: none"> Mole Gap to Reigate Escarpment SAC, 11.3km north-west Ashdown Forest SAC/ SPA, 12.5km south-east; The Mens SAC, 30km south-west; and Arun Valley SAC/ SPA/ Ramsar, 33km south-west. <p>There are no statutory sites (such as SSSIs or LNRs) within 2km of the Site. Furthermore, the Site does not lie within any Natural England SSSI Impact Risk Zone (IRZs) for residential or commercial/ industrial development.</p> <p>4.2 Non-statutory Sites</p> <p>There are two non-statutory sites of County importance located within 1km:</p> <ul style="list-style-type: none"> Horleyland Wood Local Wildlife Site (LWS), 0.8km south-west, important for ancient coppice-with-standards bluebell woodland; and The Roughs LWS, 0.9km north-east, important for ancient semi-natural woodland and locally rare fine-leaved water-dropwort. <p> <small>³ http://sussexlmp.org.uk/</small> <small>⁴ https://www3.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/SPD00%20Sussex%20Biodiversity%20Op%20Areas.pdf</small> <small>⁵ https://crawley.gov.uk/sites/default/files/documents/PU/23587.pdf</small> <small>⁶ https://crawley.gov.uk/sites/default/files/2021-01/11/local_plan_mae_january_2021.pdf</small> </p> </div> <div style="width: 48%;"> <p>Jonathan Lamb Fernlands, Gatwick Green, Fernhill Road, West Sussex</p>  <p>4.3 Local Priorities/ BAP/ Conservation Strategies</p> <p>4.3.1 Biodiversity Opportunity Areas</p> <p>Biodiversity Opportunity Areas (BOAs) are landscape scale areas which have been identified as supporting high concentrations of Habitats and Species of Principal Importance⁷ (HPI/ SPI) and/or have the potential/ greatest opportunities for restoration and creation of habitats. They seek to expand, link and buffer important biodiversity sites to provide an ecological network.</p> <p>The Gatwick Wood BOA⁸ lies partially within the Site boundary, excluding the southern and western fields (see Figure 1 and Appendix 3). This area is described within the Crawley Green Infrastructure SPD (2016) as:</p> <p><i>"dominated by the Gatwick Airport landscape but contains a small amount of ancient woodland amongst agricultural land where the opportunities for biodiversity gain and landowner liaison are tangible.</i></p> <ul style="list-style-type: none"> Woodland management and restoration; Education and community engagement, including links to health; Increased site designation; Working with and attracting new businesses; Ecological networks; Visitor facilities." <p>4.3.2 Natural England National Habitat Network</p> <p>Natural England have developed an England-wide dataset of zones where action may be undertaken to build greater ecological resilience. These zones are based around existing HPIs, or 'primary habitats' and comprise:</p> <ul style="list-style-type: none"> Network Zone 1: land within close proximity to the primary habitat what are more likely to be suitable for creation of the same habitat type. Network Zone 2: land within close proximity to the primary habitat that are unlikely to be suitable for creation of the primary habitat, but where other types of habitat may be created or green infrastructure delivered. Fragmentation Action Zone: land immediately adjoining primary habitat patches that are small or have excessive edge to area ratio where habitat creation is likely to help reduce the effects of habitat fragmentation. Network Expansion Zone: land within relatively close proximity to Zones 1 & 2 identified as possible locations for connecting and linking up networks across a landscape. <p>The Site does not lie within any National Habitat Network zones.</p> <p> <small>⁷ In England, listed under Section 41 of the NERC Act 2006</small> <small>⁸ https://crawley.gov.uk/sites/default/files/2021-01-11/local_plan_mae_january_2021.pdf</small> </p> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div data-bbox="750 1093 1008 1125"> <p>Technical Note - Ecology 1282-ETN-FM</p> </div> <div data-bbox="996 1093 1019 1109"> <p>2</p> </div> <div data-bbox="1198 1093 1265 1109"> <p>13 June 2023</p> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div data-bbox="1489 1077 1612 1109"> <p>Technical Note - Ecology 1282-ETN-FM</p> </div> <div data-bbox="1736 1077 1758 1093"> <p>3</p> </div> <div data-bbox="1937 1077 2004 1093"> <p>13 June 2023</p> </div> </div>

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A central field, not surveyed as part of previous work, appears to comprise rough grassland and scattered trees, possibly a former orchard. Seasonally wet ditches are present including along the northern, southern and western boundaries of the Site.</p> <p>Two residential properties are present, 'Hunters Lodge' along the eastern boundary accessible from Balcombe Road and 'Femlands' along southern boundary accessible from Fernhill Road, along with associated outbuildings. Gardens comprised ornamental planting, scattered ornamental and coniferous trees and regularly mown, species-poor lawns. A further property, 'Flight House' is found to the east of Femlands in an area of unsurveyed land. It is surrounded by car parking, amenity grassland and semi-mature trees.</p> <p>During previous survey work, the field north of Femlands bungalow has been cleared and comprised bare, disturbed soil with limited areas of poor semi-improved grassland following clearance of waste and former glasshouses (CSA Environmental, 2017). Aerial imagery suggests this previously comprised a mosaic of grassland, trees and scattered scrub and is now likely to comprise grassland habitat. Similarly, the eastern field (mapped as woodland on MAGIC) appears to have been felled since 2015 as indicated on historical imagery, however mature boundaries have been retained.</p> <p>The field boundaries are marked by species-poor hedgerows, many with banks, dominated by blackthorn and hawthorn with occasional standard trees. Some of the inner boundaries of the Site are marked by mature tree lines, scrub, fences or walls. North of Femlands is a line of mature oak and ash trees.</p> <p>Broadleaved woodland is present to the east of Femlands, comprising mostly immature/semi-mature oak and silver birch, with occasional ash, hazel, holly and conifer species.</p> <p>In terms of value, hedgerows (and their associated trees) and broadleaved woodland are Habitats of Principal Importance listed on Section 41 of the NERC Act 2006.</p> <p>4.4.3 Flora</p> <p>Previous survey work has not identified any notable or invasive plants within the Site.</p> <p>4.5 Protected and Notable Fauna</p> <p>Based on the desk-based study and walkover surveys, the following protected and notable faunal species were considered to be present/ have potential to be present:</p> </div> <div style="width: 48%;"> <p>Jonathan Lamb Femlands, Gatwick Green, Fernhill Road, West Sussex</p>  <ul style="list-style-type: none"> Badger – no setts found however footprints and dead badger recorded at Balcombe Road in 2020 indicates local presence. There may be setts in unsurveyed parts of the Site and the fields offer foraging potential. Bats – A residential bungalow (Hunters Lodge) and agricultural barn off Balcombe Road provide moderate and low potential for roosting bats respectively (The Ecology Co-op, 2020). Femlands bungalow and outbuildings offer negligible/ low potential (CSA Environmental, 2017) and the property in the south-east corner has not been assessed. These categories are based on external assessments only, therefore internal assessments would be required to confirm. Numerous trees within the Site offer roosting potential, including mature oaks with high potential towards the eastern end of the Site. Previous emergence surveys did not record roosts within trees north of Femlands. Local records (all over 1km from Site) indicate the presence of common pipistrelle, noctule, brown long-eared bat, whiskered bat, Natterer's bat and the rare barbastelle and Bechstein's bat. Both the latter species favour woodland habitats, but could utilise the mature hedge/ tree lines particularly around the peripheries of the Site. Additionally, foraging soprano pipistrelle, serotine, myotis and big bats (<i>Myotis</i> or <i>Eptesicus</i> sp.) have been recorded along a mature tree line within the east of the Site and it is considered that the network of hedgerows and woodland edge throughout the Site is likely to be of value for local bat species for both commuting and foraging. Birds – Hedgerows, scrub, trees, woodland and buildings within the Site provide suitable habitat for a variety of widespread birds to nest and forage, including priority species under the NERC Act 2006 and Birds of Conservation Concern (BoCC)¹. Dormouse – There are records within 1km of the Site, including three Natural England dormouse mitigation licences c.200m north-west. 2016 surveys of the southern part of the site did not record dormice, however given the age of data and small area surveyed it is recommended that update surveys are undertaken. Woodland, hedgerows and dense scrub provide suitable habitat for dormice and are connected to more extensive habitat beyond the Site boundary. Great crested newt (GCN) – There are two Natural England GCN mitigation licences c.850m south-west and there are older records (before 1996) from within 300m. There are at least two ponds within 250m of the Site, and a further three within 500m (excluding any north of the M23 motorway), but none within the Site itself. Should great crested newts be present in surrounding ponds, it is considered relatively unlikely that they would utilise the Site due to the relatively large dispersal distances between ponds, the presence of major roads acting as barriers to dispersal and the presence of suitable terrestrial habitat in closer proximity to off-site ponds. Invertebrates - Habitats on Site present opportunities for a broad range of common invertebrates with some notable species possible, such as brown hairstreak due to the presence of suckering blackthorn. Mature trees may also support notable deadwood invertebrates. Riparian mammals – No records of water vole within 2km were returned as part of the data search in 2015. Possible evidence of burrows along the banks of the western watercourse suggest that water vole could be present, although the lack of emergent vegetation makes the Site sub-optimal. Other surveyed ditches were considered unsuitable due to size, lack of flowing water and isolation. No suitable habitat for otter is present. Reptiles - Suitable terrestrial habitat for common reptiles is present, particularly for common lizard and slow-worm. The dense tussocky sward structure and deep thatch within the western fields, and likely within the unsurveyed central and eastern fields, combined with bordering scrub and woodland, provide suitable refuge and invertebrate food resource. Hedgehog – The fields, scrub, woodland and garden habitats on Site provide good habitat for hedgehog and records are present within the area. </div> </div> <p style="font-size: small; margin-top: 20px;"> ¹ Eaton M, Aebischer N, Brown A, Hoam R, Lock L, Mudgeve A, Noble D, Stroud D and Gregory R. (2015) Birds of Conservation Concern 4: the population status of birds in the UK, Channel Islands and Isle of Man. British Birds 108: 708-748. </p> <div style="display: flex; justify-content: space-between; font-size: x-small;"> <div style="width: 48%;"> <p>Technical Note - Ecology 1292-ETN-FM</p> <p style="text-align: center;">4</p> <p style="text-align: right;">13 June 2023</p> </div> <div style="width: 48%;"> <p>Technical Note - Ecology 1292-ETN-FM</p> <p style="text-align: center;">5</p> <p style="text-align: right;">13 June 2023</p> </div> </div>

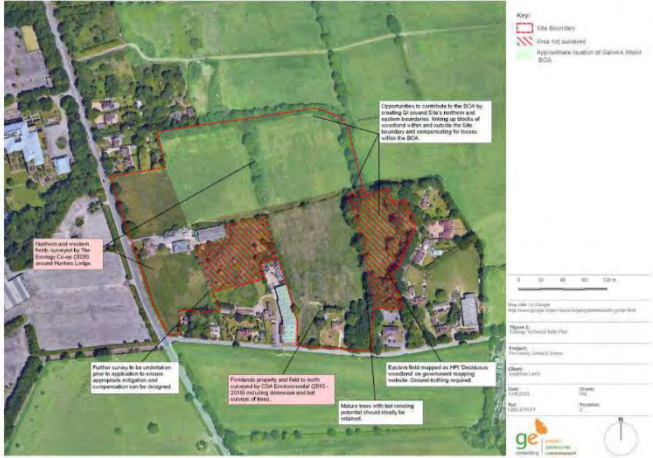
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			<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>Jonathan Lamb Femlands, Gatwick Green, Fernhill Road, West Sussex</p>  <p>5 CONSTRAINTS AND DESIGN OPPORTUNITIES</p> <p>This section seeks to identify where the presence of designated areas, habitats or the potential for protected or notable species to be present will be a material consideration for the LPA when considering future development proposals. It is based on the assumption that detailed further survey work would be completed to inform detailed design and accompany any future planning application for development of the Site (see Section 6).</p> <p>5.1 Designated Sites</p> <p>A screening assessment of Likely Significant Effects (LSEs) within the Draft HRA of the Crawley Local Plan (Lepus Consulting, 2021) indicates alone and in-combination effects of the Gatwick Green development on air quality, potentially impacting:</p> <ul style="list-style-type: none"> ■ Ashdown Forest SAC and SPA; and ■ Mole Gap to Reigate Escarpment SAC. <p>In addition, in relation to hydrology, it may increase discharges to Wastewater Treatments Works or increase pressure on public water supply abstraction. The HRA predicts changes in water quality and water quantity at:</p> <ul style="list-style-type: none"> ■ Mole Gap to Reigate Escarpment SAC; ■ Arun Valley SPA/ SAC/ Ramsar, and ■ The Mens SAC. <p>The HRA indicates that detailed air quality modelling, water quality and water quantity assessments are currently underway to further define impacts associated with increased traffic movements. It is anticipated that policy wording may require expanding to include sustainability measures, measures for water efficiency and protection of water quality to reduce impacts to negligible. Given the distances of these designations from the Site, it is anticipated that this will be achievable.</p> <p>5.2 Local Priorities/ BAP/ Conservation Strategies</p> <p>Whilst the Biodiversity Opportunity Area which covers part of the Site receives no statutory protection, it indicates where there are opportunities to provide net gains for biodiversity and can be used to inform opportunities for habitat creation and restoration. In addition, BOA's are recognised within the Crawley Green Infrastructure SPD and for 'impacts which reduce, block or harm green infrastructure, the applicant should clearly explain this, why it can't be avoided and how they have been mitigated and/or compensated for'.</p> <p>Development of this Site could therefore offer opportunities to contribute to the Gatwick Woods BOA, ensuring that ecological (habitat) networks are maintained and enhanced. For example, the existing network of outgrown hedges/ treelines around the north and east of the Site could be expanded and enhanced, linking to small blocks of woodland in the south-east corner, north and west of the Site. The ecological network can be multi-functional, providing ecological benefits as well as creating an attractive setting for the development, providing space for recreation and encouraging sustainable travel e.g. cycle paths.</p> <p>5.3 Habitats and Flora</p> <p>In order to be compliant with planning policy and protect features of ecological value, the 'Mitigation Hierarchy' needs to be applied during development of proposals. This is a set of principals which are followed in sequential order: avoidance, mitigation and, as a last resort, compensation.</p> </div> <div style="width: 48%;"> <p>Jonathan Lamb Femlands, Gatwick Green, Fernhill Road, West Sussex</p>  <p>HPIs should form the basis of habitat retention where possible. At this Site, retention should therefore focus on:</p> <ul style="list-style-type: none"> ■ Hedgerows; ■ Woodland; and ■ Mature trees. <p>These habitats, with suitable buffer zones could form wildlife networks as well as Green Infrastructure (GI) through the Site. As these habitats are mainly focused around the Site peripheries and eastern areas, this offers good opportunities to tie in with the BOA enhancements discussed above. A full survey of the Site will be required to identify the habitats outside the previously surveyed areas and identify their value.</p> <p>If ancient woodland is present, a minimum 15m buffer will be required between the development and the ancient woodland, including through the construction phase. A comprehensive Arboricultural survey should be undertaken prior to the detailed design stage.</p> <p>Unavoidable losses of habitats will need to be adequately compensated for in accordance with national and local policy.</p> <p>New habitat creation should focus on areas with high biodiversity value. This could include new woodland and hedgerows, orchards, species-rich grassland and wildlife-friendly SuDS schemes/ wetlands (bearing in mind potential constraints relating to Gatwick Airport and bird strike).</p> <p>Ditches, including those adjacent to Site should be buffered and measures employed to prevent pollution.</p> <p>5.4 Protected and Notable Fauna</p> <p>Appropriate design opportunities and constraints relating to fauna will be based on up-to-date survey work for these species, however, a summary of possible design considerations is provided below.</p> <ul style="list-style-type: none"> ■ As a preliminary assessment, hedgerows, trees and woodland edge may form important bat, bird and dormouse habitat. Mature trees may be important for notable deadwood invertebrates. These habitats should be retained where possible. Retained and created habitat should be designed to provide connectivity across the landscape (e.g. north to south and east to west); ■ Wildlife corridors should be protected from light-spill. As a guide, a buffer of 10 – 15m between important habitat and built development is usually sufficient to mitigate light-spill; ■ Buildings and suitable trees within the Site have the potential to support roosting bats and will require an assessment to determine presence/ likely absence. If roosts are found, retention of the roost or a like-for-like replacement roosts will be required (in accordance with the conditions of a suitable Natural England EPS derogation licence). ■ If reptiles are found to be present, GI can be designed to act as a 'receptor area' for populations found within the build area. The habitat within GI can be enhanced through the creation of tussocky grassland, sunny banks and habitat piles for refuge; ■ Planting schemes should incorporate plants that support invertebrates. There are opportunities to support the West Sussex Pollinator Action Plan 2019 – 2022 by protecting and enhancing important pollinator habitat (e.g. trees and hedgerows) and creating pollinator-friendly environments as part of GI. To include native plants or those listed on RHS Plants for Pollinators, habitat piles, structurally diverse habitats and reduced cutting regimes via long-term management principles; ■ Include integrated or surface mounted boxes for bats, birds and invertebrates on new buildings; ■ Given the proximity to Gatwick Airport consideration will need to be given to bird species that could be attracted to new buildings (such as gulls which nest on flat roofs) and appropriate mitigation/ management designed in; ■ The presence of badger setts on the Site (to be confirmed within unsurveyed areas) will require minimum 20m buffers in which no construction/ excavation occurs. If present, adequate wildlife </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div data-bbox="757 1129 1025 1157"> <p>Technical Note - Ecology 1282-ETN-FM 6</p> </div> <div data-bbox="1227 1129 1283 1141"> <p>13 June 2023</p> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div data-bbox="1451 1157 1563 1184"> <p>Technical Note - Ecology 1282-ETN-FM 7</p> </div> <div data-bbox="1933 1157 1989 1168"> <p>13 June 2023</p> </div> </div>

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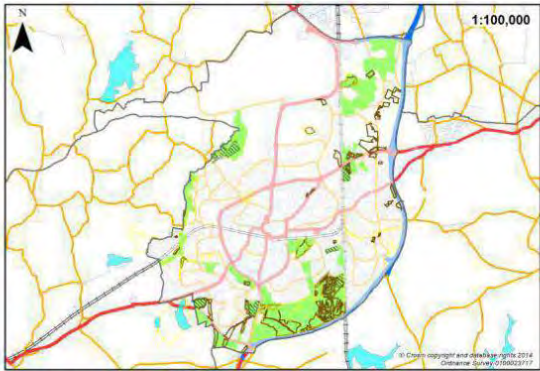

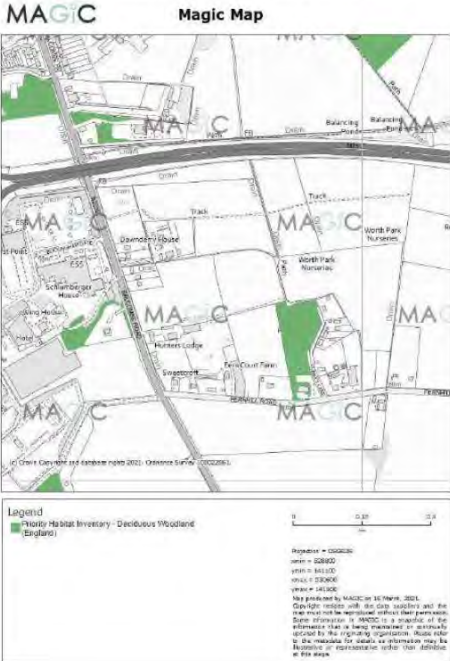
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			<p data-bbox="757 300 987 323">Jonathan Lamb Fernlands, Gatwick Green, Fernhill Road, West Sussex</p>  <p data-bbox="801 352 1267 392">corridors and foraging habitat will need to be provided. These spaces can form part of landscaping/ open spaces/ green infrastructure. It may be possible to close setts if required, although new artificial setts may be required (e.g. for main breeding setts);</p> <ul data-bbox="786 392 1267 424" style="list-style-type: none"> A planning application is likely to require a Landscape and Ecology Management Plan (LEMP) and Construction Environmental Management Plan (CEMP) prior to works/ occupation. <p data-bbox="757 432 925 448">6 BIODIVERSITY NET GAIN</p> <p data-bbox="786 459 1267 515">There is already policy requirement to enhance nature conservation and the Government are planning to roll out a legislative requirement for achieving a 10% net gain in biodiversity for all developments. This 10% gain relates to both linear habitats (e.g. hedgerows) and non-linear habitats (e.g. grassland/woodland) and requires the use of a 'metric' to calculate the required biodiversity units.</p> <p data-bbox="786 528 1267 568">It is important that BNG is considered early in the design stage to ensure that proposals can meet this requirement, or identify whether biodiversity offsetting payments will be required, i.e. paying for BNG offsite.</p> <p data-bbox="786 580 1267 638">High distinctiveness habitats (woodland, mature trees, hedgerows) should be favoured for retention as opposed to low distinctiveness habitats (hard standing and improved grassland), which are easier to replace. New habitat creation should focus on those with high biodiversity value, for example wetlands, ponds, meadows and orchards.</p> <p data-bbox="757 651 931 667">7 FURTHER SURVEY WORK</p> <p data-bbox="786 678 1267 710">The following timeline details the surveys that should accompany a planning application, along with key timings. Results and appropriate mitigation would be reported within an Ecological Impact Assessment.</p> <p data-bbox="786 719 981 735">Table 2: Further Survey Work Required</p> <table border="1" data-bbox="786 740 1285 943"> <thead> <tr> <th>TASK</th> <th>Jan</th> <th>Feb</th> <th>Mar</th> <th>Apr</th> <th>May</th> <th>Jun</th> <th>Jul</th> <th>Aug</th> <th>Sep</th> <th>Oct</th> <th>Nov</th> <th>Dec</th> </tr> </thead> <tbody> <tr> <td>Phase 1 Habitat Survey and Condition Assessment for BNG</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Badger survey</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Breeding Bird survey</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Great crested newt survey</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Roosting bats – daytime building & tree inspections</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Bat emergence survey (dependent on results of above) (up to 3 visits)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Commuting foraging bats</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Reptile survey</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Domouse survey</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Water vole survey</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td colspan="3">Optimal</td> <td colspan="5">Sub-optimal</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p data-bbox="757 967 871 983">8 CONCLUSIONS</p> <p data-bbox="786 994 1267 1026">In summary it is concluded that there are no in principle ecological constraints preventing allocation of this Site for future development. Furthermore;</p> <ul data-bbox="786 1038 1267 1062" style="list-style-type: none"> The Site is unlikely to be constrained by the presence of statutory designated sites for nature conservation in the local area, subject to further assessment and possible mitigation; <p data-bbox="757 1110 1267 1134">Technical Note - Ecology 1282-ETN-FM 8 13 June 2023</p>	TASK	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Phase 1 Habitat Survey and Condition Assessment for BNG													Badger survey													Breeding Bird survey													Great crested newt survey													Roosting bats – daytime building & tree inspections													Bat emergence survey (dependent on results of above) (up to 3 visits)													Commuting foraging bats													Reptile survey													Domouse survey													Water vole survey														Optimal			Sub-optimal								
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			<p data-bbox="1496 300 1727 323">Jonathan Lamb Fernlands, Gatwick Green, Fernhill Road, West Sussex</p>  <ul data-bbox="1525 344 2000 440" style="list-style-type: none"> Habitat retention should focus on those features of highest ecological value, contributing to local conservation strategies/ priorities where possible; Development should aim to retain and incorporate features for protected and notable species, including a network of wildlife corridors through and around the Site; Development proposals may require offsetting to ensure biodiversity net gain can be achieved. Detailed design and any future planning application should be informed by further ecological survey work. <p data-bbox="1496 1082 2000 1106">Technical Note - Ecology 1282-ETN-FM 9 13 June 2023</p>																																																																																																																																																												



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Ref. No.	Respondent	Policy/ Para	Comments
			<p>Jonathan Lamb Famhills, Quexick Green, Famhill Road, West Sussex</p> <p>9 REFERENCES</p> <p>BSI (2013) BS42022: 2013 Biodiversity. Code of practice for planning and development. British Standards Institution, London, UK.</p> <p>CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.</p> <p>CSA Environmental (2017) Former Famhills Nursery, Famhill Road, Horley – Ecological Impact Assessment. Report ref. CSA/277625.</p> <p>Elton M., Aebischer N., Brown A., Hearn R., Lock L., Muirgrove A., Noble D., Stroud D. and Gregory R. (2015) Birds of Conservation Concern 4: the population status of birds in the UK, Channel Islands and Isle of Man. British Birds 108: 706-746.</p> <p>Lepus Consulting (2021) Habitats Regulations Assessment of the Crawley Borough Council Local Plan – DRAFT Report to inform the HRA.</p> <p>The Ecology Co-op (2020) Preliminary Ecological Assessment – Land East of Balcombe Road, Horley.</p> <p>West Sussex County Council (2018) Pollinator Action Plan 2019 – 2022. Available at https://www.westsussex.gov.uk/media/121150/pollinator_action_plan1.pdf</p>  <p>Technical Note - Ecology 1202-87th-PA1</p> <p>10</p> <p>13 June 2023</p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>Jonathan Lamb Fernlands, Gatwick Green, Farnhill Road, West Sussex</p>  <p>Appendix 1 – General Glossary of Terms</p> <p>Annex I Threatened bird listed on Annex I of the EC Birds Directive</p> <p>Annex II Habitats and species of community interest whose conservation requires the designation of SACs</p> <p>BAP Biodiversity Action Plan</p> <p>BNG Biodiversity Net Gain</p> <p>BoCC Bird of Conservation Concern (published by Eaton et al., 2015)</p> <p>CEMP Construction Environmental Management Plan</p> <p>EPS European Protected Species</p> <p>HPI Habitat of Principal Importance required under Section 41 of the NERC Act 2006</p> <p>JNCC Joint Nature Conservation Committee</p> <p>LBAP Local Biodiversity Action Plan</p> <p>LEMP Landscape and Ecology Management Plan</p> <p>NERC Act Natural Environment and Rural Communities Act 2006</p> <p>NVC National Vegetation Classification Survey</p> <p>SAC Special Area of Conservation</p> <p>SPA Special Protection Area</p> <p>SPI Species of Principal importance required under Section 41 of the NERC Act 2006</p> <p>SSSI Site of Special Scientific Interest</p> <p>WCA Wildlife and Countryside Act 1981(as amended)</p> <p>Technical Note – Ecology 1262-ETH-PM 12 19 June 2023</p>
			<p>Jonathan Lamb Fernlands, Gatwick Green, Farnhill Road, West Sussex</p>  <p>Appendix 2 – Planning Policy and Legislation</p> <p>Habitat and Species Legislation</p> <p>Species and habitats receive legal protection in the UK under various legislation, including:</p> <ul style="list-style-type: none"> • The Wildlife and Countryside Act (WCA) 1961 (as amended); • The Conservation of Habitat and Species Regulations 2017 (as amended); • The Countryside Rights of Way (CROW) Act 2000; • The Hedgerows Regulations 1997; • The Protection of Badgers Act 1992; and • The Natural Environment and Rural Communities (NERC) Act 2006. <p>Where relevant, this report takes into account the legislative protection afforded to specific habitats and species.</p> <p>National Planning Policy Framework 2019</p> <p>The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how local planning authorities should incorporate them into their own policies and plans. Chapter 15 of the NPPF contains several policies targeted at enhancing the natural environment and requires local authorities to consider how impacts on biodiversity can be minimised and provide net gains in biodiversity. Paragraph 170 states that:</p> <p>"Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <ol style="list-style-type: none"> a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodlands; c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate; d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and f) remedying and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate." <p>Additional Planning Practice Guidance (PPGs) supports the NPPF and includes guidance on:</p> <ul style="list-style-type: none"> • Landscape; • Biodiversity, ecosystems and green infrastructure; and • Brownfield land, soils and agricultural land. <p>Technical Note – Ecology 1262-ETH-PM 13 19 June 2023</p>

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			<p>Jonathan Lamb Farnlands, Gatwick Green, Fernhill Road, West Sussex</p> <p style="text-align: right;"></p> <p>Appendix 3 – Designated Sites in Crawley (extract from current Local Plan)</p>  <p>1:100,000</p> <p>© Crown Copyright and GeoInformation Ltd 2014 Ordnance Survey/0100023117</p> <p>Legend: ■ Sites of Special Scientific Interest (Policy ENV2) ■ Site of Nature Conservation Importance (Policy ENV2) Ancient Woodland (Policy ENV2) Local Nature Reserves (Policy ENV2) ■ Biodiversity Opportunity Areas (Policy ENV1 & ENV2)</p> <hr/> <p>Technical Note - Ecology 1282-ETN-FM</p> <p style="text-align: center;">14</p> <p style="text-align: right;">13 June 2023</p>
			<p>Jonathan Lamb Farnlands, Gatwick Green, Fernhill Road, West Sussex</p> <p style="text-align: right;"></p> <p>Appendix 4 – Habitats of Principal Importance in Relation to Site (MAGIC map)</p>  <p>MAGIC Magic Map</p> <p>Legend: ■ Priority Habitat Inventory - Deciduous Woodland (England)</p> <p>Scale: 0 0.25 0.5 km</p> <p>Revised: 05/2020 Item: 02/010 Job: 14/10/20 Draw: 15/10/20 User: JAL/BC</p> <p>Not produced by MAGIC on 16 March 2021. Copyright reserved with the data providers and the user must not be reproduced without their permission. Some information in MAGIC is a copyright of the information that is being requested or extracted subject to the following conditions. Users must not be made aware of details or information that the National or international water user address the user.</p> <hr/> <p>Technical Note - Ecology 1282-ETN-FM</p> <p style="text-align: center;">15</p> <p style="text-align: right;">13 June 2023</p>

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			<p>Appendix 6. Landscape Note prepared by Pegasus</p> <hr/> <p>P21-0684 </p> <hr/> <p>GATWICK GREEN INPUT INTO DEVELOPMENT FRAMEWORK DOCUMENT – LANDSCAPE AND VISUAL MATTERS March 2021</p> <p>Landscape Designations and Planning</p> <ol style="list-style-type: none"> The site is not covered by any designation at a national or regional level that recognises a specific landscape importance. The site lies within the corridor of a long distance view from Target Hill Park to the south-west of Crawley, as identified under Policy CH8 of Crawley District Council's Local Plan. The aim of the policy is to ensure the view remains unobstructed by development in the foreground, however, it is noted that the site is approximately 8km to the north-east of the corridor. The site is located within an area defined as the North East Crawley Rural Fringe, as identified under Policy CH9 of Crawley District Council's Local Plan. The policy states: <ul style="list-style-type: none"> <i>To ensure that Crawley's compact nature and attractive setting is maintained, development should:</i> <ol style="list-style-type: none"> <i>Be grouped where possible with existing buildings to minimise impact on visual amenity;</i> <i>Be located to avoid the loss of important on-site views and off-site views towards important landscape features;</i> <i>Reflect local character and distinctiveness in terms of form, height, scale, plot shape and size, elevations, roofline and pitch, overall colour, texture and boundary treatment (walls, hedges, fences and gates);</i> <i>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;</i> <i>Ensure the building and any outdoor storage and parking areas are not visually prominent in the landscape;</i> <i>Does not generate an unacceptable level and/or frequency of noise in areas relatively undisturbed by noise and valued for their recreational or amenity value;</i> <i>Does not generate traffic of a type or amount inappropriate to the rural roads; and</i> <i>Does not introduce a use which by virtue of its operation is not compatible with the countryside.</i> <p><i>Where harm to the landscape character cannot be avoided appropriate mitigation and, as a last resort, compensation, will be required as part of a planning application. Applicants are advised to consider the enhancement opportunities identified in the Crawley Borough Council Landscape Character Assessment.</i></p> <hr/> <p style="text-align: right;">March 21 1</p>
			<p>P21-0684 </p> <hr/> <ol style="list-style-type: none"> Under Policy CH9, it specifically states in relation to North East Crawley Rural Fringe that '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.' Northern most fields within the site are located within a Biodiversity Opportunity Area as defined by Policy ENV2 of Crawley District Council's Local Plan. The policy states that 'All development proposals will be expected to incorporate features to encourage biodiversity where appropriate, and where possible enhance existing features of nature conservation value within and around the development.' <p>Landscape Character</p> <ol style="list-style-type: none"> The site lies within National Character Area 121: Low Weald. At a regional level, the site is located to the north-east of the Northern Vales Landscape Character Area as set out in the West Sussex County Council Landscape Character Assessment. The land management guidelines overarching goal is to 'Conserve the mostly rural character of the area', with specific guidelines of relevance to the site as follows: <ul style="list-style-type: none"> <i>Conserve, manage and restore woodlands, hedgerows, hedgerow trees, field ponds, species rich grassland and meadows, unimproved grassland and meadows.</i> <i>Maintain historic character including small scale field patterns, earthworks and historic parkland.</i> <i>Establish a framework of new woodland and hedgerow planting.</i> <i>Promote the establishment of field margins in arable areas.</i> <i>Conserve historic lanes with their ancient oaks and unimproved roadside verges.</i> <i>Focus on the enhancement of the major transport corridors, seeking better integration into the existing field pattern of the wider landscape.</i> <i>Ensure any small scale development responds to the historic dispersed settlement pattern and local design and materials.</i> <i>Ensure any new development around the urban edges, in particular ...Crawley...is well integrated with the wider landscape pattern. Encourage bold native woodland and hedgerow planting. Buildings should also blend in with the landscape in scale, form, colour and design.</i> <i>Encourage screen planting of native trees and woodland around roadside buildings and service areas, and industrial and commercial development, including Gatwick Airport.'</i> At a local level, the site is located within Area 6 – High Woodland Fringes Landscape Character Area. The area is identified as having high landscape value, but a moderate sensitivity to change, being sensitive to elements such as large scale commercial and residential development and the condition of the landscape is considered to be declining due to increasing visual/noise intrusion in some parts. The planning guidelines for the landscape character area are as follows: <hr/> <p style="text-align: right;">March 21 2</p>

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			<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>P21-0684</p>  <ul style="list-style-type: none"> Proposals must respect the important role of the area to maintaining the separate identities of Gatwick Airport, Crawley and Hovey. Incremental development should be resisted to prevent the actual and perceived reduction in the highly valued open character of this area. Proposals should follow the wider planning and land management guidelines of the Low Weald Northern Vales character area. <p>Context</p> <p>6. The site is located between Fernhill Road and Balcombe Road, to the east of Gatwick Airport and close to the M23 motorway, including a spur which provides a connection to the airport. The site is made up of a series of mostly irregular shaped agricultural fields, with the inclusion of a number of buildings including Hunters Lodge and an agricultural outbuilding to the west and Fernlands and an office building between Fernhill Road and Donkey Lane to the south-east.</p> <p>9. The site is surrounded by a number of residential, farm and employment buildings off the surrounding road network. Land to the north and south of Fernhill Road is predominantly agricultural, with the M23 forming a prominent visual detractor in the surrounding landscape. The landscape to the west is dominated by car parking, employment buildings, hotels and retail uses.</p> <p>10. A public right of way (36755v) is located adjacent to the eastern site boundary, which provide a rural link between Fernhill Road and Balcombe Road to the north-west of the site. Close to the south-east corner of the site, another public right of way (359ay) follows a fenced off track adjacent to car parking associated with Gatwick Airport, before heading further southward and connecting to Radford Road. The Sussex Border Path long distance footpath is located to the east and north of the site, where it follows Peeks Brook Lane to the east before crossing the M23 and heading westward adjacent to the motorway. The Tandridge Border Path long distance footpath links with the Sussex Border Path east of the M23 and to the north-east of the site.</p> <p>11. A dense network of mature trees surrounds Fernlands and the office building to the south-east, which follow Donkey Lane and the public right of way. A tree lined hedgerow aligns most of Fernhill Road, coupled with residential properties and their associated garden vegetation, limits visibility into the site. Where the site abuts Balcombe Road (B2036) the site is defined by clipped field boundary hedgerows, with occasional mature trees within the hedgerows further to the south, which provides a more open aspect from the road. A mature tree belt defines the north-eastern and northern boundaries, which provides visual enclosure. The internal field boundaries are of variable quality, with those most established appearing to the north.</p> <p>12. Views towards the site from surrounding areas are well contained by the surrounding network of mature vegetation. Therefore, views are limited to the network of roads and footpaths either adjacent to or in the vicinity of the site, and do not extend beyond the M23 or the areas of woodland to the south and south-west.</p> </div> <div style="width: 45%;"> <p>P21-0684</p>  <p>Opportunities and Constraints</p> <p>13. The following landscape and visual opportunities and constraints are shown on the supporting plan and set out below.</p> <p>Opportunities</p> <p>14. The principal landscape and visual opportunities for the site comprise:</p> <ul style="list-style-type: none"> the potential to manage and enhance the existing field boundaries and mature trees, to provide visual enclosure and to enhance wildlife benefits; the potential to manage and enhance the internal network of field boundary hedgerows; the potential to enhance the local wildlife and biodiversity through new planting and the introduction of new landscape features; the potential to provide improved connections to the surrounding roads and public footpaths; and the potential to enhance the intimate landscape area to the south-east for recreation and/or local wildlife. <p>Constraints</p> <p>15. The principal landscape and visual constraints for the site comprise:</p> <ul style="list-style-type: none"> Openness of Balcombe Road with clear and unobstructed views over western parts of the site; The potential for the area of biodiversity enhancement to the north of the site to restrict development; potential loss of existing site features including trees and hedgerows, in particular, to the south-east; potential to adversely affect the visual amenity of local residences, particularly those abutting the site along Fernhill Road and Balcombe Road; and potential to adversely affect the visual amenity of vehicles and walkers using surrounding rural roads and the network of public footpaths. <p>Design Considerations</p> <p>16. To assist the design development of future design proposals that mitigate the landscape and visual constraints identified, a number of design considerations are set out below.</p> <p>Vegetation Pattern</p> <p>17. Existing vegetation to the north and east and adjacent to Fernhill Road must be retained and respected, as well as augmented wherever possible.</p> <p>18. The internal network of field boundary vegetation must be respected by any development layout and enhanced.</p> <p>19. Any development needs to be set back from Balcombe Road (B2036), to allow for the addition of new structural planting along the western and south-western edges of the site.</p> </div> </div> <p style="text-align: center;">March 21 4</p>

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Comments

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Pegasus Group

20. Development proposals must adhere to the guidance set out in the county and local landscape character assessments, as set out in paragraphs 6 and 7 above.

21. The creation of a recreational or wildlife area to the south-east should be considered in order to respect the existing trees and vegetation and respect the intimate setting of the landscape.

22. Any new planting or landscape features should aim to enhance the value of the site to local wildlife, in particular, where located within Biodiversity Opportunity Areas to the north as defined by Policy ENV2 of the local plan and shown on the landscape and visual opportunities and constraints plan.

23. Any trees lost as a result of the development must adhere to tree replacement in accordance with Crawley District Councils Policy CH6, based upon tree replacement tree planting in relation to trunk diameter of the tree lost.

24. Development should avoid any impacts upon trees and vegetation within adjacent properties.

25. All landscape proposals must adhere to the guidance in relation to planting in proximity to airports, and in accordance with CAP 772: Wildlife Hazard Management at Aerodromes.

Built Form

26. The development should reflect the height, scale and massing of similar surrounding buildings in the vicinity of the site and be minimised wherever possible.

27. The development should allow for sustainable movement around the site and look for opportunities to improve pedestrian and cycle links in the local area.

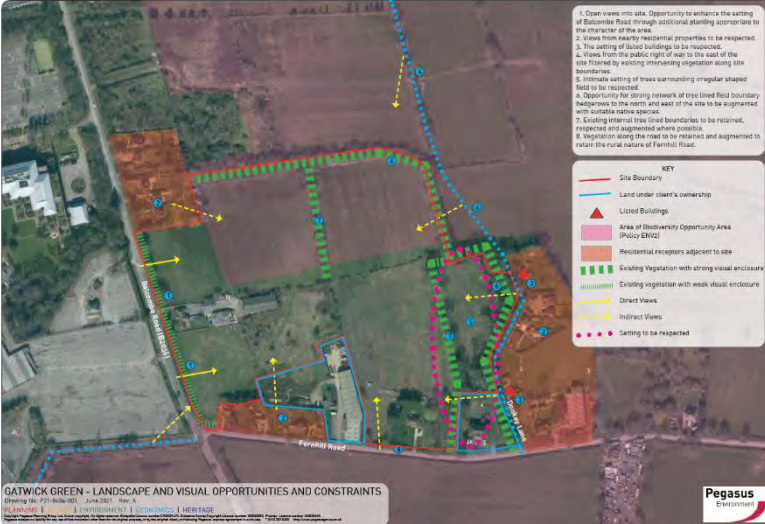
Surrounding Land Uses

28. Any development must be appropriately offset from the adjacent residential properties to respect their visual amenity.

29. The development must respect the setting of the listed buildings to the east of the site, as well as other surrounding locally listed buildings further to the east and those listed buildings to the west.

30. Any development must ensure that the setting of the public right of way is respected, with mitigation within the site to limit views toward development proposals.

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Appendix 7. Drainage Strategy prepared by PHG



HYDROLOGICAL ASSESSMENT - LAND OFF FERNHILL ROAD, HORLEY

PHG Consulting Engineers have reviewed the available information to assess the hydrology in the area of the proposed development site. It has been concluded that there is a very low risk of fluvial flooding and the low risk of surface water flooding can be reduced with the introduction of site-specific positive drainage.

The site is located at grid reference TQ296413 (E529659, N141326) and bound to the south by Fernhill Road, to the west by Balcombe Road, to the north by greenfield land and to the east by Donkey Lane and further greenfield. The site location is shown in figure 1. The existing ground levels range from approximately 60.00m AOD to 58.00m AOD and fall typically south to north and in parts east to west.



Figure 1 - Site Location

An existing drainage ditch is shown on online mapping flowing east to west along the northern boundary of the site. Due to the topography of the site any greenfield runoff from the development will flow to this existing ditch. Available lidar data has been reviewed to determine the topography of the site and fall arrows indicate that further smaller ditches may be present onsite. A detailed topographical survey will be required to determine where any existing drainage ditches flow. The drainage ditch system also runs along the eastern kerblane of Balcombe Road and is

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culverted under the existing private accesses, any future crossing of this ditch would require a new culvert and Ordinary Watercourse Consent.

Flood Risk

Flood maps available at GovUK have been reviewed to determine the risk of flooding from various source within the site. Figure 2 below shows the extent of fluvial flooding from rivers and shows the development site to be away from the extents of fluvial flooding.







Figure 2 - Fluvial Flood Extents from GovUK

Flood maps also show the risk of surface water flooding within an area, at the development site there is a large area at 'low' risk of surface water flooding as shown in figure 3. Areas of low flood risk have a likelihood of flooding between 0.1% and 1%. The depth of surface water flooding in this area ranges between 0-300mm and 300mm-900mm as shown in figure 4. The velocities of the are generally below 0.25m/s (figure 5) and therefore are not deemed to pose a major hazard. Flooding from surface water can be difficult to forecast due to small differences in rainfall intensity and volumes, local features can also affect the likelihood and severity of flooding. Surface water flooding within the site is mainly contained in the low-lying area at the north western corner.





Surface water runoff from the greenfield will add to any surface water flooding shown on the below maps. Therefore, the development of the site can reduce the extent of surface water flooding by reducing rate and volumes of runoff to this area. Given the likelihood of surface water flooding is minimal and anticipated depths are low, the overall risk of surface water flooding post development will be negligible. The proposed drainage strategy should reduce flow rates and volumes and make space for water.

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			<p data-bbox="1115 288 1240 336"></p>  <p data-bbox="768 687 927 703">● High ● Medium ● Low</p> <p data-bbox="768 715 1012 730">Figure 3 – Surface Water Flood Extents from Gov.UK</p> <p data-bbox="768 1075 1218 1086">PHG CONSULTING IS A BRAND NAME OF PHG CONSULTING ENGINEERS LTD REGISTERED IN ENGLAND AND WALES NUMBER 0715080</p>
			<p data-bbox="1890 288 2016 336"></p>  <p data-bbox="1563 639 1823 655">● Over 900mm ● 300 to 900mm ● Below 300mm</p> <p data-bbox="1563 667 1792 683">Figure 4 – Surface Water Flood Depths from Gov.UK</p> <p data-bbox="1563 1018 1984 1029">PHG CONSULTING IS A BRAND NAME OF PHG CONSULTING ENGINEERS LTD REGISTERED IN ENGLAND AND WALES NUMBER 0715080</p>




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			<div style="text-align: right; margin-bottom: 10px;">  </div>  <p>Figure 5 – Surface Water Flood Velocities from GovUK</p> <p>Reservoir Flooding Part of the northern section of the site is within the extent of reservoir flooding with maximum depths between 300mm to 1m. Generally, reservoir flood risk maps are produced to inform reservoir owners and help produce evacuation and early warning plans. The likelihood of reservoir flooding is considered to be minimal and should not affect the use of land.</p> <p>Historic Flooding The West Sussex SFRA provides an outline of historical flood events, however this information is limited and, in many cases, does not include the type of flooding. There are no known flood events within the site.</p> <p>Groundwater Flooding The West Sussex SFRA (Figure 1.2) shows the geology of West Sussex and shows the site to be in an area underlain by Clays. Therefore, groundwater flooding may occur from perched water.</p> <div style="text-align: right; margin-top: 20px;">  </div> <p>Flowing above more impermeable soils. A site-specific site investigation will be required and this should determine whether groundwater is encountered during works.</p> <p>Surface Water Drainage The surface water drainage strategy for the site should restrict discharge to the calculated QBAR greenfield runoff rate, this would ensure that during rainfall events greater than the predicted 1 in 2 year event discharge from the site post-development would be reduced. Base on the site area of 9.18ha consisting of 60% impermeable surfacing the QBAR greenfield runoff rate has been calculated to be 28.6l/s. To maximise the benefits of a SuDS approach to surface water management, the use of swales to convey water should be considered and the final attenuation should be provided in a landscaped basin (or basins). This will ensure the surface water drainage network maximises amenity and biodiversity benefits whilst reducing the volume and rates of runoff. The masterplan should allow space within landscaped areas for attenuation basins to be provided. Any attenuation feature within the site should be designed to accommodate flows up to and including the 1 in 100 year with a 40% increase for climate change. To ensure exceedance can be managed, a minimum freeboard of 300mm should be included. Given the above parameters, a 1.3m deep basin with 1 in 3 banks covering a surface area of approximately 2.670m² and providing 4,500m³ storage would be required. Further SuDS techniques such as porous surfaces can be utilised to reduce the overall size of surface water attenuation required.</p> <p>Foul Water Drainage Sewer records have been obtained from Thames Water and show little existing foul sewers with the vicinity of the development. The development is surrounded by greenfield, Gatwick Airport and some smaller development/dwellings. The dwellings in the vicinity of the site are likely to have individual treatment plants and Gatwick Airport would be served by a private drainage system. The nearest Public Sewers are located approximately 600m south of the development in Balcombe Road. Sewer records show that the existing manhole (7801) at the start of this run has an invert level of 57.54m and the public sewer discharges to a pumping station. The pumping station is assumed to have a direct discharge to Crawley Sewerage Treatment Works located 100m to the west. Due to site levels and the invert level of the existing manhole, a pumping station will be required to discharge to the Thames Water network. The pumping station would also include an offsite rising main being laid in Balcombe Road, approximately 500m long. Once the development scale and uses are determined early discussion should take place with Thames Water to ensure sufficient capacity within the existing network.</p> <div style="text-align: right; margin-top: 20px;">  Anthony Owens-Redwood Associate Director PHG Consulting Engineers Tony.owens-redwood@phg-consulting.com </div> <p style="font-size: small; margin-top: 20px;">PHG CONSULTING IS A DIVISION OF PHG CONSULTING ENGINEERS LTD INCORPORATED IN ENGLAND AND TRADE MARK © 2020</p>

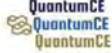


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			<p>Appendix 8: Water Neutrality Strategy</p>   <p>FERNLANDS, FERNHILL ROAD, HORLEY, RH6 9SY</p> <p>Water Supply & Water Neutrality Report</p> <p>Ref: 5782043/TC Date: 11 November 2022 Rev No: V4</p> <p>TABLE OF CONTENTS:</p> <table border="0"> <tr><td>1.0 Existing Site Description</td><td>2</td></tr> <tr><td>1.1 Site Proposals and Site Context</td><td>Error! Bookmark not defined.</td></tr> <tr><td>1.2 Natural England Water Neutrality</td><td>5</td></tr> <tr><td>2.0 Existing Water Use</td><td>6</td></tr> <tr><td>2.1 Existing and Historic Groundwater Use</td><td>9</td></tr> <tr><td>2.2 Outdoor Crop Rainwater Supply</td><td>11</td></tr> <tr><td>3.0 Employment Land Demand</td><td>14</td></tr> <tr><td>3.1 Water Neutrality and Emerging Water Issues</td><td>Error! Bookmark not defined.</td></tr> <tr><td>3.2 Water Demand for the WT Lamb Site</td><td>15</td></tr> <tr><td>4.0 Greywater Recycling</td><td>Error! Bookmark not defined.</td></tr> <tr><td>4.1 Hydraloop Greywater Recycling Specification</td><td>Error! Bookmark not defined.</td></tr> <tr><td>5.0 Conclusion</td><td>18</td></tr> </table> <p>APPENDICES</p> <ul style="list-style-type: none"> • Appendix A - Employment Density Guide • Appendix B - Hydraloop Greywater Recycling Systems 	1.0 Existing Site Description	2	1.1 Site Proposals and Site Context	Error! Bookmark not defined.	1.2 Natural England Water Neutrality	5	2.0 Existing Water Use	6	2.1 Existing and Historic Groundwater Use	9	2.2 Outdoor Crop Rainwater Supply	11	3.0 Employment Land Demand	14	3.1 Water Neutrality and Emerging Water Issues	Error! Bookmark not defined.	3.2 Water Demand for the WT Lamb Site	15	4.0 Greywater Recycling	Error! Bookmark not defined.	4.1 Hydraloop Greywater Recycling Specification	Error! Bookmark not defined.	5.0 Conclusion	18
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			<div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="width: 45%;">  <p>1.0 Introduction</p> <p>This Water Strategy & Water Neutrality document demonstrates how the combined landholdings of WT Lamb and Elliott Metals/The Simmonds Family can make a positive and sustainable contribution to the Gatwick Green employment area proposals. Particularly by addressing the prevailing water issues that are occurring in the area, in this high-water stress region of the country.</p> <p>1.1 Existing Site Description</p> <p>The existing parcel of land comprises of a number of different land holdings; WT Lamb and Elliott Metals/The Simmonds Family together forming a larger 8.8ha employment site that is proposed for allocation. A detailed description of these parcels of land is provided in the following section.</p> <p>WT Lamb Landholding</p> <p>The WT Lamb 8.1ha site consists of an existing residential bungalow with expanses of land behind, that was previously used for horticultural purposes. The historic horticultural use benefitted from the use of greenhouses measuring over 17,000 sq ft., together with other ancillary structures associated with its commercial nursery use. Externally approximately 1.5 ha of land was planted with horticultural produce. Over time the glasshouses have fallen into considerable disrepair, requiring the glass to be removed from the site for health and safety reasons. The property is also served by a high-yield well that has been available to service the horticultural nursery enterprise on the site and in more recent years water has been drawn from the well for maintenance uses. It is understood that the horticultural use and associated planning designation still apply to the site.</p> <p>In addition there is a further (5 ha) consisting of three distinct parcels of land to the north and south of Hunters Lodge and MSL Heat Treatment – a manufacturing company operating from the buildings to the rear of Hunters Lodge who intend to remain on site. In terms of topography, the land is generally flat with the associated three fields being currently used for agricultural purposes.</p> </div> <div style="width: 45%; text-align: right;">  <p>Elliott Metals/The Simmonds Family Landholding</p> <p>The land owned by Elliott Metals/The Simmonds Family measuring approximately 0.7ha, lies to the rear of the family metal recycling center (Elliott Metals). This is a family-run business that has operated from the premises for over 60 years. The land to the rear of the metal business is vacant, flat, suitable, and available for redevelopment. It is yet to be determined whether the metal business would relocate or remain at the site. However, it is currently outside of the red line area of the 8.8ha site seen below.</p> <p><i>Figure 1.1 - Proposed Employment Land Masterplan</i></p>  </div> </div>


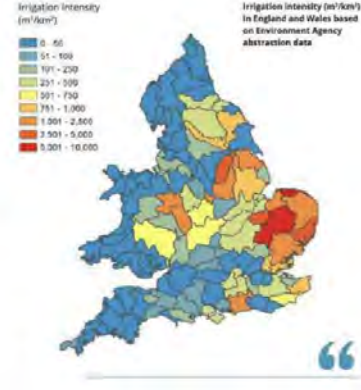
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			<div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="width: 45%;"> <p style="text-align: right;"></p> <p>1.1.1 Proposed Development Site</p> <p>WT Lamb and Elliott Metals/The Simmonds Family control the "missing section" of proposed Strategic allocation EC4. The three landowners have joined together in order to provide an option for a comprehensive approach to the development of the area for employment purposes. For their entire 8.8 ha landholding, it is proposed to install a light B2/B6 industrial development. The proposed development area within the control of our clients sits within the Red Line boundary shown below. The Blue Line boundary indicates the extent of the proposed Gatwick Green area.</p> <p>The WT Lamb site currently benefits from a prolific well that was previously used to serve the horticultural use of the site. The new light industrial use has very little water demand making the water supply available for use on the adjacent sites that are proposed for development. Therefore, resulting in a very sustainable development in a high-water stress area that lies adjacent to the Sussex North Water Resource Supply Zone, an area affected by water neutrality.</p> <p>Figure 1.2 - Proposed Masterplan Context</p>  </div> <div style="width: 45%;"> <p style="text-align: right;"></p> <p>1.2 Natural England Water Neutrality</p> <p>As highlighted in the previous section the proposed development site falls just outside the Sussex North Water Resource Supply Zone. A recent directive from Natural England states that all new accommodation, together with new commercial premises with high water uses, in this area will need to meet the new Habitat Regulations Assessment (HRA) requirement to demonstrate water neutrality. This measure has been stipulated in order to protect ecological flows and reduce the demand for increased water abstraction from the wells at Hardham. As this could potentially adversely impact the integrity of the Arun Valley which has the following protected designations; a Special Protected Area (SPA), a Special Area of Conservation (SAC), and a Ramsar site. A Ramsar site is a wetland site designated to be of international importance under the Ramsar Convention.</p> <p>Typically Water neutrality needs to be demonstrated by the applicant through the submission of a statement or water budget (including calculations) including all/some of the following measures:</p> <ul style="list-style-type: none"> • Provide improvements on the proposed water use from the typical light industrial use of 50 litres down to 30 litres per person per day. • Incorporating low water usage w.c's, showers, aerated taps, etc. – these would be subject to a condition requiring a verification report to demonstrate the completion of the works prior to first occupation. • Incorporating rainwater harvesting. • Incorporating greywater recycling. • Offset the remainder of any water requirements. <p>The HRA requirement for water neutrality covers both quantity and quality objectives. The protocol takes a catchment-wide approach highlighting that greenfield sites will be required to offset additional water demand in order to achieve water neutrality. Whilst the water neutrality requirement is not applicable to the proposed development, however owing to the recent drought, the advent of climate change, and the recurrent issues affecting the water supply it is considered prudent to adopt some of the water neutrality principles with the benefit of the best available technology. In addition, the Environment Agency has indicated that water supply aquifers are being unsustainably overmined by up to 700 million litres/day. The Environment Agency categorically states that there is an absolute requirement to reduce the rate of water consumption starting from the year 2025 (Ref 4). Therefore, in consideration of these constraints it is proposed water use will be significantly reduced and aided by the use of greywater recycling technology that will treat greywater to WHO drinking standards.</p> <p>Consequently, this site in its entirety will deliver an exemplary employment destination that meets water neutrality requirements and addresses prevalent water stress in the area by utilizing the latest technologies. Furthermore, energy saving efficiencies in terms of electrical consumption, generation and insulation.</p> </div> </div>

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			<div data-bbox="1106 316 1218 371" data-label="Image"> </div> <p data-bbox="768 379 927 399">2.0 Existing Water Use</p> <p data-bbox="768 413 1218 501">The historic horticultural nursery consisted of a substantial 17,000 sq.ft., greenhouse together with externally farmed horticultural gardens. The footprint of the historic gardens can be seen in the photographs below and also on the following pages. The greenhouse and the horticultural nursery benefitted from a prolific well that is currently found at the site. The well is known to be very productive and is found to be nearly full of water to surface level most of the year, with seasonal lowering in the summer months.</p> <p data-bbox="887 525 1106 544"><i>Figure 2.1 - Existing Horticultural Fields</i></p> <div data-bbox="815 555 1167 940" data-label="Image"> </div> <div data-bbox="1868 316 1980 371" data-label="Image"> </div> <p data-bbox="1599 376 1930 395"><i>Figure 2.2 - Remnants of Greenhouse and Ancillary Structures</i></p> <div data-bbox="1568 403 1968 663" data-label="Image"> </div> <div data-bbox="1624 679 1910 893" data-label="Image"> </div>



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			<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;">  <p>2.1.1 Greenhouse - Rate of Water Consumption</p> <p>The historic 17,000 sq ft. greenhouses would have been used to grow a variety of exotic orchids and salad crops such as tomatoes, cucumbers, lettuces, peppers, herbs, celery, and aubergines. This would have resulted in the most significant demand for abstracted irrigation water. The glasshouse measures approximately 0.2 ha and would have consumed a significant amount of abstraction water per hectare when compared to the outdoor fields of horticulture crops. The abstraction rates for the area are 25,100,000 to 50,000,000 litres/hectare per year. It is assumed that the glasshouse consumption was based on the upper limit. Therefore, the annual water consumption for the greenhouse was 5,020,000 litres/year.</p> <p>2.1.2 Outdoor Horticultural Crops</p> <p>For outdoor crops, most irrigation water is used to supplement rainfall to varying degrees according to crop requirements. Typical crops would include potatoes and outdoor field vegetables, such as carrots, onions, parsnips, and salad crops. In the United Kingdom most irrigation water is abstracted from surface water rivers or lakes (52%) and groundwater (41%) sources with the remainder from the public water supply, ponds, and harvested rainwater (7%). The outdoor plants are considered to be at the lower threshold of the abstraction water used for irrigation. The site photos indicate that with the exception of the greenhouse the remainder of the 3.10 hectares would have been planted with horticulture crops and is assumed to have been irrigated by natural rainwater. The annual rainfall figures for the area is 25,844,390 litres per year. However, the annual water consumption from the well for these crops would have been approximately 77,650,000 litres/year (25,100,000 x 3.1). This would result in a significant deficit of 51,005,610 litres per year. Most of which is considered to have been supplied by the well.</p> <p>2.1.3 Unlicensed Well Water Demand Abstraction Limit</p> <p>Under the Water Abstraction and Impounding (Exemptions) Regulations 2017, sites abstracting up to 20,000 litres per day are exempt from applying for a groundwater abstraction license. This would provide an annual supply of 7,300,000 litres/year of groundwater for irrigation purposes. This capacity represents 15% of the actual annual demand associated with horticultural uses. It is therefore proposed to undertake detailed yield tests to confirm the actual yield of the existing well. Preliminary site yield tests have indicated that the existing well has a capacity of 8,000 litres/day, additional tests are proposed pursuant to making a formal borehole licence application for the new proposed commercial development. It must be noted that the yield tests were undertaken during the summer of 2022, during one of the most dry periods that has ever been recorded. With the benefit of the well being cleared of detritus and organic matter would have yielded better results and supported a larger water yield.</p> </div> <div style="width: 48%;">  <p>2.2 Outdoor Crop Rainwater Supply</p> <p>The outdoor horticultural crop would have also benefited from rainwater. However, it must be noted that it is susceptible to extreme weather patterns. In this section, we will analyze the variability of rainfall events over the last couple of years.</p> <p>2.2.1 2017 and 2018 Annual Rainfall Patterns</p> <p>During 2017 and 2018 significant areas of the UK experienced below-average rainfall, compounded by a very dry summer which resulted in rainfall being lost to high evaporation, evapotranspiration rates, and runoff resulting in reducing the groundwater recharge rates (Ref 2).</p> <p>2.2.2 2019 Annual Rainfall Patterns</p> <p>The annual rainfall in 2019 was significantly above the 1901 - 2010 average (Ref 3). This variability in rainfall in extreme weather patterns owing to climate change makes rainwater a very unreliable source of water for sustaining the typically high-water demand for horticultural crops. In order to cope with any deficits in water, supply reliance would have been placed on an alternative source of water supply. The only alternative water supply available to the horticultural site is the well groundwater supply stated in the previous section, whose capacity will be confirmed in due course.</p> <p>2.3 Water Supply Strategy</p> <p>It is therefore proposed to maintain the well water supply as the primary water supply source to the proposed development site. This also will also mean no additional water demand will be placed on the existing water infrastructure except for the purposes of maintaining an emergency water supply. It is proposed to install a water supply system that benefits from greywater recycling, which enables used water to be recycled and used for toilet flushing, cleaning or irrigation. Greywater is generated owing to daily water use, therefore provides a reliable source of water for non-potable uses.</p> </div> </div>



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			<div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="width: 45%;">  <p>3.0 Employment Land Proposals</p> <p>The Covid-19 pandemic rapidly accelerated the move to e-retail coupled with the demand for logistical space. The logistics demand is extremely strong, particularly in areas with higher population densities, vibrant economic activities, and major transport hubs such as Gatwick. It is therefore anticipated that for Gatwick the future logistical space requirements will significantly outstrip historic trends in this market. The increasing adoption of online sales by mainline shops and national brands, coupled together with the emergence and exponential growth of many small SME e-retailers cements this demand. Enablers and facilitators like Amazon and third-party logistics operators are experiencing the need for rapid expansion in order to cope with the demand. The Gatwick area is an excellent location at the heart of the South East and is in close proximity to both the South Coast and South London.</p> <p>The Updated EGA - Employment Land Proposals</p> <p>The proposals for employment land provision draw heavily on the underpinning evidence base, with the latest Economic Growth Assessment (EGA) Focused Update (September 2020) stating an overall requirement of 38.7 ha, being the figure carried forward to the Pre-Submission Local Plan. Including the 10% flexibility allowance, the EGA update figures indicate that a net floorspace requirement of 133,700 sq.m. of industrial (B1c/B2/B8) uses would be required. Assuming a typical density of 4,000 sq.m. per hectare this would equate to a land requirement of 33.4 hectares. However, the Employment Land Trajectory (January 2021) allows for a total provision for B1c/B2/B8 floorspace of 118,920 sq.m., indicating a shortfall of 14,780 sq.m.</p> <p>The above-mentioned trajectory document also indicates that the proposed allocation at Gatwick Green will deliver 77,600 sq.m. on 24.1 ha; this equates to a density of 3,228 sqm/hectare. Consequently, the shortfall of 14,780 sq.m., would require a further 4.6 ha of light industrial land to be allocated within the Local Plan. Our client's 8.8 hectares of land bounded on three sides by the Gatwick Green development provides ample capacity to accommodate this shortfall in a holistic and coordinated manner. The surplus land will be available to meet ancillary, infrastructure and amenity requirements. Key to creating a viable and truly sustainable industrial development will be the requirement to address environmental constraints, meet biodiversity net gain requirements and provide opportunities for enhanced suds and landscaping features.</p> </div> <div style="width: 45%; text-align: right;">  <p>3.1 Water Demand for the WT Lamb Site</p> <p>The 3.1 ha WT Lamb site benefits from a well which has currently yielded 8,000 litres/day. It is also noted that the historic demand for the site was significantly more than this at volumes of approximately 130,330 litres/day associated with the horticultural water demand of the site. The testing of the existing well has yielded 8,000 litres/day, 40% of the 20,000 litres/day upper for unlicensed wells permitted under the Water Abstraction and Impounding (Exemptions) Regulations 2017. The proposed site allocation promoted by this water neutrality report is for the 8.8 hectares of land made up of the following landholdings:</p> <ul style="list-style-type: none"> • 8.7ha WT Lambard • 0.7ha of Elliott Metals site. <p>It proposed to use this 8.8 ha site to meet the 4.6 ha shortfall of employment land that has been identified in the EGA. An assessment has been made in Table 3.1 - Water Demand of Employment Areas, which indicates that the well on the WT Lamb site has enough capacity to provide water supply for the maximum 211 employees that would be located at the industrial estate once developed. The average water consumption for industrial uses is 50 litres/day (Ref 5). At the assumed yield of 8,000 litres/day, the highest B8 use: the Final Mile Distribution Centre would utilise 132% (10,550 litres/day) of the current existing well capacity. Through the introduction of greywater recycling and the rainwater harvesting will make this a water neutral development.</p> <p>Table 3.1 - Water Demand of the Employment Areas</p> <table border="1" data-bbox="1556 678 2004 885"> <thead> <tr> <th>Use Class</th> <th>Property Details</th> <th>Area (m²)</th> <th>Employment Density</th> <th>Full Time Employees (FTE)</th> <th>Daily Water Demand (litres/day)</th> <th>Borehole Utilisation (%)</th> </tr> </thead> <tbody> <tr> <td colspan="7">WT Lamb & Elliott Metals (Total Area 8.8 ha) - 14,780sqm Employment Area on 4.66 hectares</td> </tr> <tr> <td>B8</td> <td>National Distribution Centre</td> <td>14,700</td> <td>95</td> <td>156</td> <td>7,800</td> <td>39.00%</td> </tr> <tr> <td>B8</td> <td>Regional Distribution Centre</td> <td>14,780</td> <td>77</td> <td>192</td> <td>9,600</td> <td>48.00%</td> </tr> <tr> <td>B8</td> <td>Final Mile Distribution Centre</td> <td>14,780</td> <td>70</td> <td>211</td> <td>10,550</td> <td>52.75%</td> </tr> <tr> <td colspan="5">The highest daily water demand is associated with the Final Mile Distribution Centre</td> <td>10,550</td> <td></td> </tr> </tbody> </table> </div> </div>	Use Class	Property Details	Area (m ²)	Employment Density	Full Time Employees (FTE)	Daily Water Demand (litres/day)	Borehole Utilisation (%)	WT Lamb & Elliott Metals (Total Area 8.8 ha) - 14,780sqm Employment Area on 4.66 hectares							B8	National Distribution Centre	14,700	95	156	7,800	39.00%	B8	Regional Distribution Centre	14,780	77	192	9,600	48.00%	B8	Final Mile Distribution Centre	14,780	70	211	10,550	52.75%	The highest daily water demand is associated with the Final Mile Distribution Centre					10,550	
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			<div style="display: flex; justify-content: space-between; align-items: center;">   </div> <p>3.2 Reducing Water Consumption</p> <p>A key driver for the entire development is to deliver a water neutral, holistic and sustainable light industrial complex. This objective translates to all attributes of the development including lower water and energy use and bills. Greywater recycling facilitates the saving of significant amounts of potable water. By utilising the same source of potable water twice by collecting, cleaning and re-using the "greywater" from showers, hand basins and air conditioning units. The cleaned and disinfected water could then be re-used for non-potable uses such as toilet flushing, cleaning and landscape irrigation.</p> <p>The proposed Hydraloop greywater recycling system facilitates the saving of up to 45% of tap water which also translates into a 45% reduction in the discharge of wastewater. Therefore, also saving significant infrastructure costs. The detailed specifications for the Hydraloop H300 and H600 systems are contained in Appendix B. Both systems would facilitate the demand for potable water to be reduced by 20% to 40% on the new industrial estate as highlighted in Table 4.1 below. The 20% and 40% reduction equate to 30 litres/person/day and 40 litres/person/day respectively.</p> <p>Table 4.1 - Percentage of Greywater Recycled</p> <table border="1" data-bbox="772 678 1279 922"> <thead> <tr> <th>Use Class</th> <th>Property Details</th> <th>Area (m²)</th> <th>Full Time Employees (FTE)</th> <th>Daily Water Demand (litres/day) (50l/p/d)</th> <th>Daily Water Demand (litres/day) (40l/p/d)</th> <th>Daily Water Demand (litres/day) (30l/p/d)</th> </tr> </thead> <tbody> <tr> <td colspan="7"><i>WT Lamb & Elliot Metals (Total Area 8.8 ha) - 14,780sqm Employment Area on 4.60 hectares</i></td> </tr> <tr> <td>B8</td> <td>National Distribution Centre</td> <td>14,780</td> <td>156</td> <td>7,800</td> <td>6,240</td> <td>4,680</td> </tr> <tr> <td>B8</td> <td>Regional Distribution Centre</td> <td>14,780</td> <td>192</td> <td>9,600</td> <td>7,680</td> <td>5,760</td> </tr> <tr> <td>B8</td> <td>Final Mile Distribution Centre</td> <td>14,780</td> <td>211</td> <td>10,550</td> <td>8,440</td> <td>6,330</td> </tr> <tr> <td colspan="7"><i>The highest daily water demand is associated with the Final Mile Distribution Centre</i></td> </tr> </tbody> </table> <p>Greywater recycling results in the 40% reduction to the proposed allocation site, resulting in a daily water consumption of 6,330 litres/day for the Final Mile Distribution Centre (Highest Water Demand - Worst Case Scenario).</p>	Use Class	Property Details	Area (m ²)	Full Time Employees (FTE)	Daily Water Demand (litres/day) (50l/p/d)	Daily Water Demand (litres/day) (40l/p/d)	Daily Water Demand (litres/day) (30l/p/d)	<i>WT Lamb & Elliot Metals (Total Area 8.8 ha) - 14,780sqm Employment Area on 4.60 hectares</i>							B8	National Distribution Centre	14,780	156	7,800	6,240	4,680	B8	Regional Distribution Centre	14,780	192	9,600	7,680	5,760	B8	Final Mile Distribution Centre	14,780	211	10,550	8,440	6,330	<i>The highest daily water demand is associated with the Final Mile Distribution Centre</i>						
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By utilising the existing productive well combined with the proposed greywater and rainwater harvesting would allow for the site to be serviced in a very sustainable manner, without being heavily dependent on potable water sources. This is critically important as the development is at the edge of the water neutral zone and in an area experiencing high levels of water stress.

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			<div style="display: flex; justify-content: space-between; align-items: center;">   </div> <p>5.0 Conclusion - A Development Area Achieving Water Neutrality</p> <p>The proposed allocation site consisting of the WT Lamb and Elliott Metals site will utilise greywater recycling in order to drastically reduce the amount of potable water demand. This intervention results in the new water demand associated with the proposed B8 development site being 40% less than that of the proposed light industrial use.</p> <p>This report demonstrates that it is viable to support 14,780 m2 of industrial floor space, based on the consumption of a typical Final Mile Distribution Centre employing 211 full-time members of staff with an average water demand of 10,550 litres per day. Through the use of water neutrality principles, this water demand can be reduced to 6,330 litres per day, by installing greywater recycling technology. Initial well yield tests have indicated that potentially there may be additional yield capacity than the initial 8,000 litres per day that has currently been confirmed on site. It can be therefore concluded that the requirements for water neutrality at the proposed site for allocation are met. Thus, clearly demonstrating the developing/allocating of the site would facilitate a much more sustainable development on this much-needed employment site.</p> <p>Additional well testing together with a detailed hydro-geological prognosis report will be undertaken in order to ascertain the maximum well yield that could be available to the site. It is also noted that the historic demand for the site was at 130,330 litres per day associated with the horticultural water demand of the site, which would suggest that potentially there may be additional yield capacity than the initial 8,000 litres per day that has currently been confirmed on site.</p> <p>The annual rainfall figures for the area is 25,844,390 litres/year. Whilst the current yield of 8,000 litres/day results in an annual yield of 2,920,000 litres/year. However, the annual water consumption from the well for these crops would have been approximately 77,650,000 litres/year (25,100,000 x 3.1). This would result in a significant deficit of 51,805,610 litres/year. Most of which is considered to have been historically supplied by the well, which is currently impeded by detritus, heavy silting and the presence of organic matter. It can be reasonably concluded that there is sound ground to expect much greater yields which could be made available to service the allocated Gatwick Green employment site, together with some other offsite opportunities that may need water offsetting credits.</p> <p style="text-align: right;">REFERENCES</p> <ol style="list-style-type: none"> 1. Irrigation Water Strategy for UK Agriculture and Horticulture (2020), UK Irrigation Association, https://www.rfuonline.com/archive?thead=141830 2. https://www.bigqa.org.uk/news-listing/water-source-if-golf-clubs-banned-from-using-mains.html 3. Water Use and Resilience in the Golf Sector 2020 (January 2020), Environmental Solutions International Ltd, Page 5 4. Meeting our Future Water Needs: A Natural Framework for Water Resources (2020), Environment Agency 5. Water Use in Your Business, https://www.south-staffs-water.co.uk/media/1509/waterusebusiness.pdf

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APPENDIX A - EMPLOYMENT DENSITY GUIDE

Homes & Communities Agency
Guide 2015
Employment density

Use Class	Use Category	Use sub-category	Intensity (sqm)	Notes
B1a Offices	General Office	Corporate	12	N/A
		Professional Services	12	N/A
		Public Sector	12	N/A
		IT/IT	11	N/A
		Finance & Insurance	12	N/A
B1b Call Centres	Call Centres		8	N/A
			8	N/A
B1c Light Industrial	Light Industrial		4-20	High lower densities may be achieved if sites with higher provision of shared or communal spaces
B8 Storage & Distribution	Warehouse & Manufacturing	Warehouse Distribution Centre	36	N/A
		Warehouse Distribution Centre	77	N/A
		Warehouse Distribution Centre	77	N/A
Mixed B Class	Small Business Workplace	Workplace	20-25	B1a, B1c - The density will tend to increase between spaces, as the share of B1a increases as do will employment densities.
		Water spaces	10-40	B1c, B2, B8 - Difference between planned space density and utilisation due to membership model
		Clubs	20-40	B1c, B8
		Co-Working	10-18	B1a - Difference between planned space density and utilisation due to membership model
		Managed Workplace	12-47	B1a, B, C
B11 Retail	Retail	Retail	200-500	
		Retail	200-500	
		Retail	200-500	
B12 Finance & Professional Services	Finance & Professional Services		15-20	N/A
			15-20	N/A
B13 Retail	Retail		10	N/A
			10	N/A
C1 Retail	Retail	Retail	1-2	1.5 per sqm
		Retail	1-2	1.5 per sqm
		Retail	1-2	1.5 per sqm
		Retail	1-2	1.5 per sqm
C2 Fitness Centres	Fitness Centres	Gym	100	N/A
		Gym	100	N/A
		Gym	100	N/A
		Gym	100	N/A
		Gym	100	N/A
D1 Cinema	Cinema		200	N/A
			200	N/A
E1 Visitor & Cultural Attractions	Visitor & Cultural Attractions		20-25	The diversity of the cultural attraction sector means a very wide range exists
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Due to its innovative and breakthrough technology, Hydraloop water is clean, clear, safe and certified and for toilet flushing, washing machine, garden irrigation and/or to top-up a swimming pool.</p> <p>Hydraloop H600</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">H600</td> <td>Input: Greywater from shower and bath Output: Two (2) valves for recycled water to the toilets and the washing machine colour: Green Front Plate: Stainless-steel front plate with white coloured logo and small status light</td> </tr> <tr> <td>H600 Premium</td> <td>Input: Greywater from shower and bath Output: Two (2) valves for recycled water to the toilets and the washing machine choose from three colours: Green, Blue and Purple Front Plate: Premium stainless-steel front plate with Hydraloop LED logo lights</td> </tr> </table> <p>Add-ons</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Output Garden</td> <td>One (1) extra valve for recycled water in the garden</td> </tr> <tr> <td>Output Pool</td> <td>One (1) extra valve for recycled water for the pool</td> </tr> <tr> <td>Lift pump *</td> <td>GIA Novabest 30/300. 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Comments

HYDRALOOP
THE WATER FUTURE

Schematic overview

- input from wastewater of bath & shower
- output for toilet flushing, washing machines, garden irrigation and / or pool
- WiFi connected for Smartphone app, over the air updates and remote support
- 1% E-nergy boundary product
- No filters, membranes or chemicals
- Fully automatic, self-cleaning, low maintenance
- BREEAM and LEED certification points
- No compromise on hygiene and living comfort
- Contribute towards sustainable and off grid living

For more information, please visit www.hydraloop.com

HYDRALOOP
THE WATER FUTURE

FACT SHEET – HYDRALOOP CASCADE



With the scalable and made to measure Hydraloop Cascade system, you can recycle up to 95% of shower, bath and/or handbasin water + the cooling water from air-conditioning units. Due to its innovative and breakthrough technology the maintenance requirements and corresponding costs are very low.

The Hydraloop Cascade can be assembled by configuring two or more Hydraloop units in cascade arrangement. Depending on the building and the application, one central location can be chosen in the building for one cascade configuration. Or several locations with 2 or more compact cascade configurations.

Each Hydraloop unit in the cascade set up works independently in the cleaning process. The treated and disinfected recycled water is stored in one volume which is formed by the interconnected individual water storage tanks of the Hydraloop units. Treatment and storage tanks form one integral cluster. A powerful booster pump distributes the recycled water in the building to be used for toilet flushing and garden irrigation. In case of a temporary shortage of recycled water, the system automatically switches to its back-up water source like tap water or rainwater.






An online information system is available for real-time status information and performance.

EXAMPLE: HYDRALOOP CASCADE 14 DURING 3-MONTH PERIOD

Unit	Unit 01	Unit 02	Unit 03	Unit 04	Unit 05	Unit 06	Unit 07	Unit 08	Unit 09	Unit 10	Unit 11	Unit 12	Unit 13	Unit 14
On-line	On-line	On-line	On-line	On-line	On-line	On-line	On-line	On-line	On-line	On-line	On-line	On-line	On-line	On-line
production capacity	276	409	310	377	428	523	361	548	123	813	889	928	928	928
used	308	418	338	423	503	478	1178	1287	1838	1838	2087	1838	1838	1838

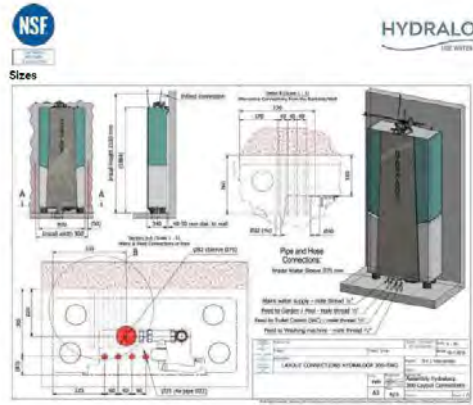
Total 188468 liters water recycled

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			<div style="text-align: center;">    </div> <p>Input Greywater from showers, baths, handbasins (no water from kitchen, kitchenette and sink), cooling water from air-conditioning units. Hydraloop Cascade cannot collect greywater from the washing machine.</p> <p>Output 1 outlet for recycled water for each Hydraloop cascade cluster for toilet flushing and irrigation Stone</p> <p>Colour Stainless-steel front plate with white coloured logo and status light</p> <p>Front Plate</p> <p>Hydraloop Cascade</p> <p>Hydraloop Specifications</p> <p>Treatment capacity Scalable from 1060 liters 280 gallons per day up to 10,600 liters 2800 gallons per cluster</p> <p>Voltage 100 240 Volt, 24 Volt Internal</p> <p>Internet The Hydraloop unit needs to be connected with an internal internet connected (Wi-Fi) network</p> <p>Noise Level Depending on the size of the installation</p> <p>The Hydraloop Cascade consists of several H300 units connected together. The H300 unit is certified to the NSF/ANSI 350 standard.</p> <div style="text-align: center;">   </div> <p>The NSF/ANSI 350 standard verifies that all design and performance requirements of the standard have been met and confirms through testing that effluent reuse water meets the appropriate quality criteria. The NSF/ANSI 350 standard also sets water quality requirements for the collection, treatment and distribution of water.</p> <p>During the 28-week NSF/ANSI 350 testing period, the Hydraloop product was tested daily with a parameter mix that contained raw wastewater, secondary effluent, tap water, greywater, condensation, soap, toilet paper, deodorant, bath cleaning, toilet flush, liquid handwash, laundry detergent & splash, NaOCl, NaOClO₂, H₂O₂ and bleach. The incoming greywater and the treated recycled water was lab-tested for 28 weeks, typically 3 days a week.</p> <table border="1"> <caption>Effluent values of the incoming greywater used for the 28-week test</caption> <thead> <tr> <th>Parameter</th> <th>Required range</th> </tr> </thead> <tbody> <tr> <td>TSS (mg/L)</td> <td>0-148 mg/L</td> </tr> <tr> <td>BOD₅</td> <td>18-270 mg/L</td> </tr> <tr> <td>Temperature</td> <td>15-35 Celsius</td> </tr> <tr> <td>pH (pH)</td> <td>6.5-8.5</td> </tr> <tr> <td>Free-chlorine</td> <td><30-100 mg/L</td> </tr> <tr> <td>Total phosphorus (P)</td> <td>1.0-2.0 mg/L</td> </tr> <tr> <td>Total Ammonia Nitrogen (NH₃-N)</td> <td>3.0-5.0 mg/L</td> </tr> <tr> <td>COD</td> <td>250-400 mg/L</td> </tr> <tr> <td>Total bacteria</td> <td>10⁶-10⁷ cfu/100 mL</td> </tr> <tr> <td>Coli</td> <td>10⁶-10⁷ cfu/100 mL</td> </tr> </tbody> </table> <table border="1"> <caption>Effluent values NSF-350 requirements and Hydraloop treated water test results</caption> <thead> <tr> <th>NSF-ANSI 350 requirements</th> <th>HYDRALOOP average test results</th> </tr> </thead> <tbody> <tr> <td>CBOD₅ (mg/L)</td> <td><10 CBOD₅ (mg/L) 6</td> </tr> <tr> <td>TSS (mg/L)</td> <td><10 TSS (mg/L) 3.3</td> </tr> <tr> <td>Turbidity (NTU)</td> <td>< 5 Turbidity (NTU) 3.3</td> </tr> <tr> <td>E. coli (MPN/100mL)</td> <td><14 E. coli (MPN/100mL) <1</td> </tr> <tr> <td>PH (pH)</td> <td>6.5-8.5 PH (pH) 8.0-8.0</td> </tr> </tbody> </table> <p>For more information, please visit www.hydraloop.com</p>	Parameter	Required range	TSS (mg/L)	0-148 mg/L	BOD ₅	18-270 mg/L	Temperature	15-35 Celsius	pH (pH)	6.5-8.5	Free-chlorine	<30-100 mg/L	Total phosphorus (P)	1.0-2.0 mg/L	Total Ammonia Nitrogen (NH ₃ -N)	3.0-5.0 mg/L	COD	250-400 mg/L	Total bacteria	10 ⁶ -10 ⁷ cfu/100 mL	Coli	10 ⁶ -10 ⁷ cfu/100 mL	NSF-ANSI 350 requirements	HYDRALOOP average test results	CBOD ₅ (mg/L)	<10 CBOD ₅ (mg/L) 6	TSS (mg/L)	<10 TSS (mg/L) 3.3	Turbidity (NTU)	< 5 Turbidity (NTU) 3.3	E. coli (MPN/100mL)	<14 E. coli (MPN/100mL) <1	PH (pH)	6.5-8.5 PH (pH) 8.0-8.0						
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Due to its innovative and breakthrough technology, Hydraloop water is clean, clear, safe and certified and for toilet flushing, washing machine, garden irrigation and/or to top-up a swimming pool.</p> <p>Hydraloop H300</p> <table border="1"> <tr> <td>H300</td> <td>Input: Greywater from shower and bath Output: Two (2) valves for recycled water to the toilets and the washing machine Colour: Stone Front Plate: Stainless-steel front plate with white coloured logo and small status light</td> </tr> <tr> <td>H300 Premium</td> <td>Input: Greywater from shower and bath Output: Two (2) valves for recycled water to the toilets and the washing machine Choose from three colours: Dew, Chili and Stone Front Plate: Premium stainless-steel front plate with Hydraloop LED logo lights</td> </tr> </table> <p>Add-ons</p> <table border="1"> <tr> <td>Output Garden</td> <td>One (1) extra valve for recycled water in the garden</td> </tr> <tr> <td>Output Pool</td> <td>One (1) extra valve for recycled water for the pool</td> </tr> <tr> <td>Washing Machine Option</td> <td>Option to recycle 50% of greywater from washing machine, including sanitary lift pump</td> </tr> <tr> <td>Lift pumps *</td> <td>DAB Novabox 30/300. This lift pump is submerged underneath the floor DAB Genix VT 030. This lift pump is on the floor</td> </tr> </table> <p>* Lift pump is only necessary if Hydraloop is positioned on the same floor or a storey higher as the shower/bath/tub</p> <p>Hydraloop H300 Specifications</p> <table border="1"> <tr> <td>Volume</td> <td>300 liters/80 gallons</td> </tr> <tr> <td>Cleaning capacity</td> <td>530 liters/140 gallons per day</td> </tr> <tr> <td>Dimensions</td> <td>80 cm wide, 34 cm deep, 187 cm high 31.5" wide, 13.4" deep, 74" high</td> </tr> <tr> <td>Voltage</td> <td>100/240 Volt, 24 Volt Internal</td> </tr> <tr> <td>Usage</td> <td>20 warts during treatment. Average power consumption: 200kWh/year</td> </tr> <tr> <td>WIFI</td> <td>The Hydraloop unit needs to be connected with an internal WIFI-network</td> </tr> <tr> <td>Average recycled water quality</td> <td>non-potable water CBOD₅ (mg/L) < 10 TSS (mg/L) < 5 Turbidity (NTU) < 5 E. coli (MPN/100mL) < 14 PH (pH) 6.5-8.5 ± 44 dB</td> </tr> <tr> <td>Noise Level</td> <td></td> </tr> </table> <p>LED Light Indications</p> <table border="1"> <tr> <td>White</td> <td>Hydraloop provides recycled water.</td> </tr> <tr> <td>Blue</td> <td>Hydraloop provides mains water (until recycled water becomes available).</td> </tr> <tr> <td>Purple</td> <td>The washing machine mode is active.</td> </tr> <tr> <td>Green</td> <td>In self-cleaning mode.</td> </tr> <tr> <td>Orange + two (2) short sound signals per minute</td> <td>The UV disinfection lamp is not functioning properly.</td> </tr> <tr> <td>Red + three (3) short sound signals/minute</td> <td>The water distribution pump has switched itself off. 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Schematic overview



Parameter	Specification
Dimensions	440 x 170 x 440 mm
Weight	10 kg
Material	ABS, PP, PVC
Temperature	5°C - 35°C
Pressure	0.5 - 1.5 bar
Flow rate	1.5 - 2.5 l/min
Power consumption	12 W (typical)
Water output	100 l/day
Water quality	100% safe for drinking
Warranty	2 years

For more information, please visit www.hydraloop.com

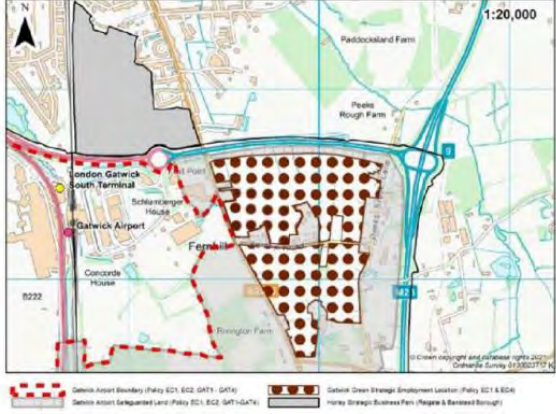


Suggested Modifications:

CHANGES REQUIRED IN ORDER TO ENSURE THAT THE PLAN IS COMPLIANT WITH NPPF 67. As we have indicated we are supportive of the allocation of Gatwick Green as a strategic employment allocation under policy EC4. However, as set out in our representations in respect of Policy EC1 we consider that there is a significant under estimation of the amount of land requirement for employment purposes during the plan period. We have set out the change in respect of the strategic policy that we believe is required in order to make the plan sound in particular it requires that a minimum of 34ha of employment land is required over the course of the Plan period.

68. Aside from providing the required employment land, the addition of our clients land to the allocation would allow for a more comprehensive development scheme. The value of this method is in line with national design

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			<p>guidance and was recognised by TWG regulation 18 consultation submission. By approaching the area in a comprehensive manner would allow the overarching ambitions and high quality aspirations to be achieved, in simple terms approaching the area in a comprehensive rather than piecemeal way would allow for the proper planned approach. This would be done over a time frame envisaged by NPPF for strategic sites such as Gatwick Green.</p> <p>69. Our clients confirm that they would be happy to work with TWG and the Council in order to ensure a comprehensive approach to the master planning of the site. In this regard they would be willing to enter into a Statement of Common Ground with TWG to confirm their commitment to joint working, collaboration and delivery. 70. It is considered therefore that in order to make the plan sound, two changes are required.</p> <p>1. The proposals map for Policy EC4 should be redrawn as below to include land within our clients control:</p>  <p>2. The policy wording of Strategic Policy EC4: Strategic Employment Location should be amended under the heading “Employment Uses” to read:</p> <ol style="list-style-type: none"> provide as a minimum 34ha of new industrial land and warehousing land including for B8 storage and distribution along with smaller scale general industrial land to meet local needs, demonstrating through appropriate evidence the justification for any further industrial floorspace beyond this amount; 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.

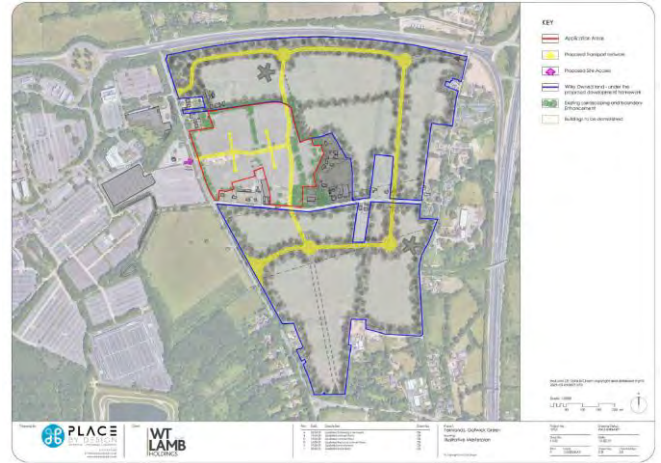
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Appendix 1: Red Line Plan



Appendix 2: Illustrative master plan



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REP/035 (2023)	Vail Williams on behalf of Ardmore Ltd	EC4	<p>Strategic Policy EC4: Strategic Employment Location</p> <p>Gatwick Green was promoted and not allocated in the 2015 local Plan. Para 81 of the 2015 Examination Inspector's report confirmed that, <i>"identifying Gatwick Green now would pre-empt a decision about the location of a strategic employment site. At this stage it is appropriate that the Council leaves all options open, including the potential selection of land to the north of Manor Royal, pending the review of the Plan following the second runway decision. For this reason, I do not accept the suggestion that a reserve site should be identified. The Council has gone as far as it can by identifying areas of search; to do anything more would be premature and could involve abortive work."</i></p> <p>In Policy EC4, the Gatwick Green Strategic Employment Location is allocated for 77,500 square metres (sqm) gross floor area, or 57.8 hectares of development. TWG's consultation response to the SA confirms that the group own over 63 hectares of land.</p> <p>As stated above, the proposed Gatwick Green employment land allocation is located within the identified safeguarding land (as per the adopted 2015 Local Plan) and is inconsistent with the cited 2019 GAL Masterplan that restricts other such developments within the safeguarded area. The 2019 Masterplan by GAL indicates that the area is required for airport related parking. As we understand it GAL also objects to the policy ST4.</p> <p>We submit that this allocation, is unjustified and ineffective and that the location and scale of the strategic employment allocation is unsustainable and unsound.</p> <p>The complex nature of allocating Gatwick Green is reflected by the detail of policy of EC4 which requires 22 criteria to be met to address numerous constraints to development of the land for employment uses. The contentious nature of the allocation is also set out further in the councils own Topic Paper 2.</p> <p>Para 2.1.4. explains that <i>"Policy GAT3, Gatwick Airport Related Parking, which restricts additional or replacement parking, where there is demonstrable evidence of need, to within the airport boundary, received particular scrutiny at the Examination into the 2015 Local Plan. In his report, concluding that Policy GAT3 is sound, the Local Plan Inspector endorsed the policy approach, observing in para. 88 that "there is obvious logic to the argument that car parks close to the terminals will minimise the length of car journeys for most people, and that on-airport provision is therefore a more sustainable option.... Furthermore, given the scarcity of land in Crawley and the available capacity at the airport, there is a strong argument that the priority for land which becomes available outside the airport should be a more productive use such as housing or employment"</i>.</p> <p>Para 2.1.5 confirms that <i>"the Local Plan approach in Policy GAT3 was subsequently challenged at the High Court"</i>. Whilst the Judicial Review challenge failed and the Local Plan was subsequently adopted, Topic Paper 2 highlights the need to retain car parking within the airport boundary, and this is further endorsed by Local Plan Review Policy GAT3.</p>

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			<p>Topic Paper 2 also confirms the latest position in relation to the s106 Agreement between Gatwick Airport Limited (GAL), West Sussex County Council (WSCC) and Crawley Borough Council (CBC) signed in May 2022. This agreement 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.</p> <p>For context detailed guidance for the airport was set out in the Gatwick Airport Supplementary Planning Document (SPD) 2008 which is now very outdated. CBCs January 2023 Local Development Scheme states that the SPD will be updated post the Local Plan Review adoption. We submit that any employment land allocation at Gatwick Green is inconsistent with adopted and proposed local plan policy and guidance, and conflicts with other airport-related policies such as updated GAT 1 and GAT3 of the Local Plan Review.</p> <p>Policy EC4 states that any application for the allocation will need to be supported by an Impact assessment on how Gatwick Green will ensure its offer is complementary to the mixed use business function of Manor Royal, and HOR9 at Horley and other strategic employment locations in the functional market area. However, we submit that an allocation for the size and scale of the proposed Gatwick Green is neither sustainable nor sound, will not be effective and is not justified. In particular, the proposed allocation is separate from and poorly located to Manor Royal, the pre-eminent employment location in the borough – which is demonstrably highly effective as a mixed use multi-functional area.</p> <p>The physical separation and distance to Manor Royal means that, as the SA confirms, Gatwick Green is “a <i>stand-alone</i>” location, with evident and serious limitations. The proposed allocation would have an adverse impact in terms of the lack of physical connectivity with local neighbourhoods, local work force and cycle and pedestrian links and the consequent traffic generation, and lack of physical connectivity with local neighbourhoods, local workforce and cycle and pedestrian links can be seen to adversely affect the character and function of Manor Royal which under EC3 is stated as the Boroughs Main Employment Area. We submit EC4 is therefore inconsistent with Policy EC3. With the allocation not being connected to local neighbourhoods, we also believe that this will be likely to increase in-commuting, further exacerbating local skills shortages and increasing traffic pressures on the existing road network.</p> <p>The poor location of the Gatwick Green site was also the subject of other representations at previous consultations of the Local Plan Review, yet the council has still sought to allocate the land and have rejected other more sustainable locations adjacent to the boundary with Manor Royal.</p> <p>The council’s SA states that under objective 1 on climate change and mitigation: “<i>The Gatwick Green site is however somewhat separated from Crawley’s other Main Employment Areas and Established Residential Areas, potentially increasing the need to travel by private vehicle, whilst the storage & distribution-led nature of operations will lead to an increase in HGV traffic movements. In this regard, other employment sites promoted</i></p>

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			<p><i>through the Local Plan process would be more sustainable options, including those adjacent to Manor Royal, but these cannot be progressed due to the requirement to retain safeguarding and the fact that these other sites are situated on land that is potentially required to accommodate the physical land take of a southern runway, road diversions and other operational uses” (emphasis added). We agree. The Gatwick Green site is plainly less well-related and connected to the local area and, in particular, the existing, demonstrably effective, employment land at Manor Royal at a Main Employment Area, promoted by EC3.</i></p> <p><i>In addition, Objective 7 promoting sustainable journeys the council confirm that Gatwick Green “is however relatively isolated from Crawley’s other Main Employment Areas and established residential neighbourhoods, potentially increasing the need to travel by private vehicle. The storage & distribution-led nature of operations will inevitably lead to an increase in HGV traffic movements. Other sites that have been promoted for employment, particularly those adjoining Manor Royal, are more sustainably located but these cannot be progressed due to the requirement to retain safeguarding”.</i></p> <p>As part of the Jersey Farm Project Team, Connect Consultants has reviewed the “<i>Crawley Transport Study: Transport Study of Strategic Development Options and Sustainable Transport Measures: Draft Crawley Local Plan 2021 – 2037</i>” by Stantec (dated December 2020). Revision E of the Stantec report, dated 23 June 2022, was published as part of CBC’s evidence base for public consultation in May 2023. Connect has also reviewed the SYSTRA report “<i>Crawley Western Link Road – Northern Section Study</i>”, dated March 2023.</p> <p>Using the most up-to-date traffic modelling data from the CBC Local Plan evidence base, purchased from CBC/Stantec in June 2023, Connect Consultants have undertaken a review of the traffic impact of the Gatwick Green site. In addition, please see attached Connect Consultants’ ‘Technical Note 07 – Jersey Farm Traffic and Transport Technical Note’, dated June 2023. The Gatwick Green site is estimated to generate 333 two-way trips in the AM peak and 298 two-way trips in the PM peak. There are impacts predicted on the B2036 Balcombe Road for most of its length both North and South of the B2037 Antlands Lane junction with Balcombe Road. These impacts are greater in the PM peak than in the AM peak.</p> <p>A significant proportion of these trips are freight/HGV traffic that cannot be replaced by active modes or public transport. The modelling has assumed that there will be an element of car trips for employees working at the site and these would respond to sustainable mitigation measures.</p> <p>Overall, the residual Gatwick Green trips assumed to impact the network are 312 two-way trips in the AM peak and 281 trips in the PM peak.</p> <p>During the AM peak, 67 two-way trips are predicted to use the northern sections of Balcombe Road through Horley and beyond, while 245 two-way trips are predicted to use the southern sections of Balcombe Road and</p>

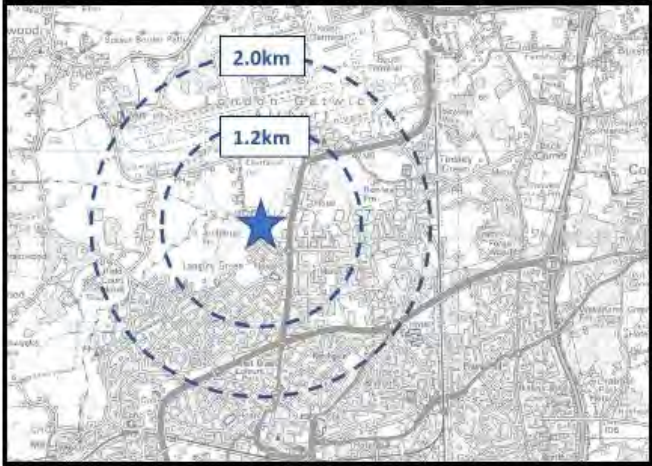
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			<p>beyond. Around 68 two-way trips are predicted to use the rural routes east of the site, including Shipley Bridge Lane through Copthorne en-route to the motorway junction and Effingham Road to/from East Grinstead.</p> <p>The M23 junction 10 is predicted to be used by 55 of the Gatwick Green trips in the AM peak; none are predicted to use junction 9.</p> <p>During the PM peak, 65 two-way trips are predicted to use the northern sections of Balcombe Road through Horley and beyond, while 216 two-way trips are predicted to use the southern sections of Balcombe Road and beyond. Around 40 two-way trips are predicted to use the rural routes east of the site, including Shipley Bridge Lane through Copthorne en-route to the motorway junction and Effingham Road to/from East Grinstead; around the same number are predicted to use the southern part of Balcombe Road.</p> <p>The M23 junction 10 is predicted to be used by around 40 of the Gatwick Green trips in the PM peak; none are predicted to use junction 9. These predicted traffic flows to/from Gatwick Green are shown graphically on maps at Appendix 7 of the Connect report TN-07. These clearly show the impact of the traffic on the surrounding local roads. To mitigate the impacts of the Gatwick Green traffic on the surrounding local roads and lanes, an HGV ban is proposed for traffic heading to Gatwick Green from the north on Balcombe Road to prevent this traffic travelling through the built-up area in Horley.</p> <p>A right-turn ban is also proposed for HGV traffic egressing the site, to prevent this traffic using the northern sections of Balcombe Road thus mitigating the adverse impacts of this HGV traffic, including noise and air pollution.</p> <p>A committed/planned new link road between the A2011 and Balcombe Road, designed to improve the access route to the Northeast Sector developments, is shown to have capacity problems in the Reference Case and the Local Plan scenarios, even after the proposed sustainable travel mitigation is applied.</p> <p>Clearly, there are concerns and issues raised by CBC themselves in Policy EC4 regarding the Gatwick Green freight traffic using the local roads and lanes, and with Gatwick Green traffic generally on the surrounding road network.</p> <p>With this fact clearly acknowledged by CBC, and with the evident need for physical interventions to protect the local roads from the impact of HGV traffic, we contest that the location of the strategic employment site at Gatwick Green is the correct location and is therefore unsound and unjustified in regard to Policy ST1, ST3, CL3 and EC3.</p> <p>Proposed Policy ST1 relates to sustainable transport, and the reasoned justification explains the requirement for developments to use Travel Plans and Mobility Strategies to first reduce overall travel demand and second to minimise mode share by private car. The proposed strategic employment site at Gatwick Green does not benefit from the ready-made sustainable travel infrastructure inherent at the pre-eminent employment district of Manor</p>

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			<p>Royal. The strategic traffic modelling of the evidence base demonstrates that little can be done to replace the traffic movements by active modes or public transport, and for this reason the location of the proposed Gatwick Green employment site is inconsistent with Policy EC3 and ST1.</p> <p>Proposed Policy ST3 relates to improving the existing rail station in the borough, which we fully support. However, the Gatwick Green site, which is only c.1km (straight line distance) from Gatwick rail station, has only one existing bus route connecting the two. The 422 bus route serves a pair of stops on Antlands Lane, once per hour during the peak periods, and the journey time to Gatwick station is approximately 12 minutes.</p> <p>The existing bus routes which serve the Manor Royal Business District (the 4, 5, and 100 routes) connect to both Crawley Station and Three Bridges Station, with a combined seven services an hour during the peak periods, with a journey time of c.11 minutes to Crawley Station and c.22 minutes to Three Bridges Station, and therefore employment development would be more sustainable if forming part of an extension to the existing Manor Royal Business District complying with EC3.</p> <p>Regarding infrastructure provision, we strongly disagree that policy EC4 is robust and sound, particularly as it is underpinned by the SA which, under objective 8: providing sufficient infrastructure, treats Gatwick Green differently regarding safeguarding. <i>“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. This represents the most appropriate site within Crawley that can be allocated for strategic employment growth without prejudicing the possible delivery of a southern runway at Gatwick Airport”.</i></p> <p>Under Objective 5: maintain and support employment: the SA states that <i>“The allocation of an industrial-led Strategic Employment Location at Gatwick Green will address a long-standing need for new employment land, specifically within the B8 storage & distribution sector in Crawley. This would support and complement Crawley’s existing business offer, particularly that of Manor Royal, and the allocated office led Horley Strategic Business Park. The provision of new strategic employment land would support sustainable economic growth in Crawley and that of the wider Gatwick Diamond, attracting new business and facilitating the expansion of existing businesses which have been frustrated by a lack of available space, particularly within the B8 use class. This offers scope for complementarity with Manor Royal, helping retain its existing mixed-use business function which is coming under significant pressure from the demand for B8 floorspace. Allocation of a Strategic Employment Location therefore presents a significant opportunity to accommodate the business needs of Crawley, in a manner that does not prejudice the physical land take required to accommodate a possible southern runway at Gatwick Airport, supporting Crawley’s role as the leading employment destination in the Gatwick Diamond.”</i> For the reasons set out above, we do not agree and consider the SA on Gatwick Green that underpins policy EC4 is flawed in its assessment, meaning the policy is unsound.</p>

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			<p>Many of the policy criteria in EC4, such as the requirement to provide a high-quality public realm, BREAAAM and the function of the buildings, setting, character, noise etc, can be achieved elsewhere, further emphasising the unsustainability of the proposed allocation, particularly compared to Manor Royal as the Main Employment Area to the Borough.</p> <p>The fact that only 13.73 ha of land is considered suitable for development of the 55 hectares, or 63 hectares controlled by TWG, within the allocation, is inconsistent with polices including CL3 and CL8 that seek efficient use of land in more urban areas, and the countryside location means the land will require a significant degree of landscape mitigation given its location.</p> <p>The policy itself notes that a mobility strategy and provision of links must be provided and agreed, given its location to ensure links with existing neighbourhoods. With other locations on the edge of neighbourhoods and Main Employment Areas this is already established, and Manor Royal can build on the successful transport strategies and connectivity, projects already in place and that will form part of the BID3 programme & projects pack. We therefore submit that the proposals are not aligned with sustainable transport polices ST1 and ST2 or the aim to support amenities within 20 min walking, within Manor Royal nor the council's own adopted LCWIP.</p> <p>Policy EC4 states that the site will be allocated for B8 uses. We consider that the market signals indicate that a more mixed-use allocation for any strategic employment location would be more suitable and sustainable therefore should provide more SME opportunities and amenity facilities than large B8 led distribution sheds (see market commentary under policy EC1 below). The proposed allocation will not sustainably diversify the local economy and fails to complement Manor Royal.</p> <p>We note that there are also significant transport and infrastructure requirements associated with the allocation at Gatwick Green that would be inconsistent with transport policies proposed in the Local Plan Review. In the first instance airport related car parking will be lost which will need to be replaced. In addition, significant highway mitigation will also be required. Whilst we will address these further in a later section under transport, it is evident that in order to mitigate the impacts an HGV ban is proposed for traffic heading to/from Gatwick Green from the north on Balcombe Road, to prevent this traffic travelling through the built-up area in Horley.</p> <p>A further a right turn ban is also proposed for HGV traffic egressing the site, to prevent traffic using the northern sections of Balcombe Road, to mitigate the adverse impacts of Gatwick Green's HGV traffic, including noise and air pollution.</p> <p>The Stantec Transport Study states in para 7.8.1 "<i>Gatwick Green is the main site proposed for employment in the Crawley Local Plan update. This development is the main addition between the modelled Scenario 2 when compared to Scenario 1. The development is estimated to generate 333 two-way trips in the AM peak and 298 two-way trips in the PM peak. Being 70% B8 land use and 30% B2, a significant proportion of these trips will be</i></p>

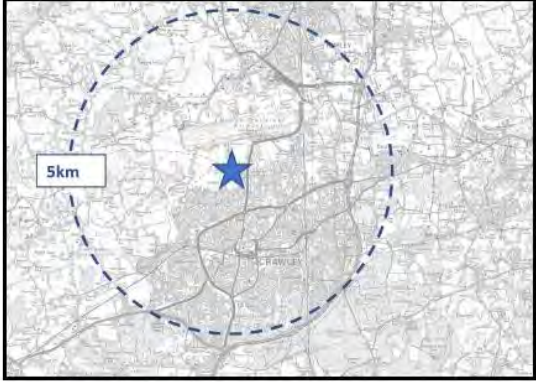
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			<p><i>freight/HGV traffic and therefore cannot be shifted to active modes or public transport. It is assumed that a proportion of employees working at the site would use the sustainable mitigation measures.”</i></p> <p>We contest that material modal shift would be possible, given Gatwick Green’s location. Indeed, the report itself states that most of the traffic generation from the B8 led development cannot be mitigated.</p> <p>We concur with Stantec’s statement that the majority of the Gatwick Green traffic cannot be mitigated by sustainable travel interventions, as would be the case for any other B8 / B2 employment site. However, with this fact clearly acknowledged by CBC, and with the evident need for physical interventions to protect the local roads from the impact of HGV traffic, we contest that the location and scale of the strategic employment site at Gatwick Green is sustainable.</p> <p>We therefore submit the allocation at ST4 is contrary to SD1, transport policy ST1 and believe the “<i>uncertain</i>” score given to objective 7 on promoting sustainable journeys in the SA for Gatwick Green is incorrect and a negative score should be cited.</p> <p>Conclusion:</p> <p>We are grateful for the opportunity to comment as part of this Regulation 19 Local Plan Review. For the reasons set out above, we consider the Local Plan Review and the Sustainability Appraisal are unjustified, ineffective, contrary to national policy and therefore unsound. In particular:</p> <ul style="list-style-type: none"> • Economic Growth and employment policies EC1, EC2, EC3, EC4 and EC5; • Gatwick policies GAT2 and GAT3; • Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link; • more general policies relation to Sustainable Transport ST1 and ST2, Sustainable Development SD1, Water Neutrality Policy SDC4; and • CL3 on Character Landscape and Form, and CL8 Development Outside the Built Up Area Boundary CL8. <p>We wish to participate in the Examination Hearings in relation to the policies identified above and look forward to hearing from CBC in due course regarding formal submission to PINS.</p> <p>Technical Note:</p> <p>1.0 Introduction and Context</p> <p>1.1 Crawley Borough Council (CBC) is currently consulting on its Draft Local Plan (Regulation 19 consultation).</p> <p>1.2 Connect Consultants has been instructed to consider the traffic and transport aspects of a site which could potentially be allocated for development as a strategic employment site within the Crawley Local Plan.</p> <p>1.3 The site is on land to the north of Crawley and adjacent to Manor Royal, known herein as Jersey Farm.</p>

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			<p>1.4 The site comprises approximately 20 hectares of largely undeveloped greenfield land, located south of Gatwick Airport and northwest of the Manor Royal employment zone on the north side of Crawley.</p> <p>1.5 The site lies partially within the Gatwick Safeguarded Land (CBC Local Plan Policy GAT2), and partially within the Indicative Search Corridor for a Crawley Western Multi-Modal Transport Link (CWMMTL) (CBC Local Plan Policy ST4) [previously known as the Crawley Western Link Road (CWLR)] which passes approximately east-west through the site.</p> <p>1.6 The Local Plan evidence base is supported by strategic traffic modelling undertaken by Stantec on behalf of CBC. The “Crawley Transport Study: Transport Study of Strategic Development Options and Sustainable Transport Measures: Draft Crawley Local Plan 2021 – 2037” by Stantec (dated December 2020).</p> <p>1.7 Revision E of the Stantec report, dated 23rd June 2022, was published as part of CBC’s evidence base for public consultation in May 2023.</p> <p>1.8 The report states that all three of the local plan scenarios which are modelled include 2,095sqm of B8 use on Land at Jersey Farm (Site A), which is not included in the Reference Case scenario.</p> <p>1.9 Planning permission exists within the site for a unit of approximately 1,780sqm (gross external area) for B8 use, accessed off the northwest end of County Oak Way.</p> <p>1.10 The Jersey Farm site would be offered as an employment site comprising a mix of office, light industry, and warehousing/distribution land-uses in buildings of various sizes, as an extension to the existing Manor Royal employment zone.</p> <p>1.11 For the purposes of the traffic assessment herein, the proposed Jersey Farm development is assumed to not exceed the following quanta:</p> <ul style="list-style-type: none"> • 48,150sqm Warehousing. • 4,070sqm Industrial/Business uses. <p>1.12 An initial illustrative site masterplan is provided at Appendix 1.</p> <p>1.13 Connect Consultants engaged in a formal pre-application enquiry with the Local Highway Authority (LHA) West Sussex County Council (WSCC) via a video-meeting on 16th June 2021. The advice received from WSCC following that meeting has been used to guide the next stages of work, which are set out within this Technical Note (TN).</p>

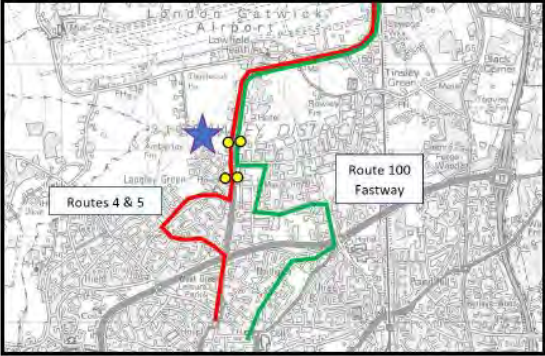
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			<p>2.0 Site Access Arrangements</p> <p>2.1 The site benefits from an existing access route via County Oak Way, providing vehicle and non-vehicle access, and from Public Rights of Way connecting the site to County Oak Lane / Whitworth Road, and to the A23 London Road.</p> <p>2.2 The site also benefits from approximately 120m of its eastern boundary lying congruent with the public highway on the western side of the A23 London Road, opposite the junction of the A23 with Hydehurst Lane.</p> <p>Pedestrian Access</p> <p>2.3 The Institute of Highways and Transportation (IHT) guidance document titled 'Providing for Journeys on Foot' identifies a maximum walk distance of 2.0km for commuter, school and sightseeing walk trips, 800m for town centre walk trips and 1.2km for trips elsewhere.</p> <p>2.4 The approximate 2.0km commuter walk catchment and the 1.2km catchment, based on an 'as the crow flies' distance from the approximate centre of the Jersey Farm site, are shown at Figure 2.1.</p> <p>Figure 2.1 – 1.2km and 2.0km Walk Catchment</p>  <p><i>Map source: Bing / Ordnance Survey. Site is denoted by a blue star.</i></p> <p>2.5 Figure 2.1 indicates that the residential areas of Langley Green, Ifield, and West Green lie within the 2km walk-commute catchment, comprising a resident population of approximately 17,000. To the east of the site, the</p>

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			<p>walking catchments include the adjoining County Oak Retail Park, and also the Manor Royal business quarter and Northgate area.</p> <p>2.6 The Jersey Farm site benefits from Public Rights of Way connecting the site to County Oak Lane / Whitworth Road, and to the A23 London Road. It has direct access to the existing network of pedestrian footways and road crossings within the County Oak and Manor Royal areas, and therefore has ready-made pedestrian connections between the site and the surrounding areas, including residential areas and other employment and retail land uses.</p> <p>2.7 The site is located within the CBC corridor of search for the CWMMTL which would connect the site to major new residential areas to the south-west, which could be as close as 1.6km to Jersey Farm. The delivery of the CWMMTL would bring with it a dedicated pedestrian and cycling route, thereby providing a direct link between Jersey Farm and significant new residential areas.</p> <p>2.8 The Jersey Farm site provides realistic opportunities for future employees and visitors to travel on foot.</p> <p><u>Cycle Access</u></p> <p>2.9 The 2019 National Travel Survey identified average journey lengths by cycle in England of c.5.3km. This suggests that cycling can offer a realistic alternative to car travel, particularly for trips of less than approximately 5km.</p> <p>2.10 Cycling has the potential to play an important part in sustainable travel to and from the proposed development for visitors and staff.</p> <p>2.11 Using 5km as an indicator of the national average cycling distance, the approximate cycle catchment of the Jersey Farm site is shown at Figure 2.2 below.</p> <p>2.12 The 5km cycle catchment includes the majority of Crawley to the south and southeast, all of Gatwick Airport, and the southern portion of Horley, to the north. This comprises a total resident population of approximately 120,000 within the 5km catchment.</p> <p>2.13 The 5km cycle catchment encompasses a significant local population within cycle distance of the site, and with direct access to the existing network of cycle routes and infrastructure within Manor Royal and wider Crawley, there are real opportunities for future employees and visitors to travel by bike.</p> <p>2.14 The future delivery of the CWMMTL would bring with it a dedicated pedestrian and cycling route, thereby providing a direct link between Jersey Farm and significant new residential areas.</p>

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			<p data-bbox="712 288 965 308">Figure 2.2 – 5km Cycle Catchment</p>  <p data-bbox="712 707 1037 722"><small>Map source: Bing / Ordnance Survey. Site is denoted by a blue star.</small></p> <p data-bbox="701 751 842 775">Bus Access</p> <p data-bbox="701 783 2024 871">2.15 The closest bus stops to the Jersey Farm site are on London Road adjacent to the site’s eastern boundary. These are served by regular and frequent buses on Routes 4 and 5 (providing four buses per hour), and the 100 Fastway service (providing three buses per hour).</p> <p data-bbox="701 890 2018 978">2.16 There is also a bus stop located on County Oak Way, adjacent to the Retail Park, which is also served by buses on Routes 4 and 5. This stop is approximately 500m from the southern boundary of the Jersey Farm site, accessible on foot via County Oak Way and via Whitworth Road / County Oak Lane.</p> <p data-bbox="701 997 1469 1021">2.17 These bus stops and routes are shown in Figure 2.3, below.</p>

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			<p data-bbox="705 284 929 303">Figure 2.3 – Bus Routes Map</p>  <p data-bbox="705 673 1041 689"><i>Map source: Bing / Ordnance Survey. Site is denoted by a blue star.</i></p> <p data-bbox="705 718 2016 805">2.18 The Crawley Growth Programme includes improvements to bus infrastructure within the Manor Royal area, aimed at enhancing and promoting bus travel. The plans include replacing the existing bus stop on County Oak Way with two new stops nearby on London Road.</p> <p data-bbox="705 821 2016 909">2.19 The future delivery of the CWMRTL would bring with it bus lanes in both directions, providing a connection between the Jersey Farm site and the major new residential areas to the west. The Jersey Farm masterplan is capable of providing bus stops within the site, with interconnectivity with the on-site pedestrian network.</p> <p data-bbox="705 933 2016 1021">2.20 The bus stops could be exemplar ‘superhubs’, with all-round weather protection, bartype work station with charging points, CCTV, lighting, landscaping/planting/green roof, electric scooter/bike docks, adjacent coffee shop etc.</p> <p data-bbox="705 1045 907 1069"><u>Vehicular Access</u></p> <p data-bbox="705 1077 2016 1165">2.21 The Jersey Farm proposal is that vehicle access will be solely via a new priority controlled (give-way) left-in-left-out (LILO) junction connecting the site access road to the east side of the A23 London Road. Vehicular access will not be permitted via the County Oak Way access.</p> <p data-bbox="705 1181 2016 1268">2.22 The design of the new LILO junction on the A23 London Road has been informed by traffic modelling, capacity testing, and swept-path tracking of the largest vehicles expected to use them, and has been subject to a Stage 1 Road Safety Audit (RSA).</p> <p data-bbox="705 1284 2016 1348">2.23 The proposed design of the Jersey Farm LILO junction is provided at Appendix 2, which shows the swept-path tracking of a 16.5m articulated truck.</p>


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			<p>2.24 The length of deceleration lane is limited by the available land within the Jersey Farm promotor's control. The deceleration lane length is consequently one step below the DMRB standard for a 120kph road which is considered acceptable in this instance because the junction location is only c.60m past the derestricted speed signs (derestricted from 40mph), and northbound vehicles will generally not be up to speed having just left the Fleming Way roundabout.</p> <p>2.25 The RSA considered the highway safety of the proposed junction design and concluded that the audit team were unable to identify any areas of concern regarding highway road safety. The RSA Report is provided at Appendix 3.</p> <p>3.0 Crawley Western Link Road – Northern Section Study</p> <p>3.1 CBC has commissioned SYSTRA to undertake a study into the area of search corridor for the northern section of the CWMMTL (the section of the CWMMTL between Charwood Road and the A23 London Road).</p> <p>3.2 The Jersey Farm site lies within this section.</p> <p>3.3 The SYSTRA report sets out the design criteria for the CWMMTL as follows:</p> <ul style="list-style-type: none"> • All-purpose dual carriageway multi-modal link inclusive of one traffic lane and one bus lane' in each direction; • 70kph design speed (40mph speed limit) which may be reduced to meet surroundings' requirements i.e. County Oak Industrial Area; • Each carriageway 7.3m wide consisting of two 3.65m wide lanes, one lane for general traffic and one for public transport; • 2m central median is provided between the carriageways; and • 3m planting strip, 2.5m walking infrastructure, and 3.5m cycling facilities provided on each side of the carriageway. <p>3.4 The SYSTRA study divides the northern section of the CWMMTL route into three parts. It considers a total of 19 options for the route of the eastern end of the CWMMTL northern section, including two options which pass through the Jersey Farm site. These are named Option ES3 and ES3a, which are described at paragraphs 5.3.5 and 5.3.6, respectively, of the SYSTRA report.</p>

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Option ES3

5.3.5 Option ES3 has been developed to explore an alignment which can be introduced before (if) Gatwick expands. This option is proposed because it could be several decades before Gatwick needs to bring forward a southern runway, if it ever does so. ES3 doesn't require any commercial buildings to be removed but it encroaches into the safeguarded land by about 155m. This option provides a consistent Optimal cross-section (see Figure 7), it doesn't affect the existing bridleway or road network and it ties-in with London Road at Hydehurst Lane which has been identified as the preferred location and which match the new roundabout location proposed in the GAL Masterplan.




Source: Crawley Western Link Road – Northern Section Study, SYSTRA, March 2023

3.5 Option ES3, as shown in the extract above, is the most closely-aligned of the 19 route options to that which is proposed in the Jersey Farm masterplan. The report acknowledges that there are clear benefits to this route option, but with a caveat that it encroaches into the safeguarded land by c.155m. It is not clear what the 120m annotation refers to in the extract above.

Option ES3a

5.3.6 Option ES3a is similar to ES3 with the difference that part of the public transport would be diverted along County Oak Way to provide connectivity with the retail area. In the long term, should Gatwick southern expansion take place, the public transport infrastructure will be maintained along County Oak Way but the general traffic lanes to the north will be removed and replaced with the Gatwick access plan. As per ES3, ES3a provides a consistent Optimal cross-section (see Figure 7) for the norther and western arm whilst also tying into Hydehurst Lane and not affecting the bridleway. However, this option diverts part of the public transport onto County Oak Way (with a similar cross-sections to the existing County Oak Way) therefore affecting the existing road network.



Source: Crawley Western Link Road – Northern Section Study, SYSTRA, March 2023

3.6 This route option is very similar to that shown in the Jersey Farm masterplan, but with the public transport route diverting along County Oak Way, which has width constraints.

Stakeholder Engagement and Option Sifting

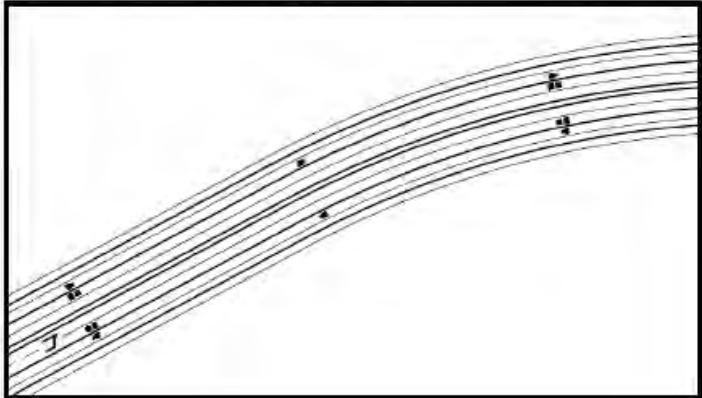
3.7 The SYSTRA report states that the route options were discussed with the following stakeholders:

- Crawley Borough Council
- Environment Agency
- Gatwick Airport Limited

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			<ul style="list-style-type: none"> • Homes England • Horsham District Council • West Sussex County Council. <p>3.8 The SYSTRA report states that only GAL raised concerns, requesting that options ES3 and ES3a should be sifted-out. However, these two options were retained for further analysis due to their substantial benefits over the alternative options.</p> <p>3.9 The relevant extract from the SYSTRA report is provided below.</p> <div data-bbox="712 549 1480 831" style="border: 1px solid black; padding: 5px;"> <p>6.3.3 GAL also requested that Route Options ES3 and ES3a should be sifted out. Sifting of these two options was given substantial consideration. It is known that their alignments would likely encroach into the operational area of potential Gatwick Airport southern runway. However, when considered alongside the alternative Eastern Section options, it was felt that there were substantial benefits to these two route options which warranted their retention at the sifting stage to analyse their pros and cons during the MCA analysis stage.</p> <p>6.3.4 It is worth noting that some of the other remaining live Options (WS1, WS3, WS4, MS2, MS3, MS4 & ES2) encroach slightly into the current safeguarded land related to Gatwick Airport, but this was not raised as an issue, by Gatwick Airport Limited, given the acceptance that future design development work is required for both the CWLR and the Gatwick southern runway Masterplan.</p> </div> <p><i>Source: Crawley Western Link Road – Northern Section Study, SYSTRA, March 2023</i></p> <p>3.10 The route options, including ES3 and ES3a, were considered under a multi-criteria analysis (MCA) to further assess the pros and cons of each option.</p> <p>3.11 The results of the MCA show that ES3a performs the best overall, with ES3 being the second-best.</p> <p>3.12 While GAL maintained its objection to both of these options due to the encroachment on the safeguarded land, SYSTRA states:</p> <div data-bbox="712 1086 1480 1206" style="border: 1px solid black; padding: 5px;"> <p>7.9.3 The MCA demonstrated that option ES3 and particularly ES3a could have substantial positive aspects in comparison to the other Eastern route options. It is acknowledged that these options are unlikely to be able to coexist with a Gatwick southern runway, but the possible significant interim positives prior to a potential future southern runway expansion may warrant further investigation. In this instance, an alternative option post-southern runway</p> </div> <p>...</p> <div data-bbox="712 1257 1480 1313" style="border: 1px solid black; padding: 5px;"> <p>Implementation must also be agreed upon as part of a business case analysis in order to make ES3 and ES3a a feasible option.</p> </div> <p><i>Source: Crawley Western Link Road – Northern Section Study, SYSTRA, March 2023</i></p>

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			<p><u>Refined Area of Search – Conclusions</u></p> <p>3.13 SYSTRA concludes by defining a refined area of search for the northern/eastern section of the CWMMTL. Given the uncertainty over the feasibility of the best-scoring options ES3a and ES3, a separate area of search boundary has been defined to include these.</p> <p><u>CWMMTL Route through Jersey Farm</u></p> <p>3.14 The new access road and the Jersey Farm masterplan have been designed so as to facilitate the future provision of the CWMMTL, such that the new site access road could ultimately form part of the CWMMTL.</p> <p>3.15 This would require upgrading the Jersey Farm LILO junction with the A23 London Road, which would be subject to further assessment and design work, and to the availability of additional land which may be required.</p> <p>3.16 Land within the Jersey Farm site will be safeguarded to allow the CWMMTL to be connected to the access road from the west, and to allow the access road to be widened to accommodate bus lanes and pedestrian/cycleways to be consistent with the anticipated design of the CWMMTL. This is shown in Figure 3.1, and on the illustrative site masterplan provided at Appendix 1.</p> <p>Figure 3.1 – Potential Future Upgrade to Accommodate CWMMTL</p>  <p>4.0 Traffic Analysis and Junction Capacity Assessment</p> <p>Jersey Farm Vehicle Access</p> <p>4.1 The initial stage of the analysis was to consider the potential for some of the proposed Jersey Farm development to be accessed via County Oak Way.</p>

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			<p>4.2 A computer model (LinSig) of the A23 / County Oak Way signal-controlled junction has been purchased from WSCC. The model represents the forthcoming form of the junction once a WSCC-planned capacity-improvement scheme has been completed.</p> <p>4.3 The LinSig model has been used to assess the expected future ability of County Oak Way to accommodate additional traffic to/from the Jersey Farm development.</p> <p>4.4 To do this, the model was run using traffic flow data extracted from each of the future assessment scenarios of the CBC strategic traffic model. The extracted traffic flow data was supplied to Connect Consultants by Stantec on behalf of CBC.</p> <p>4.5 The junction capacity analysis shows that future capacity at the A23 / County Oak Way junction is not sufficient to accommodate a viable amount of the proposed Jersey Farm development.</p> <p>4.6 As such, the proposal is that all vehicular access will be via a new LILO junction connecting the site access road to the east side of the A23 London Road.</p> <p><u>Local Road Network</u></p> <p>4.7 As the proposed LILO access junction requires Jersey Farm traffic to U-turn at Lowfield Heath Roundabout and Fleming Way Roundabout, both roundabouts have been considered in terms of their future ability to accommodate the proposed development traffic in the weekday AM and PM peak hours.</p> <p>4.8 The following sections set out the analysis of the future capacity and operation of Lowfield Heath Roundabout and Fleming Way Roundabout in the CBC Local Plan scenarios.</p> <p><u>CBC Local Plan Strategic Traffic Modelling Scenarios</u></p> <p>4.9 The CBC Local Plan strategic traffic modelling assesses the traffic impact of three different Local Plan scenarios (Scenarios 1-3).</p> <p>4.10 In terms of employment sites, Scenario 1 includes only sites in the Employment Land Trajectory.</p> <p>4.11 Scenario 2 is the same as Scenario 1 with the addition of a strategic employment site at Gatwick Green.</p> <p>4.12 Scenario 3 is the same as Scenario 2 with the addition of the potential new settlements known as West of lfield and West of Kilnwood Vale within Horsham District.</p> <p>4.13 An additional scenario is included to test the effect of providing the CWMMTL to mitigate the impact of the potential new settlements in Scenario 3. This is known as 'Scenario 3 with CWLR'.</p>

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			<p>4.14 Each of the scenarios is assessed in the strategic modelling both with and without the effect of a proposed package of sustainable travel measures aimed at reducing the number of car-borne journeys made in the borough.</p> <p><u>CBC Local Plan Traffic Flows and Junction Capacity</u></p> <p>4.15 The forecast traffic flow data at both Lowfield Heath Roundabout and Fleming Way Roundabout in each of the CBC Local Plan assessment scenarios has been purchased from Stantec/CBC in June 2023.</p> <p>4.16 The CBC Local Plan strategic traffic modelling provides a high-level indication of the operation of junctions in the forecast traffic scenarios, in terms of the ratio of predicted volume of traffic against the theoretical capacity of a junction. This is known as 'volume over capacity' or V/C, expressed as a percentage of a junction's theoretical capacity.</p> <p>4.17 The data purchased from CBC includes the predicted V/C for each of the turning movements on the approaches to both roundabouts.</p> <p>4.18 It shows that Lowfield Heath Roundabout is predicted to be over-capacity in the weekday AM peak hour in scenarios LP1, LP2, and LP3 (ranging from 103% to 106%), and also in the scenario 'LP3 with CWLR' (101%). In the weekday PM peak it is predicted to be over-capacity only in scenario LP3 (at 102%).</p> <p>4.19 Fleming Way Roundabout is predicted to be within capacity in all scenarios in the weekday AM and PM peak-hours, except for the AM peak in scenarios LP3 and 'LP3 with CWLR' without sustainable mitigation (100% and 104% respectively), and scenario 'LP3 with CWLR' with sustainable mitigation (104%).</p> <p>4.20 Given that both roundabouts are indicated by the CBC strategic traffic modelling to be over-capacity in various of local plan future scenarios, more detailed junction capacity analysis has been undertaken to more accurately assess the ability to accommodate the proposed Jersey Farm development traffic.</p> <p><u>Jersey Farm Development Traffic Generation</u></p> <p>4.21 Pre-application advice received from WSCC Highways suggests the use of "the vehicular trip rates used at Table 3.1 of the published Crawley Local Plan transport study, unless there is compelling evidence to support any significant difference for this site".</p> <p>4.22 The CBC Transport Study Table 3.1 identifies weekday AM and PM peak-hour trip rates for a range of land-uses, including warehousing and industrial estate uses which are proposed at Jersey Farm. Those trip rates, and the resultant weekday AM and PM peakhour trip numbers for the proposed maximum 48,150sq.m of warehousing and 4,070sq.m. of industrial estate uses are set out in Table 3.1.</p>

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Table 3.1 – Jersey Farm Trip Rates & Trip Numbers (CBC Transport Study)

Warehousing Vehicles	Trip Rates per 100sqm			Trip Numbers per 48,150 sqm		
	Arrivals	Departures	Total	Arrivals	Departures	Total
AM peak	0.121	0.049	0.17	58	24	82
PM peak	0.017	0.076	0.093	8	37	45
Industrial Estate						
Vehicles	Trip Rates per 100sqm			Trip Numbers per 4070 sqm		
	Arrivals	Departures	Total	Arrivals	Departures	Total
AM peak	0.436	0.153	0.589	18	6	24
PM peak	0.119	0.407	0.526	5	17	21
Total site						
	Arrivals	Departures	Total	Arrivals	Departures	Total
AM peak	0.557	0.202	0.759	76	30	106
PM peak	0.136	0.483	0.619	13	53	66

4.23 The vehicle trip rates shown in Table 3.1 represent all vehicles. For the purposes of junction capacity assessment associated with the proposed industrial / commercial uses, it is important to understand how much of the development traffic is heavy goods vehicle (HGV) traffic.

4.24 The CBC Transport Study does not identify the number or proportion of HGVs, so this information has instead been derived from the industry-standard TRICS database.

4.25 A sample of traffic survey data from development sites with similar characteristics to Jersey Farm has been selected from TRICS using the selection criteria set out in Table 3.2.

Table 3.2 – TRICS Database Selection Criteria

TRICS 7.10.1 key selection criteria		
Land use and trip rate selection		
Select Land Use By:	Full list Of Active Main/Sub Land Uses	
Main Land Use:	02 - EMPLOYMENT	
Sub Land Use:	F - WAREHOUSING (COMMERCIAL)	D - INDUSTRIAL ESTATE
Calculation Options:	Vehicle Trip Rates	
Regions:	All England excluding Greater London	
Primary filtering		
Trip Rate Parameters:	Gross Floor Area	
Range:	10,000 – 80,100 sq.m.	708 - 10,000 sq.m.
Selected Dates:	01/01/15 to 22/11/21	01/01/15 to 18/11/22
Week days to include:	Weekdays	
Location Types to include:	Edge of Town	
Secondary filtering		
Population < 1 Mile:	Default range (<20,000)	1,000 - 50,000
Population < 5 Miles:	Default range (125,001 - 500,000)	

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4.26 Based on the average of the resultant sample sites, the proportion of HGVs (referred to as Other Goods Vehicles [OGVs] in TRICS) for the two proposed land uses in the AM and PM peak hours are set out in Table 3.3.

4.27 The full TRICS output reports can be supplied if required.

Table 3.3 – Proportion and Number of HGVs (from TRICS and CBC data)

Warehousing OGVs	OGV as % of total vehicles (from TRICS)			Number of OGVs (TRICS % applied to CBC total)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
AM peak	37%	56%	46%	21	13	38
PM peak	72%	21%	42%	6	8	19

Industrial Estate OGVs	OGV as % of total vehicles (from TRICS)			Number of OGVs (TRICS % applied to CBC total)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
AM peak	4%	4%	4%	1	0	1
PM peak	3%	1%	1%	0	0	0

4.28 The numbers of total vehicles associated with Jersey Farm in the AM and PM peak hours (from Table 3.1) and the constituent numbers of HGVs (from Table 3.3) are set out in Table 3.4.

Table 3.4 – Jersey Farm Development AM and PM Peak Hour Traffic

Whole site	Total Vehicles (from Table 3.1)			Constituent OGVs (from Table 3.3)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
AM peak	76	30	106	22	13	39
PM peak	13	53	66	6	8	19

Jersey Farm Traffic Distribution

4.29 Given the location of the Jersey farm site and the layout of the local road network, the simplifying assumption is made that the Jersey Farm development traffic will be split equally to/from the north and south at the proposed site access junction on the A23 London Road.

4.30 With a LILO access junction, all Jersey Farm traffic would have to U-turn on arrival or departure, which would involve the Lowfield Heath Roundabout north of the junction and Fleming Way Roundabout south of the junction.

4.31 The distribution of the development traffic beyond both Lowfield Heath Roundabout and Fleming Way Roundabout (i.e., traffic not U-turning on arrival/departure) is assumed to be proportionate to the background traffic, identified by the CBC strategic traffic modelling.

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			<p>4.32 The distribution of the proposed Jersey Farm traffic in the weekday AM and PM peak hours is shown on diagrams provided at Appendix 4.</p> <p><u>Junction Capacity Assessments – Without Jersey Farm Traffic</u></p> <p>4.33 The ARCADY computer program is an industry standard computer package for modelling the operation of roundabouts. ARCADY uses the geometry of the junction combined with traffic flow information to predict capacity. The software provides a number of results in its output; often the most meaningful metric is the Ratio of Flow to Capacity (RFC), where an RFC of 1.00 on any approach to the junction reflects a traffic flow equal to the theoretical capacity of that approach.</p> <p>4.34 ARCADY is typically operated using ‘One Hour’ mode which estimates the traffic flow profile for an hour-long period based on a bell-shaped curve with a 15-minute ‘Warm Up’ period before, and a 15-minute ‘Cool Down’ period either side of the 60-minute peak-hour. This simulates the robust scenario of a peak within the peak hour.</p> <p>4.35 ARCADY models have been created of both Lowfield Heath Roundabout and Fleming Way Roundabout. These models use the same geometric parameters as those which have been accepted by the Local Highway Authority, WSCC, through the Transport Assessment of a recent planning application at Hydehurst Lane (CBC planning reference CR/2021/0167/FUL).</p> <p>4.36 The computer models of the roundabouts are therefore consistent with those which have already been considered to be acceptable for simulating the capacity and delay of the two roundabouts.</p> <p><u>Lowfield Heath Roundabout Without Jersey Farm Traffic</u></p> <p>4.37 The ARCADY model of Lowfield Heath Roundabout is shown to be approaching capacity or overcapacity in the weekday AM peak in all of the Local Plan Scenarios, with and without sustainable mitigation measures. The RFC on the A23 (north) approach is shown to range from 0.92 to 1.04, while on the Old Brighton Road approach it ranges from 0.91 to 0.97.</p> <p>4.38 In the weekday PM peak, the roundabout is shown to be approaching capacity in scenarios LP1 and LP2, and overcapacity in LP3 with and without sustainable mitigation and the CWMMTL.</p> <p>4.39 The summary results from the ARCADY software are provided at Appendix 5.</p> <p><u>Fleming Way Roundabout Without Jersey Farm Traffic</u></p> <p>4.40 The ARCADY modelling shows the A23 (north) approach to the Fleming Way Roundabout to be approaching capacity or overcapacity in the weekday AM peak in all of the Local Plan scenarios, with and without sustainable mitigation measures; its RFC ranges from 0.96 to 1.13. All other approaches are within capacity in the weekday AM peak in all scenarios.</p>

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			<p>4.41 In the weekday PM peak, the roundabout is shown to be within capacity in all scenarios.</p> <p>4.42 The summary results from the ARCADY software are provided at Appendix 5.</p> <p><u>Junction Capacity Assessments – With the Addition of Jersey Farm Traffic</u></p> <p>4.43 The CBC Local Plan scenario ‘LP2’ comprises the proposed Local Plan development plus the Gatwick Green strategic employment site.</p> <p>4.44 The aim of promoting the Jersey Farm development is to provide an alternative to Gatwick Green as the strategic employment site allocation in the CBC Local Plan.</p> <p>4.45 The equivalent scenario to ‘LP2’ is a scenario of ‘LP1 plus Jersey Farm’ (representing the Local Plan development plus Jersey Farm instead of Gatwick Green).</p> <p>4.46 Scenario ‘LP3’ is also considered because it includes the potential major development sites in neighbouring Horsham District Council. LP3 also includes traffic associated with Gatwick Green, so adding the proposed Jersey Farm traffic to this scenario will effectively double-count the traffic associated with strategic employment sites. However, it seems unlikely that much Gatwick Green traffic will use Lowfield Heath and Fleming Way roundabouts, so the double-counting effect is not likely to be significant.</p> <p>4.47 WSCC has published guidance on the assessment of junction capacity and the thresholds above which it considers the impact of a proposed development to be a material impact which requires mitigation. Reference to this guidance is included in the following sections.</p> <p><u>Lowfield Heath Roundabout with Jersey Farm Traffic</u></p> <p>4.48 Without Jersey Farm traffic, Lowfield Heath Roundabout is shown to be approaching capacity or overcapacity on the Old Brighton Road and the A23 (north) approaches in all scenarios in the weekday AM peak, and overcapacity on Old Brighton Road in the weekday PM peak in scenario ‘LP3’.</p> <p>4.49 With the addition of Jersey Farm traffic, the RFC values on the Old Brighton Road and A23 (north) approaches increase by only a small absolute number in each of the scenarios (increase ranging from 0.02-0.04), but because the approaches are already overcapacity, the small increase in RFC translates to a disproportionately large increase in queue lengths and delay.</p> <p>4.50 A23 (north) approach: In all of the CBC Local Plan scenarios the increase in delay associated with Jersey Farm traffic in the AM peak is categorised by WSCC as a material impact and needs mitigating to nil-detriment.</p> <p>4.51 Old Brighton Road approach: In all of the CBC Local Plan scenarios the increase in delay associated with Jersey Farm traffic in the AM peak, and in the ‘LP3’ scenarios in the PM peak, is categorised by WSCC as a material impact and needs mitigating to nil-detriment.</p>

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			<p>4.52 A23 (south) approach: In all of the CBC Local Plan scenarios the delay is less than 90 seconds except in 'LP3 with CWLR with Sustainable Mitigation' in which it exceeds 90 seconds. The impact of Jersey Farm on this approach is not material in any of the scenarios, so no mitigation is needed on this approach except in 'LP3 with CWLR with Sustainable Mitigation'.</p> <p>4.53 The summary results from the ARCADY software are provided at Appendix 5; the orange-coloured cells in the summary tables indicate where the resultant delay exceeds the WSCC threshold for material impact which will require mitigation.</p> <p><u>Fleming Way Roundabout with Jersey Farm Traffic:</u></p> <p>4.54 Without Jersey Farm traffic, at Fleming Way Roundabout only the A23 (north) approach in the weekday AM peak is shown to be approaching capacity or overcapacity.</p> <p>4.55 With the addition of Jersey Farm traffic, the RFC value on this approach increases by only a small absolute number in each of the scenarios (0.04-0.05 increase), but because the approach is already over capacity, the small increase in RFC translates to a disproportionately large increase in queue length and delay.</p> <p>4.56 The A23 (north) approach is the only approach which is shown to have capacity issues.</p> <p>4.57 In all scenarios it is categorised by WSCC as a material impact and needs mitigating to nil-detriment.</p> <p>4.58 The summary results from the ARCADY software are provided at Appendix 5; the orange-coloured cells in the summary tables indicate where the resultant delay exceeds the WSCC threshold for material impact which will require mitigation.</p> <p>5.0 Proposed Mitigation</p> <p><u>Mobility Strategy and Site-Wide Travel Plan</u></p> <p>5.1 A key element of the Jersey Farm proposal is that it will incorporate a comprehensive Mobility Strategy which will ensure that sustainable travel is at the centre of the development's ethos.</p> <p>5.2 The development will maximise its inherent accessibility by non-car modes through a site wide Travel Plan to promote sustainable travel, including collaboration with Manor Royal BID, and will ensure the individual occupiers and operators promote non-car travel to their workforces.</p> <p><u>Physical Mitigation Schemes</u></p> <p>5.3 The junction capacity modelling, as described in the previous section, has identified that capacity improvement schemes will be required in the future CBC Local Plan scenarios to accommodate the proposed Jersey Farm traffic at both Fleming Way Roundabout and Lowfield Heath Roundabout.</p>

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			<p>5.4 Based on the results of the ARCADY modelling described in the previous section, capacity improvement schemes have been identified at both Fleming Way Roundabout and Lowfield Heath Roundabout to mitigate the traffic impact of Jersey Farm.</p> <p><u>Fleming Way Roundabout</u></p> <p>5.5 The identified capacity improvement scheme provides the necessary capacity improvement on the A23 approach from the north (southbound). This comprises an additional lane on the southbound approach, which is achieved by using some land from the grass verge, some from the splitter island, and some from the roundabout island. All of the land required to deliver this scheme is within the public highway.</p> <p>5.6 A drawing of the capacity improvement scheme, drawing number 21071-011, is provided at Appendix 6. The scheme takes into account the recommendations of a Stage 1 RSA which is provided, along with the Designer's Response, at Appendix 3.</p> <p>5.7 The capacity improvement scheme has been tested in ARCADY; the summary results of the improvement scheme in the various assessment scenarios are shown in Appendix 5, which show that the scheme results in the roundabout operating within capacity in all scenarios.</p> <p>5.8 An initial estimate of the cost to construct the scheme is c.£290,000.</p> <p><u>Lowfield Heath Roundabout</u></p> <p>5.9 The capacity improvement scheme at Lowfield Heath Roundabout creates a short length of one additional lane on the Old Brighton Road approach, and an additional lane on the A23 westbound approach. This is achieved using land entirely within public highway.</p> <p>5.10 A drawing of the capacity improvement scheme, drawing number 21071-012, is provided at Appendix 6. The scheme takes into account the recommendations of a Stage 1 RSA which is provided, along with the Designer's Response, at Appendix 3.</p> <p>5.11 The capacity improvement scheme has been tested in ARCADY; the summary results of the improvement scheme in the various assessment scenarios are shown in Appendix 5, which show that the scheme results in the roundabout operating within capacity in all scenarios.</p> <p>5.12 An initial estimate of the cost to construct the scheme is c.£690,000.</p> <p>6.0 Comparison with Gatwick Green Employment Site</p> <p>6.1 The CBC strategic traffic modelling assesses the traffic impact of three different Local Plan scenarios (1-3).</p> <p>6.2 In terms of employment, Scenario 1 includes only sites in the Employment Land Trajectory.</p>

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			<p>6.3 Scenario 2 is the same as Scenario 1, with the addition of a strategic employment site at Gatwick Green. The Gatwick Green assumptions comprise 77,500sqm gross floor area, split into:</p> <ul style="list-style-type: none"> • B8 Parcels Distribution (10%) or 7,750 sqm • B8 Commercial Warehousing (60%) or 46,500 sqm • B2 Industrial estate (30%) or 23,250 sqm <p><u>Gatwick Green Site</u></p> <p>6.4 In Scenario 2 (with Gatwick Green employment site), the Gatwick Green site is estimated to generate 333 two-way trips in the AM peak and 298 two-way trips in the PM peak.</p> <p>6.5 There are impacts predicted on the B2036 Balcombe Road for most of its length both north and south of the B2037 Antlands Lane junction with Balcombe Road. These impacts are greater in the PM peak than in the AM peak.</p> <p>6.6 A significant proportion of these trips are freight/HGV traffic that cannot be replaced by active modes or public transport. The modelling has assumed that there will be an element of car trips for employees working at the site and these would respond to sustainable mitigation measures.</p> <p>6.7 Overall, the residual Gatwick Green trips assumed to impact the network are 312 two-way trips in the AM peak and 281 trips in the PM peak.</p> <p>6.8 During the AM peak, 67 two-way trips are predicted to use the northern sections of Balcombe Road through Horley and beyond, while 245 two-way trips are predicted to use the southern sections of Balcombe Road and beyond.</p> <p>6.9 Around 68 two-way trips are predicted to use the rural routes east of the site, including Shipley Bridge Lane through Copthorne en-route to the motorway junction and Effingham Road to/from East Grinstead.</p> <p>6.10 The M23 junction 10 is predicted to be used by 55 of the Gatwick Green trips in the AM peak; none are predicted to use junction 9.</p> <p>6.11 During the PM peak, 65 two-way trips are predicted to use the northern sections of Balcombe Road through Horley and beyond, while 216 two-way trips are predicted to use the southern sections of Balcombe Road and beyond.</p> <p>6.12 Around 40 two-way trips are predicted to use the rural routes east of the site, including Shipley Bridge Lane through Copthorne en-route to the motorway junction and Effingham Road to/from East Grinstead; around the same number are predicted to use the southern part of Balcombe Road.</p>

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			<p>6.13 The M23 junction 10 is predicted to be used by around 40 of the Gatwick Green trips in the PM peak; none are predicted to use junction 9.</p> <p>6.14 These predicted traffic flows to/from Gatwick Green are shown graphically on maps at Appendix 7. These clearly show the impact of the traffic on the surrounding local roads.</p> <p>6.15 To mitigate the impacts of the Gatwick Green traffic on the surrounding local roads and lanes, an HGV ban is proposed for traffic heading to Gatwick Green from the north on Balcombe Road to prevent this traffic travelling through the built-up area in Horley.</p> <p>6.16 A right turn ban is also proposed for HGV traffic egressing the site, to prevent this traffic using the northern sections of Balcombe Road thus mitigating any potential adverse impacts from this HGV traffic such as noise and air pollution.</p> <p>6.17 A committed/planned new link road between the A2011 and Balcombe Road, designed to improve the access route to the North East Sector developments, is shown to have capacity problems in the Reference Case and the Local Plan scenarios, even after the proposed sustainable travel mitigation is applied.</p> <p>6.18 Clearly, there are concerns and issues regarding the Gatwick Green freight traffic using the local roads and lanes, and with Gatwick Green traffic generally on the surrounding road network.</p> <p><u>Jersey Farm Site</u></p> <p>6.19 Jersey Farm is located in an existing employment district, with purpose-built roads which connect to the principal and strategic road network.</p> <p>6.20 The site has ready-made non-car access options, providing excellent opportunities for the future occupiers to travel sustainably, and it offers safeguarded land for the future provision of the CWMMTL and its adjoining bus, foot, and cycle routes.</p> <p>6.21 The off-site traffic impact of Jersey Farm at the two closest roundabout junctions can be mitigated by relatively straightforward capacity improvement schemes which are effective, safe, deliverable, and viable.</p> <p>6.22 In comparison to the predicted Gatwick Green traffic flows, described above and shown at Appendix 7, the location of the Jersey Farm site means that its peak-hour traffic is likely to use the purpose-built, strategic routes.</p> <p>6.23 Traffic to/from the north will either travel via the A23 / A217 for Horley, Redhill, and Reigate, or via Airport Way and the M23 for longer journeys; it will not likely use Balcombe Road through Horley in the way that Gatwick Green traffic is predicted to do.</p> <p>6.24 Traffic to/from the east will use the A23 and A2011 dual carriageways and the A264 east of the M23; there is no reason for it to use rural lanes and road around Copthorne, as predicted for the Gatwick Green traffic.</p>

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			<p>6.25 Traffic to/from the south will use the A23 dual carriageway Crawley Avenue and the M23 via junction 11; traffic to/from the west will use the A2220 dual carriageway Horsham Road and the dual carriageway A264.</p> <p>6.26 These route options for Jersey Farm traffic are shown graphically on a map at Appendix 7.</p> <p>6.27 Jersey Farm's location means that its traffic to/from the motorway network has the choice of three motorway junctions, depending on direction of travel; it would not all be loaded on to M23 junction 10 as Gatwick Green's traffic is predicted to be.</p> <p>7.0 Conclusion</p> <p>7.1 The Jersey Farm proposal for the CBC Local Plan is for an employment site comprising a mix of office, light industry, and warehousing/distribution land-uses in buildings of various sizes, as an extension to the existing Manor Royal employment zone.</p> <p>7.2 For the purposes of this traffic assessment, the proposed Jersey Farm development is assumed to not exceed the following quanta: -</p> <ul style="list-style-type: none"> • 48,150sqm Warehousing. • 4,070sqm Industrial uses. <p>7.3 This Technical Note demonstrates that the Jersey Farm site is in a highly sustainable location within an existing employment district, with excellent opportunities for employees and visitors to travel on foot, cycle, and bus, and with purpose-built roads which connect to the principal and strategic road network.</p> <p>7.4 The Jersey Farm site offers safeguarded land for the future provision of the CWMMTL and its adjoining bus, foot, and cycle routes.</p> <p>7.5 It is demonstrated that Jersey Farm can be accessed via a new simple left-in-left-out junction on the A23 London Road.</p> <p>7.6 Following consultation with the local highway authority, WSCC, and using forecast traffic flow data from CBC's own strategic traffic modelling, this Technical Note demonstrates that the off-site traffic impact at the two closest roundabout junctions can be mitigated by relatively straightforward capacity-improvement schemes which are effective, safe, deliverable, and viable.</p> <p>7.7 It is noted that there are clearly concerns and issues regarding the Gatwick Green freight traffic using the local roads and lanes, and with Gatwick Green traffic generally on the surrounding road network.</p> <p>7.8 It is therefore concluded that in traffic and transport terms, Jersey Farm offers a realistic, viable, and deliverable employment site which should be considered as CBC's Local Plan strategic employment site in preference to the Gatwick Green site.</p>

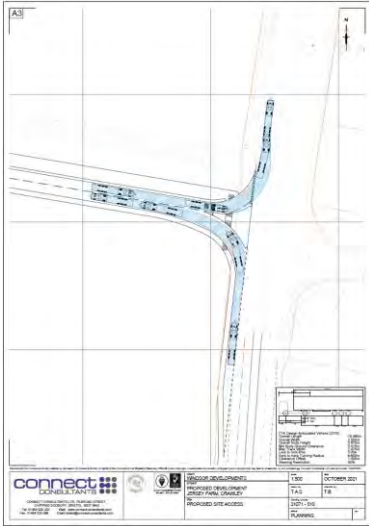
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Appendix 1: Initial Indicative Masterplan



Appendix 2: Proposed Jersey Farm Access Junction




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Appendix 3: RSA Report and designer's response

Report Number: Connect/1260
Date: 4th October 2021
Prepared by: Julian Bartlett



JBartlett Consulting Ltd
UK Company Number 8270647

Jersey Farm Development, Crawley
Highway Infrastructure
Road Safety Audit Stage 1



**JERSEY FARM DEVELOPMENT
CRAWLEY: HIGHWAY
IMPROVEMENTS**

Road Safety Audit
Stage 1

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Job Number: 1260
Client: Connect Consultants
Highway Authority: Surrey County Council
Project: Jersey Farm Development, Highway Improvements
Report Title: Stage 1 Road Safety Audit
Date: 4th October 2021

Issue	Purpose / Status	Prepared By	Checked	Approved	Date
D1	DRAFT	Julian Bartlett	Lyn Jones	Julian Bartlett	October 2021
D2	Minor Typos	Julian Bartlett	Lyn Jones	Julian Bartlett	October 2021



Prepared For:
Connect Consultants
78 Broad Street
Chipping Sodbury
Bristol BS37 6AG

J Bartlett Consulting Ltd has prepared this report in accordance with the instructions of the above named Client for their sole and specific use. Any other persons who may use the information contained herein do so at their own risk.

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Ref. No.	Respondent	Policy/ Para	Comments																
			<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>Jersey Farm Development, Crawley Highway Infrastructure Road Safety Audit Stage 1</p>  <p>CONTENTS</p> <p>1 Introduction.....2 2 Issues Raised By The Stage 1 Road Safety Audit.....5 3 Issues Outside The Scope Of This Road Safety Audit..... 10 4 Audit Team Statement..... 11 5 Audit Location Plan12</p> </div> <div style="width: 45%;"> <p>Jersey Farm Development, Crawley Highway Infrastructure Road Safety Audit Stage 1</p>  <p>1 INTRODUCTION</p> <p>1.1 This report results from a Stage 1 Road Safety Audit undertaken by J Bartlett Consulting Limited following a request from Tim Britton of Connect Consultants. The Audit was carried out during October 2021. It should be noted that the effects of the coronavirus pandemic on traffic movements may still be evident however best advice is that traffic movements are returning to pre-covid levels.</p> <p>1.2 This Safety Audit considers the introduction of a series of improvements to the Lowfield Heath Roundabout, Fleming Way Roundabout and left in left out junction to serve the development.</p> <p>1.3 The audit team comprised the following individuals:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 60%;">Julian Bartlett BEng FCIHT FSoRSA</td> <td style="width: 40%; text-align: right;">Road Safety Audit Team Leader</td> </tr> <tr> <td>Lyn Jones HNC MCIHT MSoRSA</td> <td style="text-align: right;">Road Safety Audit Team Member</td> </tr> </table> <p>Both Julian Bartlett and Lyn Jones hold a Highways England Certificate of Competency in Road Safety Audit gained through the education route.</p> <p>1.4 The following documents and drawings were made available to the Audit Team for this safety audit.</p> <p>Drawings</p> <table style="width: 100%; border: none;"> <thead> <tr> <th style="text-align: left;">Drawing Number</th> <th style="text-align: left;">Rev</th> <th style="text-align: left;">Title</th> </tr> </thead> <tbody> <tr> <td>21071 SK210923.2</td> <td>-</td> <td>Proposed Site Access</td> </tr> <tr> <td>21071 SK210831.1</td> <td>-</td> <td>Fleming Way Roundabout Proposed Improvements</td> </tr> <tr> <td>21071 SK210923.1</td> <td>-</td> <td>Lowfield Heath Roundabout Proposed Improvements</td> </tr> </tbody> </table> <p>Documents</p> <p>Jersey Farm Strategic Employment Site, Crawley: CBC LP3 + Jersey Farm Left-In-Left-Out 0390-RDJWL-ZZ-XX-DR-A-0050: Proposed Masterplan</p> <p>Departures, None Notified.</p> <p style="text-align: center; font-size: small;">Specialists in Road Safety, Traffic and Transportation Engineering; Quality, Environment Health & Safety Management Systems</p> <p style="text-align: center;">2</p> </div> </div>	Julian Bartlett BEng FCIHT FSoRSA	Road Safety Audit Team Leader	Lyn Jones HNC MCIHT MSoRSA	Road Safety Audit Team Member	Drawing Number	Rev	Title	21071 SK210923.2	-	Proposed Site Access	21071 SK210831.1	-	Fleming Way Roundabout Proposed Improvements	21071 SK210923.1	-	Lowfield Heath Roundabout Proposed Improvements
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			<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p data-bbox="734 296 943 347">Jersey Farm Development, Crawley Highway Infrastructure Road Safety Audit Stage 1</p>  <p data-bbox="752 357 1290 523">1.5 A site visit was undertaken by the Audit Team on 4th October 2021 between 10:30 and 11:45. It was fine but overcast and the road surface was drying during the site visit. Traffic movements were as expected at the time of the site visit with free movements in both directions on the A23. One motorcycle was seen, no pedal cyclist and two pedestrians using footway opposite the development site. While unable to verify the observation it appeared that vehicles speeds were relatively high with hard acceleration into the derestricted limit. It has been assumed that these movements may not be typical for the area and that more realistic movements have been accounted for under the traffic modelling undertaken for the scheme. See also paragraphs 1.1</p> <p data-bbox="752 539 1290 654">1.6 The scheme has been examined and this report compiled only regarding the safety implications for road users of the scheme as presented. It has not been examined or verified for compliance with any other Standards or criteria. However, to clearly explain a safety problem or the recommendation to resolve a problem, the Audit Team may on occasion have referred to a design standard for information only. Any audit comments should not be construed as implying that a technical audit has been undertaken in any respect.</p> <p data-bbox="752 670 1290 737">1.7 The terms of reference for the audit are as described in the Highways England Design Manual for Roads and Bridges (DMRB), Volume 5, Section 2, GG119 (2020) 'Road Safety Audit'. The audit has also been undertaken in light of the philosophy outlined in the CIHT 'Road Safety Guidelines' 2020 Edition.</p> <p data-bbox="752 753 1290 782">1.8 The Audit Team have referred to appropriate design documentation as required while undertaking this audit. Reference texts include but are not limited to</p> <ul data-bbox="788 798 1182 919" style="list-style-type: none"> • Design Manual For Roads And Bridges (DMRB); • Manual For Streets; • Manual For Streets 2; • Highway Construction Details; • Specification For Highway Works; • Traffic Signs Manual Chapter 6; • Traffic Signs Regulations and General Directions (TSRDG) <p data-bbox="752 925 1290 1056">1.9 Any recommendations included within this report should not be regarded as being prescriptive design solutions to the problems raised. They are intended only to indicate a proportionate and viable means of eliminating or mitigating the identified problem, in accordance with GG 119 (2020), and in no way, imply that a formal design process has been undertaken. There may be alternative methods of addressing a problem which would be equally acceptable in achieving the desired elimination or mitigation and these should be considered when responding to this report.</p> <p data-bbox="824 1117 1205 1152" style="text-align: center;">Specialists in Road Safety, Traffic and Transportation Engineering; Quality, Environment Health & Safety Management Systems 3</p> </div> <div style="width: 45%;"> <p data-bbox="1317 296 1525 347">Jersey Farm Development, Crawley Highway Infrastructure Road Safety Audit Stage 1</p>  <p data-bbox="1335 357 1883 446">1.10 If issues were identified that are strictly outside the scope of this Road Safety Audit, or could not be classified as likely to increase the risk of crashes occurring, these have been included as Section 3 for completeness. It is also recommended that these are brought to the attention of the highway authority for their consideration if deemed appropriate</p> <p data-bbox="1335 462 1883 494">1.11 As far as the audit team are aware no previous stages of road safety audit have been undertaken on the proposals presented as part of this road safety audit</p> <p data-bbox="1406 1136 1794 1171" style="text-align: center;">Specialists in Road Safety, Traffic and Transportation Engineering; Quality, Environment Health & Safety Management Systems 4</p> </div> </div>

2 ISSUES RAISED BY THE STAGE 1 ROAD SAFETY AUDIT

2.1 Problems in this Audit will be identified linearly and by drawing number

Drg: 21071 SK210923.2 Rev -

2.2 After due and careful consideration, the audit team have been unable to identify any areas of concern regarding highway road safety associated with the information provided on this drawing.

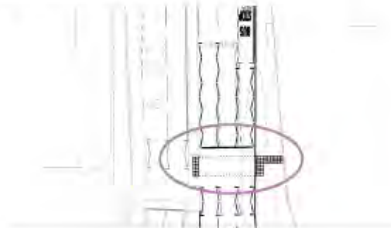
Drg: 21071 SK210831.1 Rev -

2.3 Problem 1

Location: Fleming Way Roundabout: Southbound approach to controlled pedestrian crossing

Summary: High sided vehicles (including buses) blocking forward visibility of nearside and offside signal heads

There is the potential for the drivers of vehicles approaching the crossing to be unaware of the signal operation should a high sided vehicle be located to either side in lanes 1 and 3. This in turn could resulting in failure to conform and an increased risk of collision with users of the crossing



Recommendation

It is recommended that as part of the detailed design secondary signal poles are located such that signal heads can be viewed from all lanes, the use of double height signal heads may also be beneficial

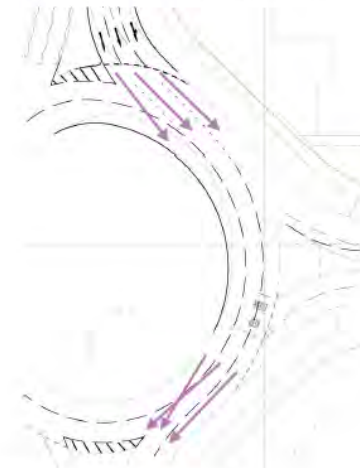
2.4 Problem 2

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Location: Fleming Way Roundabout: Southbound approach to roundabout give way

Summary: The approach is marked for three lanes to travel straight ahead with lane 1 also being marked for left turn whereas the straight ahead exit lane only allows for two lane exit

There is the potential for drivers seeking to travel north to south through the roundabout to choose any of the three approach lanes to undertake the desired manoeuvre as indicated by the lane markings. Realistically lane 3 continues round the circulatory carriageway rather than allowing the movement identified to occur leading to the potential for inappropriate lane changing and an increased risk of side impact collisions on the circulatory carriageway



Recommendation

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It is recommended that the arrows on the approach to the give way from the north are supplemented with route destination marking in the form of route designation numbers and directional signing is provided to provide appropriate driver information in terms of lane choice for destinations. Lane 1 should be marked for left turn only. There appears to be sufficient space within the circulatory carriageway to allow for lane widths to be adjusted and spiral markings introduced which would guide drivers to appropriate exit points.

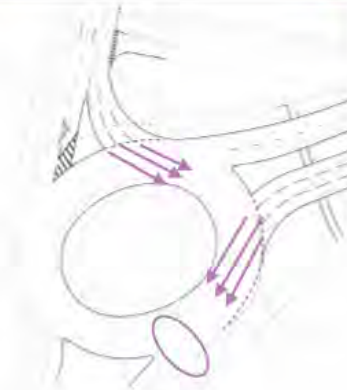
Drg: 21071 SK210923.1 Rev -

2.5 Problem 3

Location: Lowfield Heath Roundabout: Southbound and Westbound approaches to roundabout give way

Summary: The approaches are marked for three lanes entry to the circulatory carriageway whereas the exit lanes only allows for two lane exit

Similarly, to Fleming Way Roundabout the entry arms indicated are marked into three lanes whereas exits are two lane only. This leads to driver confusion as to appropriate lane selection and as such increased the potential for side impact type collisions on the circulatory carriageway as drivers seek to take the desired exit. In this case the circulatory carriageway is not marked which is likely to exacerbate the confusion and increase potential for collisions



Recommendation

It is recommended that arrows and route destination marking in the form of route designation numbers and directional signing are provided for all approaches. Lane 1 for each approach being marked for left turn only. Similarly, to Fleming Way Roundabout there appears to be sufficient space within the circulatory carriageway to allow for lane widths to be adjusted and spiral markings introduced which would guide drivers to appropriate exit points.

2.6 Problem 4




Location: Lowfield Heath Roundabout: Westbound uncontrolled crossing

Summary: Through carriageway widened to three lanes making pedestrian crossing distances unsustainable.

The proposals lead to the widening of the west bound approach to the roundabout to three lanes at the uncontrolled pedestrian crossing point. It is virtually impossible for pedestrians, particularly the elderly, young and disabled to cross three lanes of live traffic in a safe manner. If pedestrians seek to cross between stationary or slow-moving traffic driver visibility of the crossing movement and also pedestrian visibility

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			<p>Jersey Farm Development, Crawley Highway Infrastructure Road Safety Audit Stage 1</p> <p><i>JBartlett</i> Consulting Ltd UK Company Number 5270640</p> <p>of the oncoming vehicles is compromised leading to an increased risk of vehicle pedestrian collisions</p>  <p>Recommendation It is recommended that either the crossing location is removed, and pedestrians directed to the other side of the roundabout where maximum crossing distances are over two lanes or that a signal-controlled pedestrian crossing is provided.</p> <p>Specialists in Road Safety, Traffic and Transportation Engineering; Quality, Environment Health & Safety Management Systems</p> <p>9</p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>Jersey Farm Development, Crawley Highway Infrastructure Road Safety Audit Stage 1</p> <p>3 ISSUES OUTSIDE THE SCOPE OF THIS ROAD SAFETY AUDIT</p> <p>3.1 No further issues were identified</p> </div> <div style="width: 45%; text-align: right;">  <p>Jersey Farm Development, Crawley Highway Infrastructure Road Safety Audit Stage 1</p> <p>4 AUDIT TEAM STATEMENT</p> <p>We certify that this Audit has been carried out adopting the principles contained in the Highways England standard GG 119 'Road Safety Audits' and in line with the philosophy outlined in the CIHT 'Road Safety Guidelines' 2020 Edition.</p> <p>Road Safety Audit Team Leader Name: Julian Bartlett Signed:  Position: Director Organisation: J Bartlett Consulting Ltd Date: 14th October 2021</p> <p>Road Safety Audit Team Member Name: Lyn Jones Signed:  Position: Associate Organisation: J Bartlett Consulting Ltd Date: 14th October 2021</p> <p>Contact Details as per record sheet</p> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 20px;"> <p style="width: 45%; text-align: center;">Specialists in Road Safety, Traffic and Transportation Engineering; Quality, Environment Health & Safety Management Systems 10</p> <p style="width: 45%; text-align: center;">Specialists in Road Safety, Traffic and Transportation Engineering; Quality, Environment Health & Safety Management Systems 11</p> </div>

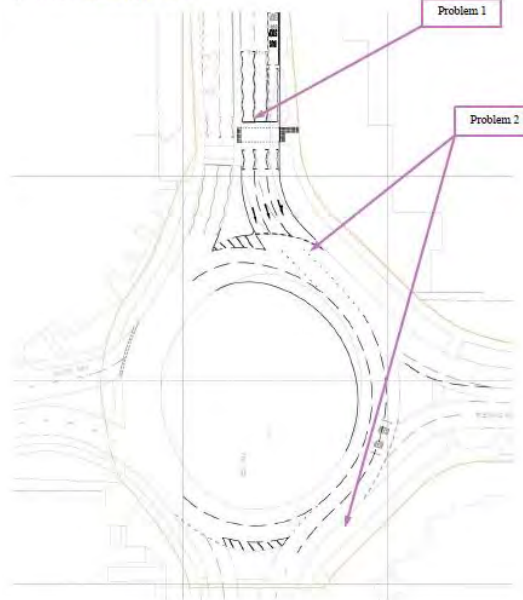
Chapter 9. Economic Growth

Ref. No.	Respondent	Policy/ Para	Comments
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Jersey Farm Development, Crawley
Highway Infrastructure
Road Safety Audit Stage 1

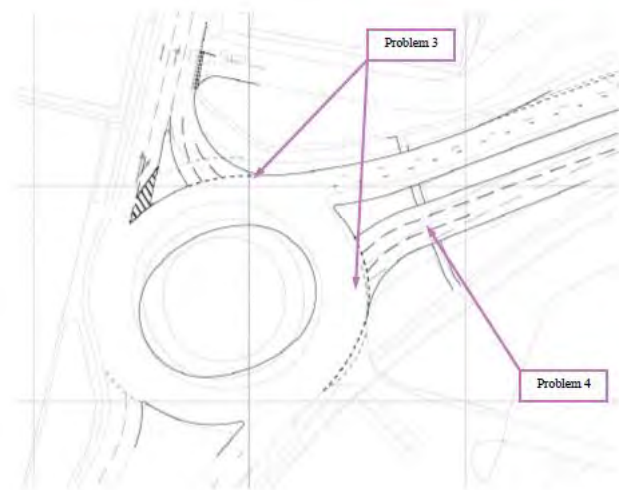


5 AUDIT LOCATION PLAN



Specialists in Road Safety, Traffic and Transportation Engineering;
Quality, Environment Health & Safety Management Systems

Jersey Farm Development, Crawley
Highway Infrastructure
Road Safety Audit Stage 1



Specialists in Road Safety, Traffic and Transportation Engineering;
Quality, Environment Health & Safety Management Systems

Chapter 9. Economic Growth

Ref. No.	Respondent	Policy/ Para	Comments
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Road Safety Audit Response Report

F1 - Project details

Table F.1 Project details

Report title:	Jersey Farm Development, Crawley: Highway Improvements, Road Safety Audit Stage 1
Date:	4 th October 2021
Document reference and revision:	21071-RSAR-Jersey Farm A23 - 20211015
Prepared by:	Tim Britton
On behalf of:	Connect Consultants

Table F.2 Authorisation sheet

Project:	21071 - Jersey Farm, Crawley
Report title:	Jersey Farm Development, Crawley: Highway Improvements - RSA1 Response Report
Prepared by:	
Name:	Tim Britton
Position:	Associate Transport Planner
Signed:	
Organisation:	Connect Consultants Ltd
Date:	15 th October 2021
Approved by:	
Name:	Tim Britton
Position:	Associate Transport Planner
Signed:	
Organisation:	Connect Consultants Ltd
Date:	15 th October 2021



F2 - Introduction

This response report is relating to the proposed development of a mixed-use employment site at Jersey Farm, Crawley. The proposals include a new left-in-left-out junction on the A23 London Road, and highway capacity improvement works on the A23 Fleming Way roundabout and the A23 Lowfield Heath roundabout. This report is in response to the RSA Stage 1, completed by J Bartlett Consulting Ltd dated 4th October 2021. The J Bartlett Consulting report reference number is Connect/1260.

This RSA response report was written by Tim Britton of Connect Consultants Ltd.

F3 - Key personnel

Table F.3 Key personnel

Oversseeing Organisation:	West Sussex County Council
RSA team:	Julian Bartlett BEng MCHT FSIORSA, Audit Team Leader, J Bartlett Consulting Ltd Lyn Jones HNC MCHT MSORSA, Audit Team Member, J Bartlett Consulting Ltd
Design organisation:	Tim Britton, Associate Transport Planner, Connect Consultants Ltd

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Ref. No.	Respondent	Policy/ Para	Comments
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F4 - Road safety audit decision log

The RSA report identifies four problems and offers recommendations to resolve them.

Table F.4 Road safety audit decision log

RSA problem	RSA recommendation	Design organisation response	Overseeing Organisation response	Agreed RSA action
21071 SK210923.2 - Proposed Site Access 2.2 After due and careful consideration, the audit team have been unable to identify any areas of concern regarding highway road safety associated with the information provided on this drawing	None.	The RSA was undertaken based on Connect sketch drawing 21071 SK210923.2. As the RSA found no problems, the scheme drawing has been finalised as drawing 21071 - 010.		Scheme drawing finalised as drawing 21071 - 010.
21071 SK210831.1 - Fleming Way Roundabout 2.3 Problem 1 There is the potential for the drivers of vehicles approaching the crossing to be unaware of the signal operation should a high sided vehicle be located to either side in lanes 1 and 3. This in turn could result in failure to conform and an increased risk of collision with users of the crossing.	It is recommended that as part of the detailed design secondary signal poles are located such that signal heads can be viewed from all lanes, the use of double height signal heads may also be beneficial	Drawing will be updated to show location of new secondary signal heads mounted on double height poles.		Scheme drawing to be updated and finalised as drawing 21071 - 011.



RSA problem	RSA recommendation	Design organisation response	Overseeing Organisation response	Agreed RSA action
21071 SK210831.1 - Fleming Way Roundabout 2.4 Problem 2 Southbound approach to roundabout give way. There is the potential for drivers seeking to travel north to south through the roundabout to choose any of the three approach lanes to undertake the desired manoeuvre as indicated by the lane markings. Realistically lane 3 continues round the circulatory carriageway rather than allowing the movement identified to occur leading to the potential for inappropriate lane changing and an increased risk of side impact collisions on the circulatory carriageway.	It is recommended that the arrows on the approach to the give way from the north are supplemented with route destination marking in the form of route designation numbers and directional signing is provided to provide appropriate driver information in terms of lane choice for destinations. Lane 1 should be marked for left turn only. There appears to be sufficient space within the circulatory carriageway to allow for lane widths to be adjusted and spiral markings introduced which would guide drivers to appropriate exit points.	Lane markings will be supplemented with route destinations as suggested, however, the predominant traffic flow on this approach is straight ahead to the A23 south, so the left lane will be marked for both left and ahead, which means there is no need for spiral lane markings on the circulatory carriageway.		Scheme drawing to be updated and finalised as drawing 21071 - 011.
21071 SK210923.1 - Lowfield Heath Roundabout 2.5 Problem 3 Southbound and Westbound approaches to roundabout give way. Similarly, to Fleming Way Roundabout the entry arms indicated are marked into three lanes whereas exits are two lane only. This leads to	It is recommended that arrows and route destination marking in the form of route designation numbers and directional signing are provided for all approaches. Lane 1 for each approach being marked for left turn only. Similarly, to Fleming Way Roundabout there appears to	Lane markings will be supplemented with arrows and route destination markings as suggested, and spiral lane markings will be shown on the circulatory carriageway.		Schems drawing to be updated and finalised as drawing 21071 - 012.

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Ref. No. Respondent Policy/ Para Comments



RSA problem	RSA recommendation	Design organisation response	Overseeing Organisation response	Agreed RSA action
driver confusion as to appropriate lane selection and as such increased the potential for side impact type collisions on the circulatory carriageway as drivers seek to take the desired exit. In this case the circulatory carriageway is not marked which is likely to exacerbate the confusion and increase potential for collisions.	be sufficient space within the circulatory carriageway to allow for lane widths to be adjusted and spiral markings introduced which would guide drivers to appropriate exit points			
21071 SK210923.1 – Lowfield Heath roundabout 2.6 Problem 4 Westbound uncontrolled crossing. The proposals lead to the widening of the west bound approach to the roundabout to three lanes at the uncontrolled pedestrian crossing point. It is virtually impossible for pedestrians, particularly the elderly, young and disabled to cross three lanes of live traffic in a safe manner. If pedestrians seek to cross between stationary or slow moving traffic driver visibility of the crossing movement and also pedestrian visibility of the	It is recommended that either the crossing location is removed, and pedestrians directed to the other side of the roundabout where maximum crossing distances are over two lanes or that a signal-controlled pedestrian crossing is provided.	The crossing location will be removed, and relocated on the southern arm of the junction as suggested.		Scheme drawing to be updated and finalised as drawing 21071 - 012.

5



RSA problem	RSA recommendation	Design organisation response	Overseeing Organisation response	Agreed RSA action
incoming vehicles is compromised leading to an increased risk of vehicle pedestrian collisions.				

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F5 - Design organisation and Overseeing Organisation statements

Table F.5 Overseeing Organisation Statement

On behalf of the Overseeing Organisation, I certify that:

- 1) the RSA actions identified in response to the road safety audit problems in this road safety audit have been discussed and agreed with the Overseeing Organisation, and
- 2) the agreed RSA actions will be progressed.

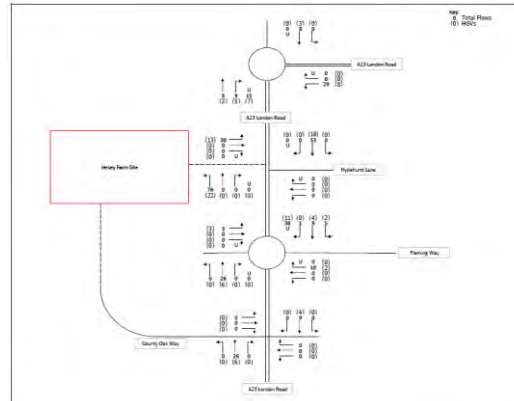
Name:	
Signed:	
Position:	
Organisation:	
Date:	

Table F.6 Design Organisation Statement

On behalf of the Design Organisation, I certify that the RSA actions identified in response to the road safety audit problems in this road safety audit have been discussed and agreed with the Overseeing Organisation.

Name:	Tim Britton
Signed:	Tim Britton
Position:	Associate Transport Planner
Organisation:	Connect Consultants Ltd
Date:	15 th October 2021

Appendix 4: Jersey Farm Traffic Distribution

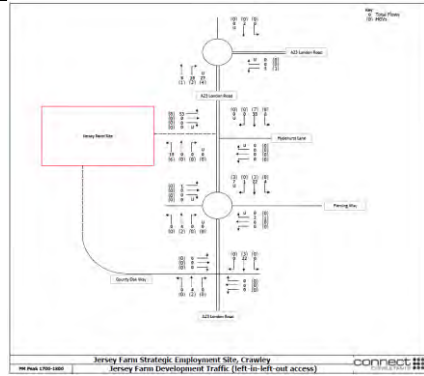


Jersey Farm Strategic Employment Site, Crawley
 Jersey Farm Development Traffic (left-in-left-out access)



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Appendix 5: Summary Arcady Assessment Results

Lowfield Heath Roundabout ARCADY Modelling Summary Results

No Jersey Farm						
	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
CBC LP1						
Arm OBR	8.5	33.12	0.91	3.7	15.15	0.8
Arm A23 N	26	36.44	0.99	3.6	3.3	0.79
Arm A23 S	1.6	5.58	0.61	7.3	19.35	0.89
CBC LP1 with Sust Mit						
Arm OBR	8.6	23.82	0.91	2.5	17.79	0.78
Arm A23 N	25.9	55.97	0.99	3.4	9.56	0.79
Arm A23 S	1.6	3.77	0.62	5.8	13.68	0.86
CBC LP3						
Arm OBR	10.3	35.52	0.93	14.1	46.38	0.97
Arm A23 N	45.4	88.06	1.03	4.6	11.87	0.83
Arm A23 S	1.5	3.23	0.6	7.2	18.43	0.89
CBC LP3 with Sust Mit						
Arm OBR	9.7	37.62	0.92	12.7	55.1	0.96
Arm A23 N	47.6	90.75	1.04	4.7	12.04	0.83
Arm A23 S	1.5	5.41	0.61	6.7	17.51	0.88
CBC LP3 with CWLR						
Arm OBR	14.1	69.5	0.97	7.3	37.11	0.9
Arm A23 N	16.1	37.39	0.96	106.3	177.67	1.11
Arm A23 S	27.3	76.32	1.02	33.2	68.89	1.01
CBC LP3 with CWLR with Sust Mit						
Arm OBR	11.4	59.01	0.95	5.4	28.31	0.86
Arm A23 N	9.3	22.87	0.92	46.3	85.86	1.03
Arm A23 S	61.6	116.11	1.06	22.2	30.5	0.98

With Jersey Farm with L10 access						
	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
Existing layout - CBC LP1 + JF L10						
Arm OBR	11.3	43.26	0.94	4.3	21.98	0.82
Arm A23 N	40.9	81.33	1.03	3.8	10.16	0.8
Arm A23 S	1.8	6.12	0.64	10.6	27.33	0.93
Existing layout - CBC LP1 with Sust Mit + JF L10						
Arm OBR	11.1	42.19	0.94	3.9	20.3	0.81
Arm A23 N	39.8	79.36	1.02	3.9	10.23	0.8
Arm A23 S	1.9	6.34	0.63	8	20.98	0.9
Existing layout - CBC LP3 + JF L10						
Arm OBR	14.2	51	0.96	15.9	77.97	0.99
Arm A23 N	71.7	130.93	1.07	5.2	13.41	0.85
Arm A23 S	1.6	5.62	0.62	10.7	26.63	0.93
Existing layout - CBC LP3 with Sust Mit + JF L10						
Arm OBR	13.2	50.2	0.95	18	75.1	0.99
Arm A23 N	74.3	133.94	1.08	5	13.02	0.84
Arm A23 S	1.7	5.89	0.63	10.1	25.59	0.92

With Jersey Farm with L10 access - Improved Layout 21071-012						
	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
Improved layout 21071-012 - CBC LP1 + JF L10						
Arm OBR	4.1	15.37	0.81	2.2	10.91	0.69
Arm A23 N	2.9	6.11	0.74	1.4	3.98	0.58
Arm A23 S	1.8	6.09	0.64	10	25.67	0.92
Improved layout 21071-012 - CBC LP1 with Sust Mit + JF L10						
Arm OBR	4.1	15.33	0.81	2.1	10.46	0.68
Arm A23 N	2.8	6.05	0.74	1.4	3.58	0.58
Arm A23 S	1.9	6.3	0.65	7.6	19.92	0.89
Improved layout 21071-012 - CBC LP3 + JF L10						
Arm OBR	4.6	16.97	0.83	4.7	20.01	0.83
Arm A23 N	3.4	7.09	0.78	1.6	3.97	0.62
Arm A23 S	1.6	3.66	0.62	10.3	25.38	0.92
Improved layout 21071-012 - CBC LP3 with Sust Mit + JF L10						
Arm OBR	4.4	16.48	0.82	4.6	19.61	0.83
Arm A23 N	3.3	7.13	0.78	1.6	3.93	0.61
Arm A23 S	1.7	5.93	0.64	9.6	24.29	0.92

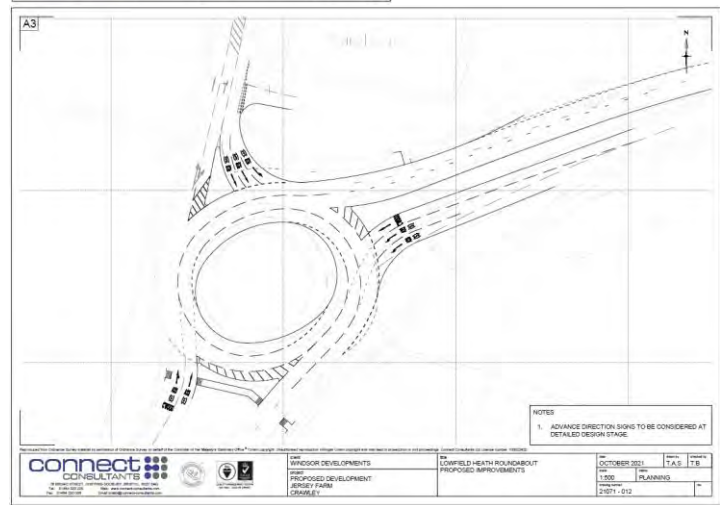
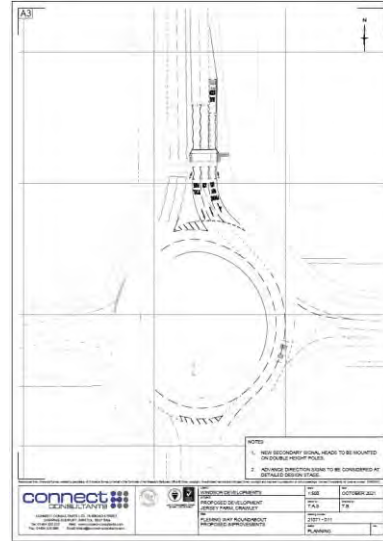
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Improved layout 21021 - 011</th> </tr> <tr> <th></th> <th colspan="2">AM</th> <th></th> <th colspan="2">PM</th> <th></th> </tr> <tr> <th></th> <th>Queue (Veh)</th> <th>Delay (s)</th> <th>RFC</th> <th>Queue (Veh)</th> <th>Delay (s)</th> <th>RFC</th> </tr> </thead> <tbody> <tr> <td colspan="7">Improved layout - CBC LP1 + JF Lilo</td> </tr> <tr> <td>Arm A23 N</td> <td>3.6</td> <td>5.38</td> <td>0.73</td> <td>1.1</td> <td>3.02</td> <td>0.53</td> </tr> <tr> <td>Arm Flemg</td> <td>1.3</td> <td>6.34</td> <td>0.36</td> <td>0.9</td> <td>5.56</td> <td>0.48</td> </tr> <tr> <td>Arm A23 S</td> <td>1.7</td> <td>5.16</td> <td>0.63</td> <td>1.2</td> <td>4.07</td> <td>0.55</td> </tr> <tr> <td>Arm Betts</td> <td>0.2</td> <td>3.79</td> <td>0.15</td> <td>0.8</td> <td>5.27</td> <td>0.44</td> </tr> <tr> <td colspan="7">Improved layout - CBC LP1 with Sust Mit + JF Lilo</td> </tr> <tr> <td>Arm A23 N</td> <td>2.8</td> <td>5.73</td> <td>0.74</td> <td>1.1</td> <td>3.01</td> <td>0.53</td> </tr> <tr> <td>Arm Flemg</td> <td>1.4</td> <td>7.23</td> <td>0.38</td> <td>0.9</td> <td>5.46</td> <td>0.48</td> </tr> <tr> <td>Arm A23 S</td> <td>1.7</td> <td>5.06</td> <td>0.63</td> <td>1.1</td> <td>3.92</td> <td>0.53</td> </tr> <tr> <td>Arm Betts</td> <td>0.3</td> <td>4.15</td> <td>0.24</td> <td>0.7</td> <td>4.97</td> <td>0.42</td> </tr> <tr> <td colspan="7">Improved layout - CBC LP3 + JF Lilo</td> </tr> <tr> <td>Arm A23 N</td> <td>3.6</td> <td>6.31</td> <td>0.79</td> <td>1.5</td> <td>3.5</td> <td>0.6</td> </tr> <tr> <td>Arm Flemg</td> <td>1.6</td> <td>8.03</td> <td>0.62</td> <td>0.9</td> <td>5.84</td> <td>0.46</td> </tr> <tr> <td>Arm A23 S</td> <td>1.7</td> <td>5.14</td> <td>0.64</td> <td>1.3</td> <td>4.2</td> <td>0.57</td> </tr> <tr> <td>Arm Betts</td> <td>0.2</td> <td>3.79</td> <td>0.15</td> <td>0.8</td> <td>5.33</td> <td>0.44</td> </tr> <tr> <td colspan="7">Improved layout - CBC LP3 with Sust Mit + JF Lilo</td> </tr> <tr> <td>Arm A23 N</td> <td>3.9</td> <td>7.57</td> <td>0.8</td> <td>1.4</td> <td>3.35</td> <td>0.58</td> </tr> <tr> <td>Arm Flemg</td> <td>1.8</td> <td>9.32</td> <td>0.65</td> <td>0.8</td> <td>5.61</td> <td>0.45</td> </tr> <tr> <td>Arm A23 S</td> <td>1.7</td> <td>5.09</td> <td>0.63</td> <td>1.2</td> <td>4.11</td> <td>0.56</td> </tr> <tr> <td>Arm Betts</td> <td>0.3</td> <td>4.2</td> <td>0.25</td> <td>0.8</td> <td>5.16</td> <td>0.43</td> </tr> </tbody> </table>	No Jersey Farm								AM			PM				Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC	CBC LP1							Arm A23 N	26.6	36.73	0.96	2.3	6.42	0.7	Arm Flemg	1.1	3.89	0.33	0.9	5.23	0.47	Arm A23 S	1.5	4.63	0.6	1.2	4	0.54	Arm Betts	0.2	3.5	0.13	0.8	5.17	0.44	CBC LP1 with Sust Mit							Arm A23 N	21.2	46.38	0.96	2.3	6.36	0.7	Arm Flemg	1.2	4.41	0.33	0.8	5.21	0.46	Arm A23 S	1.5	4.62	0.6	1.1	3.87	0.53	Arm Betts	0.3	3.85	0.23	0.7	4.9	0.42	CBC LP3							Arm A23 N	57.1	100.14	1.05	4	9.65	0.8	Arm Flemg	1.3	6.63	0.36	0.8	5.64	0.46	Arm A23 S	1.5	4.6	0.6	1.3	4.14	0.56	Arm Betts	0.2	3.31	0.14	0.8	5.26	0.44	CBC LP3 with Sust Mit							Arm A23 N	66.1	115.93	1.06	3.4	8.55	0.78	Arm Flemg	1.4	7.38	0.39	0.8	5.41	0.45	Arm A23 S	1.5	4.36	0.6	1.2	3.97	0.55	Arm Betts	0.3	3.88	0.24	0.7	5.04	0.42	CBC LP3 with CWLR							Arm A23 N	123.6	201.11	1.13	5	11.47	0.84	Arm Flemg	1.5	6.81	0.6	3.7	14.1	0.8	Arm A23 S	1.4	4.81	0.61	2	6.43	0.67	Arm Betts	0.3	4.06	0.25	1.1	8.3	0.53	CBC LP3 with CWLR with Sust Mit							Arm A23 N	118.8	194.28	1.12	3.2	7.81	0.76	Arm Flemg	1.4	6.35	0.59	2.3	9.31	0.7	Arm A23 S	1.4	4.79	0.61	1.7	5.54	0.63	Arm Betts	0.3	3.92	0.24	0.9	6.82	0.47	With Jersey Farm with Lilo access								AM			PM				Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC	Existing layout - CBC LP1 + JF Lilo							Arm A23 N	29.3	59.65	1	2.6	7.14	0.73	Arm Flemg	1.2	6.36	0.36	0.9	5.56	0.49	Arm A23 S	1.7	5.24	0.63	1.2	4.07	0.55	Arm Betts	0.2	3.79	0.15	0.8	5.27	0.44	Existing layout - CBC LP1 with Sust Mit + JF Lilo							Arm A23 N	38.3	74.7	3.02	2.6	7.1	0.73	Arm Flemg	1.3	6.51	0.37	0.9	5.46	0.48	Arm A23 S	1.7	5.04	0.63	1.1	3.92	0.53	Arm Betts	0.3	4.15	0.24	0.7	4.97	0.42	Existing layout - CBC LP3 + JF Lilo							Arm A23 N	85.9	147.28	1.58	4.5	10.8	0.82	Arm Flemg	1.4	6.57	0.38	0.9	5.84	0.46	Arm A23 S	1.7	5.08	0.63	1.3	4.2	0.57	Arm Betts	0.2	3.78	0.15	0.8	5.35	0.44	Existing layout - CBC LP3 with Sust Mit + JF Lilo							Arm A23 N	101.8	179.79	3.11	3.9	9.5	0.8	Arm Flemg	1.5	7.79	0.61	0.8	5.6	0.45	Arm A23 S	1.7	5.03	0.63	1.2	4.11	0.56	Arm Betts	0.3	4.19	0.25	0.8	5.16	0.43	With Jersey Farm with Lilo access - Improved layout 21021 - 011								AM			PM				Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC	Improved layout - CBC LP1 + JF Lilo							Arm A23 N	3.6	5.38	0.73	1.1	3.02	0.53	Arm Flemg	1.3	6.34	0.36	0.9	5.56	0.48	Arm A23 S	1.7	5.16	0.63	1.2	4.07	0.55	Arm Betts	0.2	3.79	0.15	0.8	5.27	0.44	Improved layout - CBC LP1 with Sust Mit + JF Lilo							Arm A23 N	2.8	5.73	0.74	1.1	3.01	0.53	Arm Flemg	1.4	7.23	0.38	0.9	5.46	0.48	Arm A23 S	1.7	5.06	0.63	1.1	3.92	0.53	Arm Betts	0.3	4.15	0.24	0.7	4.97	0.42	Improved layout - CBC LP3 + JF Lilo							Arm A23 N	3.6	6.31	0.79	1.5	3.5	0.6	Arm Flemg	1.6	8.03	0.62	0.9	5.84	0.46	Arm A23 S	1.7	5.14	0.64	1.3	4.2	0.57	Arm Betts	0.2	3.79	0.15	0.8	5.33	0.44	Improved layout - CBC LP3 with Sust Mit + JF Lilo							Arm A23 N	3.9	7.57	0.8	1.4	3.35	0.58	Arm Flemg	1.8	9.32	0.65	0.8	5.61	0.45	Arm A23 S	1.7	5.09	0.63	1.2	4.11	0.56	Arm Betts	0.3	4.2	0.25	0.8	5.16	0.43
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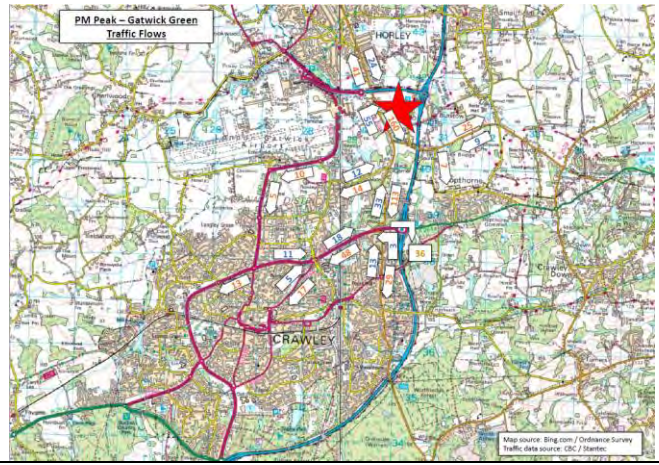
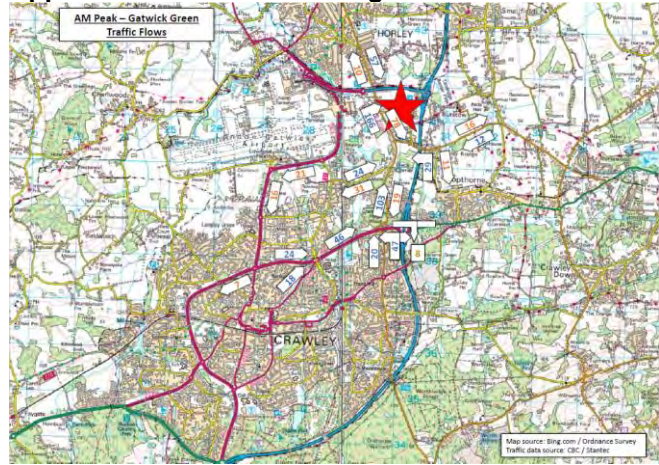
Appendix 6: Off-site Mitigation Schemes

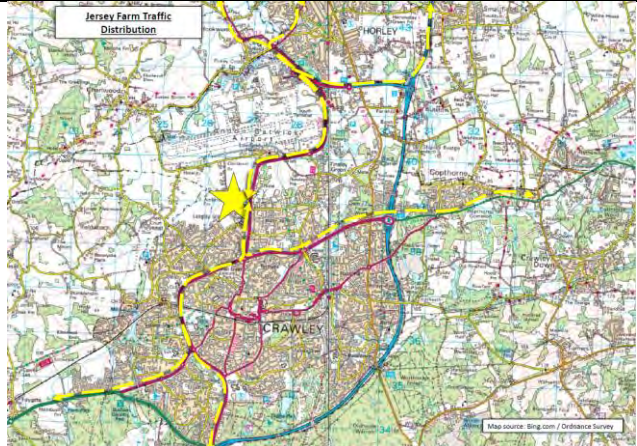


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Appendix 7: Traffic Flow Diagrams



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			 <p>Suggested Modifications: We therefore submit Policy EC4 is inconsistent with other Local Plan Review policies and national policy. This is due to the site being in an unsustainable location, disparate from the town and the local workforce, and it is therefore in conflict with policy ST1. It will fail to complement the town's main employment area at Manor Royal and therefore conflicts with Policy EC3. The fact that Policy EC4 seeks to defer a proper impact assessment until planning application, underlines the unjustified and ineffective nature of the policy. The allocation is also inconsistent with GAT2 as it fails to adequately address the impact on the use of the area for car parking and is inconsistent with GAT3 on airport related car parking. The allocation also fails to adequately address its impact on the countryside by introducing a significant scale of development in an area protected by countryside in the 2015 adopted local plan and outside the built-up area boundary, contrary to Policy CH9.</p>
REP/053 (2023)	Quod on behalf of Barker Trust	EC4	<p>The Draft Local Plan 2023 proposes the allocation of Strategic Employment Location at land east of Balcombe Road and south of the M23 spur, referred to as Gatwick Green. The Council consider this to be the only location in Crawley capable of providing the required quantum of industrial land and floorspace without prejudicing the possible future delivery of southern runway on the safeguarded land. We do not consider this site to be a suitable allocation based on a number of transport issues, the mitigation of which have not been provided as required by the NPPF. Even if this evidence was provided there is still outstanding requirement for industrial employment land.</p> <p>Document 2: Transport Appraisal Draft Crawley Local Plan 2024 – 2040, Submission Consultation Policy EC4: Strategic Employment Location Transport Appraisal For abrdn UK Real Estate Fund, in partnership with the Barker Trust (Motion, June 2023)</p>

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			<p>1.0 Introduction Preamble</p> <p>1.1 This report has been prepared on behalf of Aberdeen Standard Investments, in partnership with the Barker Trust (the Landowners) and considers transport matters relating to the proposed allocation of land at Gatwick Green in the Draft Crawley Local Plan 2021 – 2037, Submission Consultation (DCLP).</p> <p>1.2 The allocation of land at Gatwick Green ('Gatwick Green') is proposed through policy EC4 which anticipates, inter alia, a development comprising: a. Provide as a minimum 13.73ha 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.</p> <p>1.3 Development at Gatwick Green is being promoted by the Wilky Group and representations setting out the proposals are already submitted as part of the DCLP process.</p> <p>Alternative Employment Locations</p> <p>1.4 As an alternative to locating new industrial development at Gatwick Green, suitable and deliverable land is available for employment development by extending the established Manor Royal area, to the north of Hydehurst Lane (the 'Manor Royal Extension'). This land, being promoted by the Landowner, could accommodate circa 74,000sqm of new employment development and its location is shown on the plan provided at Appendix A.</p> <p>1.5 This report assesses the relationship of the Manor Royal Extension to the established walking, cycling, public transport and highway environment serving Manor Royal.</p> <p>Documents</p> <p>1.6 The primary source of evidence supporting the DCLP is the Crawley Transport Study, Transport Study of Strategic Development Options and Sustainable Transport Measures, Draft Crawley Local Plan 2021 – 2037 Revision E, which is prepared by Stantec UK Limited on behalf of Crawley Borough Council ('the Council') and dated 23rd June 2022 ('the Transport Study').</p> <p>1.7 Reference is also made to the Gatwick Green, Gatwick, Transport Strategy prepared by i-Transport on behalf of the Wilky Group ('the Wilky Transport Study') dated Date: 02 March 2020</p> <p>General Matters</p> <p>1.8 The Transport Study was first issued on 6 th April 2021. This is after the date of the DCLP (January 2021). It is difficult therefore to understand how the DCLP could possibly have been developed having regard to the traffic implications of the spatial strategy being promoted in the DCLP.</p>

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			<p>1.9 The DCLP would therefore appear to have been developed in isolation of understanding the optimal spatial distribution of future land uses across Crawley having regard to making best use of existing transport infrastructure, minimising unnecessary car travel and minimising adverse air quality impacts.</p> <p>1.10 Considering the timeline of the Transport Study production in more detail, the following is noted:</p> <ul style="list-style-type: none"> • December 2020 – Transport Study issued to the Council; • January 2021 – DCLP completed; • April 2021 – revised Transport Study issued to the Council; • May 2021 – further revisions to the Transport Study made and second revision issued to the Council; • September 2021 – third revision of the Transport Study issued to the Council; • May 2022 – Fourth revision of the Transport Study issued to the Council; and, • June 2022 – Current version of the Transport Study issued to the Council. <p>1.11 On the basis of the above timeline it is noted that:</p> <ul style="list-style-type: none"> • The DCLP was completed and issued without the benefit of a completed Transport Study; • There was a four-month hiatus between the Transport Study being completed and the first revision being issued to the Council; and • There was only a single month gap between the first revision and the second revision Transport Study being issued. <p>1.12 A four-month delay indicates that there were material changes made to the analysis and conclusions of the first draft Transport Study that extended beyond purely cosmetic changes. Knowing the DCLP consultation timetable and on the assumption that the Transport Study was undertaken by an experienced and competent transport consultant, it is difficult to understand why there was such a long gap between the Council receiving the results and conclusions of the Transport Study (December 2020) and finally issuing the Transport Study for public scrutiny (May 2021). This is especially the case when considering that there was only a 1-month delay between the first revision issue Transport Study (April 2021) and the final issue Transport Study (May 2021).</p> <p>1.13 Furthermore it is puzzling that, knowing that there was a further four-months' worth of transport and highway assessment and analysis to be undertaken to test and inform the development of the DCLP, that the Council nonetheless published the DCLP early in this extended assessment and analysis period.</p> <p>1.14 Based on the timetable set out above, it could be concluded that rather than informing the development of the DCLP, the DCLP has been fixed prior to the transport assessment and analysis work being completed. The Transport Study has subsequently been 'informed' by the fixed DCLP (January 2021) and revised accordingly and re-issued four-months later: a case of the tail wagging the dog.</p>

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			<p>1.15 In this context it is recommended that the conclusions of the Transport Study be read with caution as there is a prospect that they present a subjective appraisal of the DCLP rather than an objective and detailed analysis of transport issues affecting Crawley Borough.</p> <p>Scope of report</p> <p>1.16 This report comprises five sections in addition to the introduction as follows:</p> <ul style="list-style-type: none"> • Section 2 considers relevant transport policy; • Section 3 considers sustainable travel; • Section 4 considers highway access; and • Section 5 considers highway impact. <p>1.17 A summary is provided at Section 6 together with the conclusions which are that whilst it is noted that Draft Policy EC4 requires a transport assessment to be submitted with a future planning application for the development of Gatwick Green, the NPPF is very clear that potential site allocations should be appropriately assessed and based on the assessment of existing infrastructure and required infrastructure set out herein we consider that development at Gatwick Green:</p> <ul style="list-style-type: none"> • is unsustainable in transportation terms thereby failing to meet the requirements of paragraphs 105 and 110 (a) of the NPPF; • does not demonstrate that safe and suitable access (including access routes) can be achieved for all users thereby failing to meet the requirements of paragraph 110 (b) of the NPPF; • Relies on significant new infrastructure interventions that have neither been quantified nor demonstrated to be cost effectively deliverable thereby failing to meet the requirements of paragraph 110 (c) of the NPPF; • would result in an unacceptable impact on highway safety thereby meeting the test at paragraph 111 of the NPPF against which development should be prevented or refused; and • would result in severe residual cumulative impacts on the road network thereby meeting the test at paragraph 111 of the NPPF against which development should be prevented or refused. <p>1.18 As a consequence, we do not consider that the level of floorspace identified at Gatwick Green is deliverable. It should therefore be removed from the DCLP because it is undeliverable in terms of highways and transportation.</p> <p>1.19 In contrast, the Manor Royal Extension would benefit from:</p> <ul style="list-style-type: none"> • an established sustainable travel network thereby meeting the requirements of NPPF paragraphs 105 and 110; and • highway access routes with spare capacity to adequately accommodate traffic growth during the DCLP period thereby meeting the requirements of NPPF paragraph 110 (c).

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			<p>1.20 There is every prospect therefore that cost effective highway mitigation could be identified safely and suitably to accommodate additional traffic and travel demand arising from the Manor Royal Extension. Accordingly, it should be considered for inclusion in the DCLP as a sustainable site suitable for accommodating new employment development.</p> <p>2.0 Relevant Transport Policy</p> <p>2.1 The National Planning Policy Framework (NPPF) sets out a presumption in favour of sustainable development. It recognises the importance of transport policies in facilitating sustainable development, and that planning decisions should have regard to local circumstances.</p> <p>2.2 Paragraph 2 of the NPPF states that: ‘The National Planning Policy Framework must be taken into account in preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.’</p> <p>2.3 Section 9 of the NPPF deals with ‘Promoting Sustainable Transport’ with paragraph 104 stating the following: ‘Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: a) the potential impacts of development on transport networks can be addressed; b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated; c) opportunities to promote walking, cycling and public transport use are identified and pursued; d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.’</p> <p>2.4 Paragraph 105 continues: ‘The planning system should actively manage patterns of growth in support of these objectives [set out in paragraph 104]. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.’</p> <p>2.5 Paragraph 110 addresses the relationship between development and sustainable transport as follows: ‘In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; b) safe and suitable access to the site can be achieved for all users; c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National</p>

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			<p>Model Design Code; and d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.'</p> <p>2.6 The NPPF is therefore a material consideration in determining the soundness of a development plan and requires that the impacts on the transport environment associated with site allocations and subsequent design of infrastructure interventions should be sufficiently detailed to be able to understand the environmental impacts and financial costs of them.</p> <p>2.7 In particular it is emphasised that:</p> <ul style="list-style-type: none"> • Paragraph 105 states that 'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes'; and • Paragraph 110 (d) qualifies the provision of new infrastructure by inserting the term 'cost effectively'. <p>2.8 The NPPF clearly recognise that there is always an infrastructure solution to making any site 'sustainable'. However, these two statements underscore the Government's intent that in allocating land for development, local authorities should:</p> <ul style="list-style-type: none"> • first consider sites that are already sustainable; and then • consider the cost effectiveness of any infrastructure interventions required to cover residual shortfalls in infrastructure provision. <p>2.9 In short it is simply not sufficient to demonstrate that infrastructure can be provided: it must be demonstrated that existing sustainable travel opportunities have been exhausted, existing infrastructure efficiently utilised and only then, consider the provision of new infrastructure to mitigate any shortfalls which must be capable of being cost effectively delivered.</p> <p>2.10 Paragraph 111 of the NPPF sets out the test that a determining authority should apply when subsequently determining the suitability of a planning application in terms of transport and highways stating that: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."</p> <p>2.11 It is clear from the NPPF that planning permission for a development site will be refused if it would result in either an unacceptable impact on highway safety or a severe residual cumulative impact in the road network.</p> <p>2.12 In allocating a site for development, a planning authority must therefore be sure that there is a reasonable prospect that infrastructure interventions can be delivered that would mitigate highway safety and residual cumulative road network impacts to a sufficient extent that the development is acceptable within the terms of paragraph 111.</p>

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			<p>3.0 Sustainable Travel Journeys by foot</p> <p>3.1 The Chartered Institution of Highways and Transportation (CIHT) 'Guidelines for Providing for Journeys on Foot' (2000) suggests acceptable, desirable and preferred maximum walking distances ('acceptable' walking distances would vary between individuals). These walking distances are applied consistently when assessing the reasonable walking times whether a development is in a rural or an urban location.</p> <p>3.2 Table 3.1 summarises the suggested walking distances for pedestrians without mobility impairment for some common trip purposes.</p> <table border="1" data-bbox="707 536 1579 821"> <thead> <tr> <th></th> <th>Town Centres</th> <th>Commuting/ Schools</th> <th>Elsewhere</th> </tr> </thead> <tbody> <tr> <td>Desirable</td> <td>200</td> <td>500</td> <td>400 (5 minutes' walk)</td> </tr> <tr> <td>Acceptable</td> <td>400 (5 minutes' walk)</td> <td>1,000 (12.5 minutes' walk)</td> <td>800 (10 minutes' walk)</td> </tr> <tr> <td>Preferred Maximum</td> <td>800 (10 minutes' walk)</td> <td>2,000 (25 minutes' walk)</td> <td>1,200 (15 minutes' walk)</td> </tr> </tbody> </table> <p><i>Source: 'Providing for Journeys on Foot', CIHT, 2000</i></p> <p>Table 3.1: Reasonable Walking Distances (metres)</p> <p>3.3 More recent guidance is provided in Planning for Walking, Chartered Institution of Highways and Transportation ("CIHT Walking Guidance", April 2015) which sets out in section 6.4 advice on walking catchments as follows: "Walking neighbourhoods are typically characterised as having a range of facilities within 10 minutes' walking distance (around 800 metres).</p> <p>3.4 It is recognised that the above distances are not ceilings on how far people will reasonably walk to reach a facility but rather guidance on desirable distances to plan for. In this respect, it is instructive to refer to the National Travel Survey (NTS) findings on walk journeys in order to understand how far people will typically walk on a journey. The NTS identifies that 74% of journeys made on foot are shorter than 1,600 metres (source: table NTS0308a National Travel Survey 2019).</p> <p>3.5 Based on the above, it is reasonable to plan for people to walk up to 2,000 metres when commuting to a place of work albeit the NTS survey data suggests that only a minority of people would walk above 1,600 metres.</p> <p>3.6 The GIS software TRACC has been used to plot the walk catchments identified above which are:</p> <ul style="list-style-type: none"> • 800 metres – walkable neighbourhoods (CIHT – 2015); • 1,600 metres – NTS data; and • 2,000 metres – suggested maximum reasonable walk distance for commuting (CIHT - 2000). 		Town Centres	Commuting/ Schools	Elsewhere	Desirable	200	500	400 (5 minutes' walk)	Acceptable	400 (5 minutes' walk)	1,000 (12.5 minutes' walk)	800 (10 minutes' walk)	Preferred Maximum	800 (10 minutes' walk)	2,000 (25 minutes' walk)	1,200 (15 minutes' walk)
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			<p>3.7 The plot of the walk catchments is provided at Appendix B. This shows that there is very little residential development within a two kilometre walk distance of Gatwick Green. As a consequence, it can be expected that very few, if any commuter journeys to and from Gatwick Green would be made on foot.</p> <p>3.8 This relative remoteness has a secondary influence on how people might choose to travel to work. This relates to journeys made during the working day at lunchtime, for example to visit a bank, undertake top-up shopping, buy some lunch etc. or if journeys for other purposes are to be made during the working day (visit to the dentist for example). Due to the limited time available to undertake such journeys, they are most conveniently made on foot or by car due to the flexibility of these modes to fit around time constraints. Given the remoteness of Gatwick Green to facilities, it can be expected that many people will choose to drive to Gatwick Green in order to undertake such secondary journeys during the course of the working day.</p> <p>3.9 In contrast, the Manor Royal Extension is located within reasonable walk catchments of established facilities, amenities and residential areas (see Appendix C). Footways are provided along both sides of London Road with a signalised crossing just north of the Fleming Way roundabout which provides a traffic free route from the Manor Royal Extension to a number of retail uses, including a Tesco express, M&S food hall and Costa Express enabling future users to undertake convenience trips on foot. It can therefore be expected that commuter journeys to and from Gatwick Green would be made on foot.</p> <p>3.10 The Wilky Transport Study refers to guidance in TD91/05 regarding the willingness for people to walk distances greater than 2 miles (paragraph 4.2.2). For clarity TD91/05 has been withdrawn in its entirety by the Department for Transport (DfT). No weight should therefore be given to any part of TD91/05 or any reference thereto. All the design matters relating to journeys by foot in TD91/05 which the DfT considers to be currently relevant and accurate are included in CD143, which has replaced TD91/05 in its entirety. CD143 makes no reference to the distance people are willing to walk. The Design Manual for Roads and Bridges (DMRB) is therefore now not a document that provides any guidance or recommendations concerning how far people will walk and the historic reference to “2 miles” should no longer be relied upon. Journeys by Cycle</p> <p>3.11 The Chartered Institution of Highways and Transportation (CIHT) identifies that the bicycle is a potential mode of transport for all journeys under five miles (approximately 8 kilometres) (Planning for Cycling, 2015). Other research has suggested that a 5-kilometre catchment is likely to be the most attractive for encouraging motorists to switch to cycling.</p> <p>3.12 In this respect, it is again instructive to refer to the National Travel Survey (NTS) findings on cycle journeys in order to understand how far people will typically cycle on a journey. The NTS identifies that 46% of journeys made on cycle are shorter than 3.2 kilometres and 82% are shorter than 8 kilometres (source: table NTS0308a National Travel Survey 2019) supporting the statement in Planning for Cycling.</p> <p>3.13 The GIS software TRACC has been used to plot the cycle catchments identified above which are:</p>

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			<ul style="list-style-type: none"> • 3.2 kilometres – NTS data; • 5.0 kilometres – NTS data; and • 8 kilometres – suggested maximum reasonable distance for cycle journeys (CIHT - 2015). <p>3.14 The plot of the cycle catchments is provided at Appendix B. Based on the catchments shown, the distances suggest that there is a reasonable expectation that some journeys would be made by cycle subject to the provision of cycle infrastructure and safe routes.</p> <p>3.15 Turning to infrastructure for cyclists, there is no infrastructure for cyclists serving Gatwick Green. Gatwick Green is remote from existing cycle infrastructure and advisory cycle routes (see Crawley Cycle Network Map provided at Appendix D).</p> <p>3.16 The Site is accessed via the B2036 and B2037. In the vicinity of Gatwick Green, both of these routes are unlit rural roads subject to the national speed limit (60mph in this case). There is no provision for cyclists on either route. Cyclists share the carriageway with private and commercial traffic. The carriageway is circa 7.3m wide which is adequate for two-way vehicular traffic but insufficient for two-way traffic to safely pass a cyclist.</p> <p>3.17 Research shows that cyclists in particular have a much higher risk of being involved in a fatal collision on a rural road than elsewhere on the road network (RoSPA, Rural Road Safety Factsheet, February 2017).</p> <p>3.18 These deficiencies in the characteristics of the B2036 and B2037 with regards to cycling would be exacerbated during the hours of darkness or adverse weather.</p> <p>3.19 Based on the above, and in the absence of providing cycle infrastructure on the access routes to Gatwick Green, it can be concluded that neither the B2036 nor the B2037 are safe or suitable routes for encouraging cyclists to utilise in order to access Gatwick Green nor routes that are conducive to encouraging people to travel by cycle because:</p> <ul style="list-style-type: none"> • The routes are too narrow for cyclists and motor vehicles to pass safely; and • There is a higher risk of cyclists being involved in a fatal injury on roads such as these than other types of road which would deter people from cycling. <p>3.20 It is noted that neither the Transport Study nor the Wilky Transport Study identify how cycle infrastructure will be provided to serve Gatwick Green, neither the form of it nor if it can be delivered having regard to the fact that Balcombe Road is too narrow to accommodate cycle lanes and Gatwick Green is enclosed by third party land which would need to be crossed to deliver cycle routes. Indeed, the Transport Study provides an assessment of the impact of delivering a 'comprehensive cycle network – as detailed in Crawley's Local Cycling and Walking Infrastructure Plan (LCWIP)'. This document neither identifies Gatwick Green as present or future employment site nor does it identify a present or future cycle route in the vicinity.</p>

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			<p>3.21 As a consequence, it can be expected that very few, if any, journeys would be made by cycle.</p> <p>3.22 Development at Gatwick Green will result in a significant increase in vehicles using the B2036 as set out in Section 4 below. An increase in the number of vehicles using the B2036 (Balcombe Road) would exacerbate the existing deficiencies for cyclists travelling in the road. It is likely that such an increase in traffic travelling in the road, especially an increase in the HGV component of the traffic, would further discourage people from accessing Gatwick Green by cycle. This would be due to the combination of an increased risk of collision and a reduction in amenity arising from an increased volume of traffic as well as an increase in fear and intimidation associated with HGV volumes.</p> <p>3.23 In contrast, the Manor Royal Extension would have direct access to the established Crawley Cycle Network (see Appendix D). Connections to the network could be achieved via land in control of the Landowners at Manor Royal Extension. It can therefore be reasonably expected that journeys would be made to and from the Manor Royal Extension by cycle.</p> <p>Journeys by Bus</p> <p>3.24 There are currently no bus services located within reasonable walking distance of Gatwick Green. In the absence of the provision of new bus services, there is very little prospect of people travelling to and from Gatwick Green by bus.</p> <p>3.25 The Wilky Transport Study refers to dialogue purported to have taken place with the local Fastway Bus Operator. This sets out a range of aspirations but presents no evidence that development at Gatwick Green would:</p> <ul style="list-style-type: none"> • be directly served by bus; or • benefit from a high frequency of bus service; or • would be accessible to a wide range of destinations. <p>3.26 Experience of stand-alone commercial development of this scale elsewhere demonstrates that it is extremely difficult to provide and maintain frequent and diverse bus provision on a commercial basis. As examples of what may be reasonably expected in relation to a stand-alone development such as Gatwick Green with no existing bus provision:</p> <ul style="list-style-type: none"> • Tesco Distribution Centre, Reading. Total of 87,000sqm of B8 development. Located 4.5km walk distance south of the centre of Reading and 2.8km walk distance from the centre of the Three Mile Cross / Spencers Wood / Shinfield area of Wokingham. Circa 1,200 jobs. Currently fully operational. Bus access catered for by diversion of nearby bus route for approximately 20 minutes during each shift change hour (05:24 – 05:44, 13:31 – 13:43 and 21:24-21:50). No bus services outside of these times. No conventional work-day hours' (09:00 - 17:30) service.

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			<ul style="list-style-type: none"> Thames Valley Science Park, Wokingham. Total of 75,690sqm of Research and Development and light industrial floor space. Located adjacent to major residential development of 2,500 new houses and 3km north of further major residential development of 3,500 new houses. Yet to be completed and occupied. Aspirational aim to be served by four buses per hour as part of a network serving the combined 6,000 new dwellings located nearby. Buses serving the new residential development pass / will pass the Thames Valley Science Park. <p>3.27 What can be seen from the above is that a standalone strategic industrial development of the scale of Gatwick Green is unlikely to generate sufficient demand to enable a full-time permanent bus service to be commercially provided. So, whilst some employees may be able to travel to and from work by bus, this is only at limited times. Employees who require some flexibility in their work / life balance are therefore likely to choose to drive.</p> <p>3.28 Furthermore, whilst the Thames Valley Science Park could have a regular bus service available, this is reliant on significant residential development being delivered nearby. Effectively the Thames Valley Science Park is relying on “existing” bus services that are being operated on a commercial basis.</p> <p>3.29 In this context and having regard to the relative remoteness of Gatwick Green and paucity of existing bus provision, there is no evidence provided in support of the DCLP to indicate that a range of bus routes serving a variety of destinations could be delivered to support development at Gatwick Green.</p> <p>3.30 In contrast there is an established range of bus services operating within approximately 10 minutes’ walk of the Manor Royal Extension which serve the existing Manor Royal area. These serve a variety of destinations including Crawley, Three Bridges, Redhill, Gatwick Airport, Bewbush and Pound Hill. It can therefore be reasonably expected that journeys would be made to and from the Manor Royal Extension by existing bus services.</p> <p>Journeys by Rail</p> <p>3.31 Considering the CIHT guidance it is reasonable to assume that a person would walk up to 800m to reach a railway station. Walking at an average speed of 1.33m/s, this equates to a walk that lasts for around 10 minutes. Further guidance provided by Transport for London and used in calculating the level of accessibility to public transport suggest that people would walk up to 960m to a railway station.</p> <p>3.32 Spatially the nearest railway station is located at Gatwick Airport. This is a distance of approximately 1,700m from the centre of the Site. The Transport Strategy states that access to the railway station is possible via existing pedestrian facilities on Buckingham Gate. However, signage on site at Buckingham Gate is very clear that this is private property. There is no existing public right of way. This indicates that there is in fact no general pedestrian access to the Gatwick Airport railway station from the B2036 via Buckingham Gate. People</p>

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			<p>wishing to walk to and from the railway station from and to the Site will instead have a long and circuitous walk to reach it.</p> <p>3.33 As a consequence, the nearest accessible railway station is Horley railway station to the north. This is located an approximately 2,300m walk from the centre of the Site.</p> <p>3.34 Based on the distance between the Site and the nearest railway stations (including if a general right of access for pedestrians along Buckingham Gate can be achieved) it can be expected that very few, if any, connecting journeys would be made by foot.</p> <p>3.35 It is possible, based solely on distance, that people might cycle to the railway station (s). However, given the deficiencies set out above with regards to cycling on the access routes to Gatwick Green, the prospect of many (if any) people undertaking such a combined trip is very unlikely.</p> <p>3.36 As a consequence of the above, it can be expected that very few, if any, journeys would be made by rail.</p> <p>3.37 In contrast, whilst the Manor Royal Extension would be located further than the reasonable walking distance to and from a railway station, it benefits from access to an established cycle network and bus network that facilitate safe and convenient linkages to train services. It can therefore be reasonably expected that journeys would be made to and from the Manor Royal Extension by rail.</p> <p>4.0 Highway Access Magnitude of Vehicular Trips</p> <p>4.1 Policy EC4 identifies an area of land for commercial development (c.14ha) but does not specify a limit on floorspace nor a preferred mix of uses. The Council's viability assessment and Employment Land Trajectory assumes a total floor area of 41,315 sqm of industrial land for predominantly B8 storage and distribution use.</p> <p>4.2 The Transport Study at paragraph 7.7.1 suggests that Gatwick Green could result in an additional:</p> <ul style="list-style-type: none"> • 333 two-way vehicle trips during the morning peak hour; and • 298 two-way vehicle trips during the evening peak hour. <p>4.3 The above is based on an assumed split of 30% B2 land uses and 70% B8 land uses of which 60% would be Warehousing (Commercial) and 10% Parcel Distribution (paragraph 4.2.1 bullet 5). The Transport Study also notes that a significant proportion of trips would be freight/ HGV. It should be noted that the above figures are based on the following:</p> <ul style="list-style-type: none"> • B8 Parcels Distribution (10%) or 7,750 sqm • B8 Commercial Warehousing (60%) or 46,500 sqm • B2 Industrial estate (30%) or 23,250 sqm • Total – 77,500 sqm <p>4.4 It is not clear from the Transport Study how the peak hour traffic volumes for Gatwick Green have been calculated. It is important to understand that B8 Storage and Distribution land uses can result in significant</p>

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variations in traffic volumes subject to the type of end user. The table below provides a forecast of week-day peak hour and week-day 12-hour traffic flows for B2 (light industrial) uses and a variety of permitted uses that fall within the B8 land use class. The calculations assume 77,500sqm of a single land use. The data used to arrive at the traffic forecasts is provided at Appendix E.

Time Period	LAND USE							
	B2 Industrial		B8 Warehousing (Commercial)		B8 Warehousing (self-storage)		B8 Parcel distribution	
	All traffic	HGV	All traffic	HGV	All traffic	HGV	All traffic	HGV
AM Peak	429	36	214	74	117	26	677	145
PM Peak	378	19	185	61	129	0	862	105
12-hour	4362	409	2048	736	2399	105	8522	1747

Table 4.1: Potential Traffic Volumes associated with a single industrial use located at Policy EC4

4.5 The table above shows that if Gatwick Green was developed entirely for B8 parcel distribution purposes, there could be a total of 677 two-way vehicle movements during the morning peak hour and 862 twoway vehicle movements during the evening peak hour. Over a 12-hour weekday period (07:00-19:00) a total of 1,747 additional lorry movements could be expected on the local road network. In the absence of any policy restrictions on floor areas, assuming that only 10% of the floor space would be used for parcel distribution therefore potentially significantly underestimates the volume of traffic and hence traffic impacts.

4.6 However even if the split of floor space identified in the Transport Study is correct, it is unclear how the peak hour traffic volumes have been arrived at. The table below provides a summary of peak hour and 12-hour traffic volumes based on the data summarised in Table 4.1.

Time Period	Land Use Mix as per Transport Study paragraph 4.2.1	
	All traffic	HGV
AM Peak	325	70
PM Peak	311	53
12-hour	3389	739

Table 4.2: Potential Traffic Volumes associated with Transport Study mix of industrial uses located at Policy EC4

4.7 The table above shows that on the basis of the mix of land uses suggested in the Transport Study, a total of 325 two-way vehicle movements could be expected to arise from Gatwick Green during the morning peak hour with 311 during the evening peak hour. Both these forecasts are broadly in line with the 333 and 298 two-way vehicle movements forecast for the morning and evening peak hours respectively in the Transport Study. A total

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of 4,598 two-way vehicle movements could be expected over a 12-hour period (07:00-19:00) of which 788 would be HGV movements.

4.8 Notwithstanding this, it is again emphasised that Draft Policy EC4 does not place any restrictions or limits on the extent that Gatwick Green could be developed for different industrial and / or storage and distribution purposes. An alternative mix of land uses has therefore been considered to understand how sensitive traffic generation is to a change in land use mix. The sensitivity test assumes a split of 30% B2 land uses and 70% B8 land uses, with the B8 split evenly between warehousing (commercial, warehousing (self-storage) and Parcel Distribution. A summary of the traffic forecasts are provided below.

Time Period	30% B2 Industrial, 23.3% B8 Warehousing (Commercial), 23.3% B8 Warehousing (self-storage), 23.3% B8 Parcel distribution	
	All traffic	HGV
AM Peak	364	68
PM Peak	388	44
12-hour	4335	727

Table 4.3: Potential Traffic Volumes associated with a mix of industrial uses located at Policy EC4

4.9 Table 4.3 shows that, based on the mix of land uses assumed, industrial development at Gatwick Green could result in a total of 364 two-way traffic movements during the weekday morning peak hour (compared to 333 forecast in the Transport Study) and 388 traffic movements during the weekday evening peak hour (compared to 298 in the Transport Study). Over the course of a day a total of 4,335 two-way vehicle movements could be expected of which 727 would be HGVs.


4.10 This demonstrates that just a minor tweak in the land use mix can result in a material increase in road traffic. Again, there is no sensitivity test in the Transport Study to determine how resilient the future transport network would be to minor changes in land use mixes, such as these, which would not be controlled or prevented by the DCLP.

Highway Network

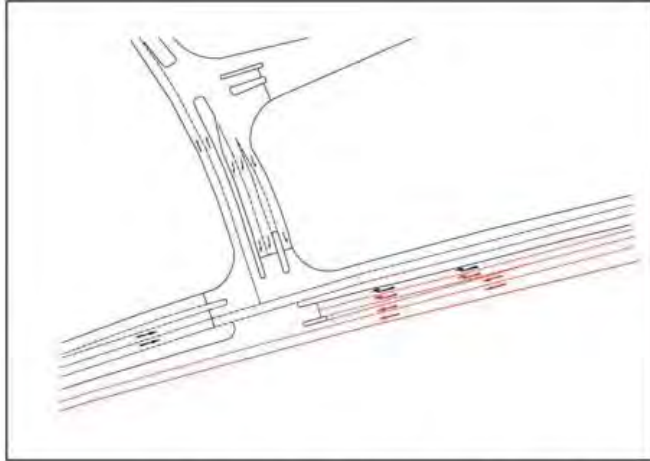
4.11 Unlike other allocations such as Horley Business Park, or other potential industrial sites such as the Manor Royal Extension, there is no direct vehicular access route to Gatwick Green from the strategic road network (SRN), which is formed by the M23 in this location.

4.12 The figure below shows the current vehicular access routes between Gatwick Green and the SRN.

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			 <p data-bbox="712 1134 1151 1153">Figure 4.1 - HGW Access Routes between Gatwick Green and the SRN</p> <p data-bbox="696 1166 1839 1198">4.13 As shown on the figure above, vehicular access to the SRN is currently achieved via either:</p> <ul data-bbox="696 1201 2016 1294" style="list-style-type: none"> • Brighton Road through the centre of Horley and then south on Balcombe Road (the light blue line on Figure 4.1); or • A2011 and then north on Balcombe Road (the purple line on Figure 4.1). <p data-bbox="696 1310 1151 1342">4.14 Considering these routes in turn:</p> <p data-bbox="696 1358 1619 1390">London Road through the centre of Horley and then south on Balcombe Road</p>

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			<p>4.15 This route would route traffic associated with Gatwick Green through the centre of Horley either via the junction of Brighton Road / Balcombe Road or more likely via Massetts Road / Victoria Road (the dashed light blue line on Figure 4.1) which is a significantly shorter route.</p> <p>4.16 In both cases the route brings the industrial traffic through the centre of Horley and through areas which are predominantly residential. Given the significant peak hour traffic volumes (300-400 vehicles during both peak hours) that would arise as a consequence of Policy EC4, significant detrimental highway capacity impacts can be expected. The addition of over 700 HGV movements on these local streets and roads will result in detrimental impacts on air quality, noise and resident amenity.</p> <p>4.17 Notwithstanding these potentially significant traffic and environmental impacts, the Council's evidence base does not appear to assess the extent of these impacts and hence offer mitigation.</p> <p>A2011 and then north on Balcombe Road.</p> <p>4.18 Currently, the junction of Balcombe Road / A2011 has west facing slips only. Traffic approaching Gatwick Green from the SRN utilising this route would be required to continue past Balcombe Road, u-turn at the Hazelwick roundabout and then use the exit slip road to join Balcombe Road.</p> <p>4.19 Traffic exiting Gatwick Green to reach the SRN via this route would need to join the A2011 in a westbound direction, continue westbound along the A2011 and then u-turn at the Hazelwick roundabout to return past Balcombe Road to reach the SRN.</p> <p>4.20 In both cases, this will result in unnecessary increases in road mileage, especially HGV traffic travelling to and from the SRN with associated Air Quality and noise impacts. A potential additional 4,300 vehicles or more u-turning at the Hazelwick roundabout each weekday will result in significant adverse impacts on capacity at this location.</p> <p>4.21 Notwithstanding these potentially significant traffic and environmental impacts, the Council's evidence base does not appear to assess the extent of these impacts and hence offer mitigation.</p> <p>4.22 Moreover, given the choice of the two routes, the route via Massetts Road and Victoria Road is likely to prove more attractive as it does not involve duplication of route.</p> <p>Proposed Network Changes</p> <p>4.23 A review of the Transport Study reveals that the DCLP is wholly reliant on the implementation of a new junction arrangement at the B2011 / Balcombe Road. Notwithstanding the reliance on this new junction arrangement, the Council fails to provide details of it.</p> <p>4.24 A review of various other documents has revealed the following potential layout for the junction:</p>

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			 <p>Figure 15: A2011 Crawley Avenue / B2036 Balcombe Road – Improved Right Turn Capacity and Localised Carriageway Widening</p> <p>Source: Crawley Borough Council Local Plan Transport Strategy LPTS Stage 2 Report (Amey, August 2014 prepared for Crawley Borough Council).</p> <p>4.25 However the following comment made by West Sussex County Council (WSCC) is presented in Appendix G of the Transport Study. 'There is a difference between the WSP plan as supplied and the agreement plan which I could not obtain permission to supply. This affects node 1690 at the A2011 end of the link. The agreement plan only has one right turn lane from A2011 for the east to north move. This is as per the planning stage plan, with the second lane having coming [sic] from the Local Plan mitigation strategy for other post-NE Sector development. I suggest we reduce to one right turn lane for the reference case. We can save the second lane for Local Plan scenarios.'</p> <p>4.26 WSCC refers above to a "WSP plan" and an "agreement plan" neither of which are presented by the Council in their evidence base. WSCC also refers to a "planning stage plan" which appears to be associated with a planning application for what is referred to as the "NE Sector" (planning application reference CR/2015/0552/NCC). A review of the planning portal identifies the following junction layout for a new junction on the A2011.</p>

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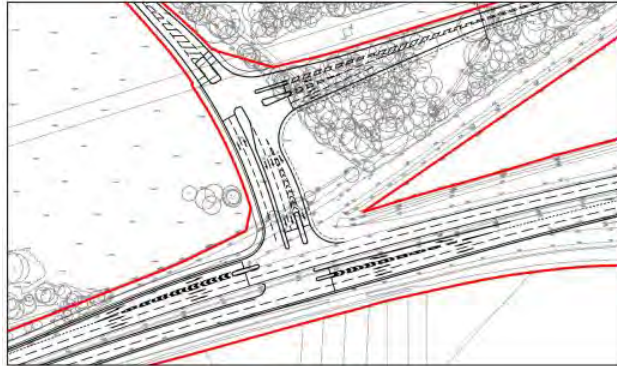


Figure 4.2 - Planning Stage Plan for A2011 Signal Junction

4.27 The Planning Stage Plan also includes a proposal to introduce a new signal junction on Balcombe Road as shown below:



Figure 4.3 - Planning Stage Plan for Balcombe Road Signal Junction

4.28 As can be seen, the Planning Stage Plan will remove free flow conditions on the A2011 and the west facing slips and replace these with a series of three signal junctions connected by a link road. Traffic travelling from the SRN to Gatwick Green will be able to use a single right turn lane to turn north to reach a second set of traffic signals. At this point a single right turn lane is provided for traffic to turn eastwards along a new link road to reach a third set of traffic signals.

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			<p>4.29 The reverse manoeuvre is achieved by southbound traffic on Balcombe Road turning right in a right turn flare lane (shared with a straight ahead lane) to travel westbound along a new link road. Traffic then turns left in a single lane (shared with a right turn flare lane) at a second set of traffic signals and then left again at a third set of traffic signals.</p> <p>4.30 This proposed new junction system, which facilitates all moves between Balcombe Road and the A2011, would provide a more direct access route for traffic travelling between Gatwick Green and the SRN. The delivery of the junction system in the format shown in figures 4.2 and 4.3 above is designed to accommodate and linked to the occupation of the NE Sector development.</p> <p>4.31 However, the Council has failed to demonstrate:</p> <ul style="list-style-type: none"> • that the junction system as proposed (designed to accommodate traffic arising from the NE Sector) can accommodate the volume and type of traffic that would arise from Policy EC4; or • that improvements to the junction system to satisfactorily accommodate traffic arising from Policy EC4 are deliverable. <p>4.32 Instead, the Council appears to be wholly relying on a “second lane” being deliverable by some party at some point in the future. The potentially severe consequences of this approach are discussed in Section 5 below.</p> <p>5.0 Residual Cumulative Impacts Planning Stage Plan for A2011 and Balcombe Road Signal Junction System</p> <p>5.1 Detailed junction modelling of this proposed junction was undertaken by the applicants for the NE Sector planning application (the ‘NES Modelling’). Relevant extracts of the NES Modelling are provided at Appendix F.</p> <p>5.2 The NES Modelling took 2018 as its future development year. This clearly pre-dates the commencement of the DCLP (2021) and the end of the DCLP period (2037). It can, however, be taken to give an indication of ‘current’ traffic conditions with the NE Sector development fully occupied but no development associated with the DCLP.</p> <p>5.3 The table below provides a summary of the submitted and agreed (by WSCC and Highways England) junction analysis for critical links.</p>

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			<table border="1"> <thead> <tr> <th rowspan="2">Time Period</th> <th rowspan="2">Movement</th> <th>Forecast Traffic Flow</th> <th>Saturation</th> <th>Queue Length</th> <th colspan="2">Queue length capacity</th> </tr> <tr> <th>PCU</th> <th>%</th> <th>PCU</th> <th>PCU</th> <th>Articulated Lorries</th> </tr> </thead> <tbody> <tr> <td>Morning Peak Hour</td> <td>Right turn from Balcombe Road into link road</td> <td>358</td> <td>97.2</td> <td>14.2</td> <td>7</td> <td>2</td> </tr> <tr> <td>Evening Peak Hour</td> <td>Right turn from Balcombe Road into link road</td> <td>362</td> <td>68.2</td> <td>5</td> <td>7</td> <td>2</td> </tr> <tr> <td>Morning Peak Hour</td> <td>Right turn from A2011 into Link Road</td> <td>65</td> <td>44.3</td> <td>2.2</td> <td>19</td> <td>6</td> </tr> <tr> <td>Evening Peak Hour</td> <td>Right turn from A2011 into Link Road</td> <td>158</td> <td>88</td> <td>7.4</td> <td>19</td> <td>6</td> </tr> <tr> <td>Morning Peak Hour</td> <td>Left turn from Link Road to A2011</td> <td>153</td> <td>29.5</td> <td>3.7</td> <td>10</td> <td>3</td> </tr> <tr> <td>Evening Peak Hour</td> <td>Left turn from Link Road to A2011</td> <td>104</td> <td>23.5</td> <td>2.7</td> <td>10</td> <td>3</td> </tr> </tbody> </table> <p>Table 5.1 – Balcombe Road / A2011 Proposed New Junction Performance 2018</p> <p>5.4 The table above shows that the right turn from Balcombe Road into the Link Road during the morning peak hour in 2018, is expected to be almost 100% saturated. This means that there is little capacity left for additional traffic. Of interest is that the queue for this movement is modelled to be 14.2 PCUs. Review of the Planning Stage Plans shows that the right turn lane can actually only accommodate 7 PCUs. This means that during the morning peak hour, traffic waiting to turn right will block the straight ahead movement. Whilst already permitted, the analysis shows that this junction will fail during the morning peak hour.</p> <p>5.5 Turning to other links, it is noted that the right turn from the A2011 into the Link Road during the evening peak hour results in a saturation level of 88%. This means that there is some spare capacity for this movement in 2018.</p> <p>5.6 Notwithstanding this, it is noteworthy that the traffic volumes used to assess the performance of the junction were forecast prior to the DCLP and hence do not include traffic associated with, inter alia, Policy EC4. This is immediately apparent when one considers the morning peak hour traffic forecast for traffic turning right from the A2011 into the link road which is only 65 PCUs. This compares to a forecast morning peak hour traffic volumes in excess of 300 PCUs for Gatwick Green, including a number of HGVs, which equate to as much as 2.3 PCUs per vehicle.</p> <p>5.7 Also noteworthy is the relative performance of this right turn movement between the morning and evening peak hours. An increase in traffic volume from 65 PCUs in an hour to 158 PCUs in an hour results in a reduction in junction performance from 44.3% saturated to 88% saturated. Queues increase from 2.2 PCUs to 7.4 PCUs. Such a significant reduction in junction performance from a relatively modest increase of less than 100 PCUs indicates how sensitive this right turn movement is to changes in traffic volumes.</p> <p>5.8 The right turn movement would clearly be unable to cope with several hundred additional right turning movements associated with Policy EC4 in the absence of additional infrastructure interventions. Whilst WSCC indicates that the provision of a second right turn lane at this location could address this infrastructure failure, the DCLP fails to identify that this infrastructure intervention is required or furthermore, that it could be delivered given land ownership around the junction.</p>	Time Period	Movement	Forecast Traffic Flow	Saturation	Queue Length	Queue length capacity		PCU	%	PCU	PCU	Articulated Lorries	Morning Peak Hour	Right turn from Balcombe Road into link road	358	97.2	14.2	7	2	Evening Peak Hour	Right turn from Balcombe Road into link road	362	68.2	5	7	2	Morning Peak Hour	Right turn from A2011 into Link Road	65	44.3	2.2	19	6	Evening Peak Hour	Right turn from A2011 into Link Road	158	88	7.4	19	6	Morning Peak Hour	Left turn from Link Road to A2011	153	29.5	3.7	10	3	Evening Peak Hour	Left turn from Link Road to A2011	104	23.5	2.7	10	3
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			<p>5.9 The analysis summary also identifies that the right turn from Balcombe Road into the Link Road has been designed to cope with a mere 358 PCUs during the morning peak hour. Even in this scenario, the queue of right turning traffic waiting at the new junction would be longer than the right turning lane provided for it. This right turn movement would clearly be unable to cope with additional right turning movements in the absence of additional infrastructure interventions.</p> <p>5.10 Based on the above analysis, it is concluded that the proposed new A2011/ Balcombe Road junction system as permitted, was planned to accommodate traffic arising from the permitted NE Sector development, but only to accommodate traffic from this development. There is very little spare capacity in the permitted junction system to accommodate traffic from other development. Indeed, the right turn lane for traffic turning from Balcombe Road to the A2011 link road is unable to even accommodate forecast queues associated with the NE Sector.</p> <p>5.11 As a consequence, traffic arising from Policy EC4 would block back onto the carriageway at these junctions resulting in unacceptable highway safety impacts and sever residual impacts on the road network.</p> <p>5.12 It is accepted that in the face of severe queues and delays at this junction traffic arising from Policy EC4 may choose alternative routes to travel between the development and the SRN. However as described in Section 4, the alternative routes would route traffic, including HGV traffic, through town centre and residential areas with the resulting adverse highway capacity, air quality, noise and amenity impacts which simply have not been assessed in the DCLP.</p> <p>Transport Study Modelling</p> <p>5.13 Tables 5-1 and 5-2 of the Transport Study identify that in the reference case and for all three scenarios tested, the new A2011 Boscombe Road signal junction is significantly over capacity. This compares to the Tushmore Gyratory and the Hazelwick Roundabout, both of which have significant amounts of spare capacity throughout most of the day in all scenarios.</p> <p>5.14 Tables 7-2 and 7-3 of the Transport Study show that with Gatwick Green fully occupied and after the proposed sustainable mitigation measures identified in the Transport Study have been taken into account, the new A2011 Boscombe Road signal junction continues to fail both on the A2011 and on Balcombe Road. This is notwithstanding the significant underestimate of the volume of traffic arising from Gatwick Green used in the Transport Study. The addition of several hundred additional vehicle movements would further worsen predicted conditions at these locations. This aligns with the outcomes of the NES Modelling.</p> <p>5.15 The Transport Study purports to have considered further mitigation at the new A2011 Boscombe Road signal junction and claims (paragraph 7.5.6, Scenario 2 bullets iii. And iv.) that the significant over capacity</p>

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			<p>outcomes identified in the assessment could be overcome stating: 'It is considered that in both the AM and PM peaks, signal optimisation addresses the Local Plan impacts.'</p> <p>5.16 The Transport Study however fails to present any evidence that this hypothesis is correct. Instead, it merely makes the assertion that severe traffic problems at a junction that is already significantly overcapacity in the reference case, before the several hundred vehicle movements associated with Gatwick Green are added to existing demands, can be resolved by "tweaking" the signals.</p> <p>5.17 Moreover, it is noted that the new A2011 Boscombe Road signal junction has yet to be built. If the Transport Study is correct in its hypothesis that optimisation of the signals will resolve the impacts arising from Policy EC4 in the DCLP, then this will have meant that a new signal junction will have been designed and built with the intention of it operating sub-optimally otherwise there would be no scope for the significant, further optimisation required to accommodate Gatwick Green. This proposition is simply not credible and one which should be given no weight.</p> <p>5.18 In reality, as shown by the NES Modelling and confirmed by the Transport Study, the new A2011 Boscombe Road signal junction has been designed to "just about" accommodate traffic arising from the NE Sector development but not to accommodate traffic arising from Gatwick Green. As a consequence, in the absence of further physical infrastructure interventions to provide the capacity necessary, traffic arising from Policy EC4 would block back onto the carriageway at these junctions resulting in unacceptable highway safety impacts and severe residual impacts on the road network.</p> <p>5.19 In comparison, the Transport Study identifies that both the Tushmore Roundabout and Hazelwick Roundabout would operate with spare capacity for much of the time in the reference case. These are the two junctions that would be most used by traffic travelling to and from the Manor Royal Extension. In this context it is difficult to understand why the DCLP should be proposing to allocate significant commercial development at a location at which the highway network is predicted to already be over capacity before the development even commences when there is an alternative location that benefits from residual highway capacity.</p> <p>6.0 Summary and Conclusions Sustainable Travel Journeys by Foot</p> <p>6.1 Very little residential development is located within a 2km walk distance of Gatwick Green. As a consequence, it can be expected that very few, if any commuter journeys to and from Gatwick Green would be made on foot.</p> <p>6.2 This relative remoteness has a secondary influence on how people might choose to travel to work. This relates to journeys made during the working day at lunchtime, for example to visit a bank, undertake top-up shopping, buy some lunch etc. or if journeys for other purposes are to be made during the working day (visit to the dentist for example). Due to the limited time available to undertake such journeys, they are most conveniently</p>

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			<p>made on foot or by car due to the flexibility of these modes to fit around time constraints. Given the remoteness of Gatwick Green to facilities and amenities that are commonly accessed by people at work, it can be expected that many people will choose to drive to Gatwick Green in order to undertake such secondary journeys during the course of the working day.</p> <p>6.3 In contrast, the Manor Royal Extension is located within reasonable walk catchments of established facilities, amenities and residential areas. Footways are provided along both sides of London Road with a signalised crossing just north of the Fleming Way roundabout which provides a traffic free route from the Manor Royal Extension to a number of retail uses, including a Tesco express, M&S food hall and Costa Express enabling future users to undertake convenience trips on foot. It can therefore be expected that commuter journeys to and from Gatwick Green would be made on foot.</p> <p>Journeys by Cycle</p> <p>6.4 The Gatwick Green cycle catchments suggest that there is a reasonable expectation that some journeys would be made by cycle subject to the provision of cycle infrastructure and safe routes.</p> <p>6.5 However, there is no infrastructure for cyclists serving Gatwick Green. Gatwick Green is remote from existing cycle infrastructure and advisory cycle routes. In the absence of providing cycle infrastructure on the access routes to Gatwick Green, it can be concluded that neither the B2036 nor the B2037 are safe or suitable routes for encouraging cyclists to utilise in order to access Gatwick Green nor routes that are conducive to encouraging people to travel by cycle because:</p> <ul style="list-style-type: none"> • The routes are too narrow for cyclists and motor vehicles to pass safely; and • There is a higher risk of cyclists being involved in a fatal injury on roads such as these than other types of road. <p>6.6 Neither the Transport Study nor the Wilky Transport Study identify how cycle infrastructure will be provided to serve Gatwick Green, neither the form of it nor if it can be delivered having regard to the fact that Balcombe Road is too narrow to accommodate cycle lanes and Gatwick Green is enclosed by third party land which would need to be crossed to deliver cycle routes.</p> <p>6.7 As a consequence, it can be expected that very few, if any, functional journeys would be made by cycle.</p> <p>6.8 Development at Gatwick Green will in itself result in a significant increase in vehicles using the B2036 Balcombe Road. Such an increase in traffic travelling in the road, especially an increase in the HGV component of the traffic, would further discourage people from accessing Gatwick Green by cycle due to the combination of an increased risk of collision and a reduction in amenity arising from an increased volume of traffic as well as an increase in fear and intimidation associated with HGV volumes.</p>

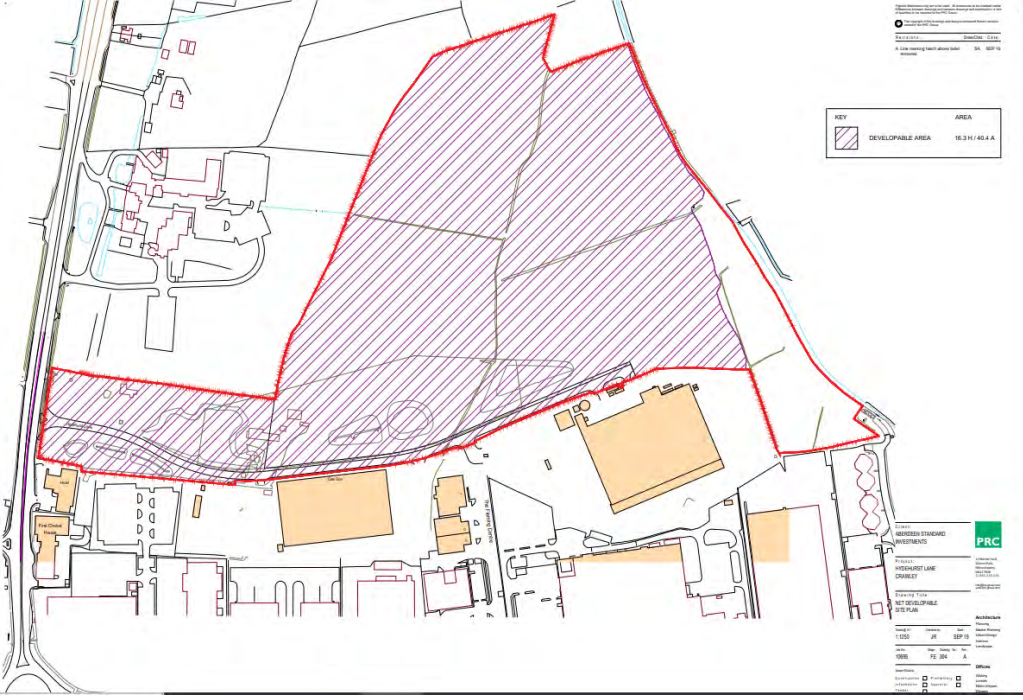
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			<p>6.9 In contrast, the Manor Royal Extension would have direct access to the existing Crawley Cycle Network. Connections to the network could be achieved via land in control of developers at Manor Royal Extension. It can therefore be reasonably expected that journeys would be made to and from the Manor Royal Extension by cycle.</p> <p>Journeys by Bus</p> <p>6.10 There are currently no bus services located within reasonable walking distance of Gatwick Green. In the absence of the provision of new bus services, there is very little prospect of people travelling to and from Gatwick Green by bus. There is no evidence provided in support of the DCLP that a range of bus routes serving a variety of destinations will be delivered to support development at Gatwick Green.</p> <p>6.11 In contrast there is an established range of bus services operating within approximately 10 minutes' walk of the Manor Royal Extension which serve the existing Manor Royal area. These serve a variety of destinations including Crawley, Three Bridges, Redhill, Gatwick Airport, Bewbush and Pound Hill. It can therefore be reasonably expected that journeys would be made to and from the Manor Royal Extension by bus.</p> <p>Journeys by Rail</p> <p>6.12 The nearest accessible railway station to Gatwick Green is Horley railway station to the north. This is located an approximately 2,300m walk from the centre of the Site. Based on the distance between the Site and the nearest railway stations (including if a general right of access for pedestrians along Buckingham Gate can be achieved) it can be expected that very few, if any, connecting journeys would be made by foot.</p> <p>6.13 It is possible, based solely on distance, that people might cycle to the railway station (s). However given the deficiencies set out above with regards to cycling on the access routes to Gatwick Green, the prospect of many (if any) people undertaking such a combined trip is very unlikely. There are no existing bus services.</p> <p>6.14 As a consequence, it can be expected that very few, if any, journeys would be made to and from Gatwick Green by rail.</p> <p>6.15 In contrast, whilst the Manor Royal Extension would be located further than the reasonable walking distance to and from a railway station, it benefits from access to an established cycle network and bus network that facilitate safe and convenient linkages to train services. It can therefore be reasonably expected that journeys would be made to and from the Manor Royal Extension by rail.</p> <p>Highway Access</p> <p>Magnitude of Vehicular Trips</p> <p>6.16 It is not clear from the Transport Study how the peak hour traffic volumes for Gatwick Green have been calculated. A suggested mix of floor areas is put forward in the Transport Study which assume only 10% of floorspace used for parcel distribution. However even if the split of floor space identified in the Transport Study is</p>

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			<p>realistic, it is clear that the Transport Study has significantly under-estimated the volume of traffic that is likely to arise from allocating land at Gatwick Green for a mix of industrial uses.</p> <p>6.17 Due to the wide variety of end users covered by a land use class B8 permission, just a minor tweak in the land use mix can result in a material increase in road traffic. There is no sensitivity test in the Transport Study to determine how resilient the future transport network would be to minor changes in land use mixes, such as these, which would not be controlled or prevented by the DCLP</p> <p>6.18 By incorrectly underestimating the peak hour traffic volumes by nearly 50% combined with failing to undertake any sensitivity tests on likely end users, the Transport Study cannot be relied upon to assess the ability of the local road network to accommodate traffic associated with Policy EC4.</p> <p>Highway Network</p> <p>6.19 Gatwick Green has no direct access route to the SRN. The routes between Gatwick Green and the SRN would result in large volumes of traffic (up to 600 vehicles in a single hour and over 700 HGVs between 07:00-19:00) travelling through Horley town centre and / or residential areas. This will result in detrimental impacts on air quality, noise and resident amenity. Notwithstanding these potentially significant traffic and environmental impacts, the Council's evidence base does not appear to assess the extent of these impacts and hence offer mitigation.</p> <p>6.20 It is understood that an alternative access route to Gatwick Green could be achieved by providing a new junction arrangement at the A2011 Balcombe Road junction and that the Transport Study relies on this being delivered by a 3rd party developer unrelated to proposals for Gatwick Green. It is further understood that this would remove limited moves slip roads and replace these with a system of three signal controlled junctions in close proximity to each other.</p> <p>6.21 Notwithstanding the reliance placed on the delivery of a new junction arrangement at this location, the Council fails to provide even an outline sketch of what this proposal would look like. It is therefore impossible to determine if this junction improvement is either effective, deliverable or safe and suitable for the type of traffic arising from the Gatwick Green proposal.</p> <p>6.22 In contrast, the Manor Royal Extension has direct access routes to the SRN via roads purpose built to carry large volumes of traffic including large volumes of HGV traffic. No new junctions are required. No reliance on 3rd parties is required. Safe and suitable vehicular access routes to development at Manor Royal Extension are available now.</p>

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			<p>Residual Cumulative Impacts Planning Stage Plan for A2011 and Balcombe Road Signal Junction System 6.23 NES Modelling submitted to and agreed by WSCC and Highways England demonstrates that the proposed new A2011 Balcombe Road junction system as permitted, was planned to accommodate traffic arising from the permitted NE Sector development, but only to accommodate traffic from this development. There is very little spare capacity in the permitted junction system to accommodate traffic from other development. Indeed the right turn lane for traffic turning from Balcombe Road to the A2011 link road is unable to even accommodate forecast queues associated with the NE Sector.</p> <p>6.24 As a consequence, traffic arising from Gatwick Green would block back onto the carriageway at these junctions resulting in unacceptable highway safety impacts and severe residual impacts on the road network.</p> <p>6.25 It is accepted that in the face of severe queues and delays at this junction traffic arising from Policy EC4 may choose alternative routes to travel between the development and the SRN. However, the alternative routes would route traffic, including HGV traffic, through town centre and residential areas with the resulting adverse highway capacity, air quality, noise and amenity impacts which simply have not been assessed in the DCLP.</p> <p>Transport Study Modelling 6.26 The Transport Study demonstrates that planned improvements to the A2011 Balcombe Road junction would fail to adequately accommodate traffic growth during the DCLP period even in the absence of development at Gatwick Green.</p> <p>6.27 With the inclusion of traffic arising from the development at Gatwick Green and mitigation measures alluded to in the Transport Study, the Transport Study still predicts that future highway conditions at this junction will severely deteriorate. This is in a scenario in which traffic forecasts for Gatwick Green included in the Transport Study are severely underestimate by several hundred vehicle movements during peak hours. The Transport Study purports to have considered further mitigation at the new A2011 Boscombe Road signal junction and claims that the significant over capacity outcomes identified in the assessment could be overcome through signal optimisation. The Transport Study however fails to present any evidence that this hypothesis is correct. Instead it merely makes the assertion that severe traffic problems at a junction that is already significantly overcapacity in the reference case, before the several hundred vehicle movements associated with Gatwick Green try and fit through it, can be resolved by “tweaking” the signals. This is simply an incredulous proposition and one which should be given no weight.</p> <p>6.28 In reality, the new A2011 Boscombe Road signal junction has been designed to “just about” accommodate traffic arising from the North East Sector permitted development for which it was designed, but not to accommodate traffic arising from Gatwick Green. As a consequence, in the absence of further physical infrastructure interventions to provide the capacity necessary, traffic arising from Policy EC4 would block back</p>

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			<p>onto the carriageway at these junctions resulting in unacceptable highway safety impacts and sever residual impacts on the road network. 6.29 In comparison, the Transport Study identifies that both the Tushmore Roundabout and Hazelwick Roundabout would operate with spare capacity for much of the time in the reference case. These are the two junctions that would be most used by traffic travelling to and from the Manor Royal Extension.</p> <p>Conclusion</p> <p>6.30 For the reasons set out above, it is concluded that development at Gatwick Green:</p> <ul style="list-style-type: none"> • is unsustainable in transportation terms thereby failing to meet the requirements of paragraphs 105 and 110 (a) of the NPPF; • does not demonstrate that safe and suitable access (including access routes) can be achieved for all users thereby failing to meet the requirements of paragraph 110 (b) of the NPPF; • Relies on significant new infrastructure interventions that have neither been quantified nor demonstrated to be cost effectively deliverable thereby failing to meet the requirements of paragraph 110 (c) of the NPPF; • would result in an unacceptable impact on highway safety thereby meeting the test at paragraph 111 of the NPPF against which development should be prevented or refused; and • would result in severe residual cumulative impacts on the road network thereby meeting the test at paragraph 111 of the NPPF against which development should be prevented or refused. <p>6.31 As a consequence, we do not consider that the level of floorspace identified at Gatwick Green is deliverable. It should therefore be removed from the DCLP because it is undeliverable in terms of highways and transportation.</p> <p>6.32 In contrast, the Manor Royal Extension would benefit from:</p> <ul style="list-style-type: none"> • an established sustainable travel network thereby meeting the requirements of NPPF paragraphs 105 and 110; and • highway access routes with spare capacity to adequately accommodate traffic growth during the DCLP period thereby meeting the requirements of NPPF paragraph 110 (c). 6.33 There is every prospect therefore that cost effective highway mitigation could be identified safely and suitably to accommodate additional traffic and travel demand arising from the Manor Royal Extension. Accordingly it should be considered for inclusion in the DCLP as a sustainable site suitable for accommodating new employment development.

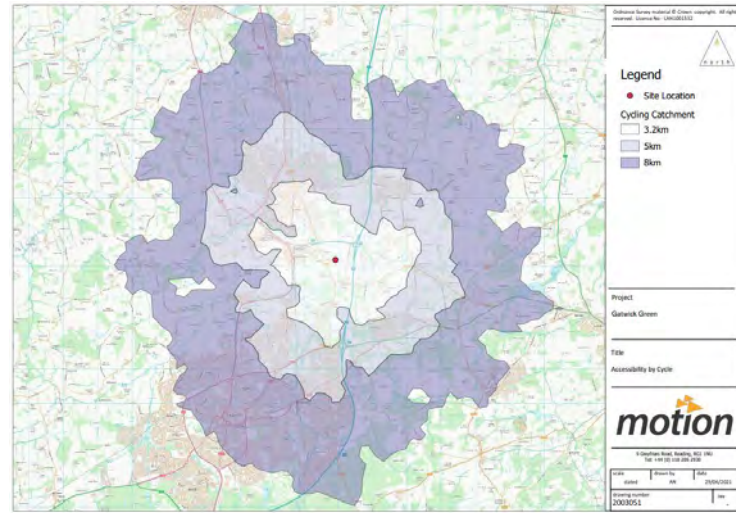
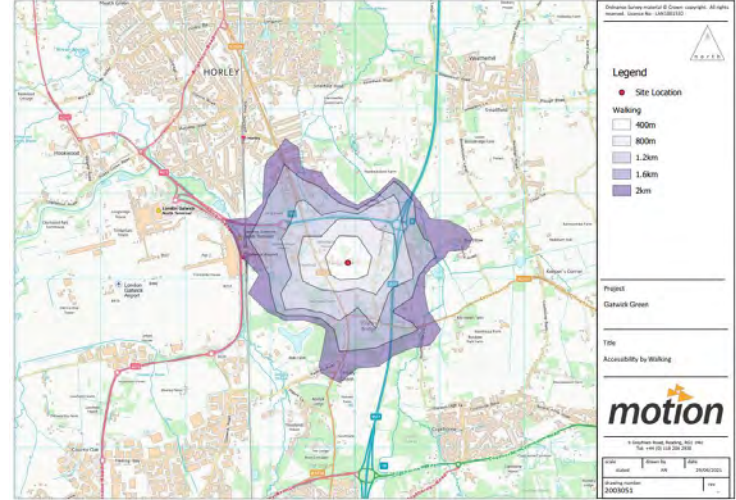
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			<p>Appendix A: Manor Royal Extension</p>  <p>The map displays a site plan with a large area hatched in pink, indicating the 'DEVELOPABLE AREA'. A legend in the top right corner specifies 'DEVELOPABLE AREA 16.3 H/ 62.4 A'. The map includes various buildings, roads, and infrastructure. A key in the top right corner identifies the hatched area. A legend in the bottom right corner provides details on 'INVESTMENTS', 'PROPOSED LANE CHANGES', and 'NET DEVELOPABLE AREA'. A PRC logo is also present in the bottom right corner.</p>

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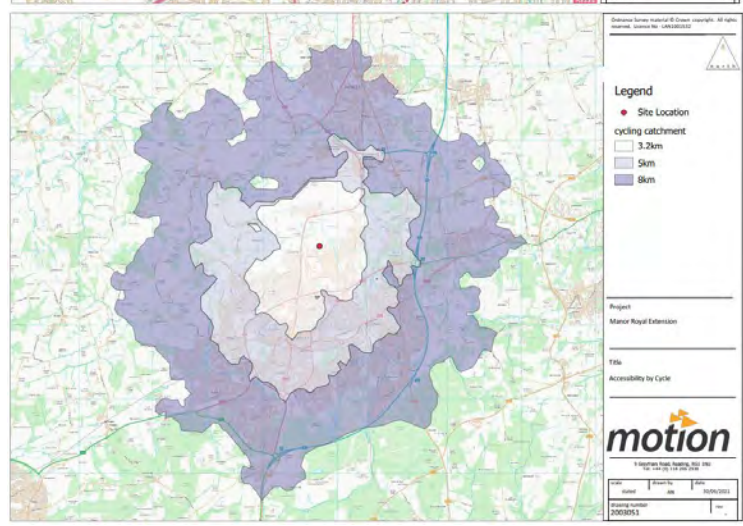
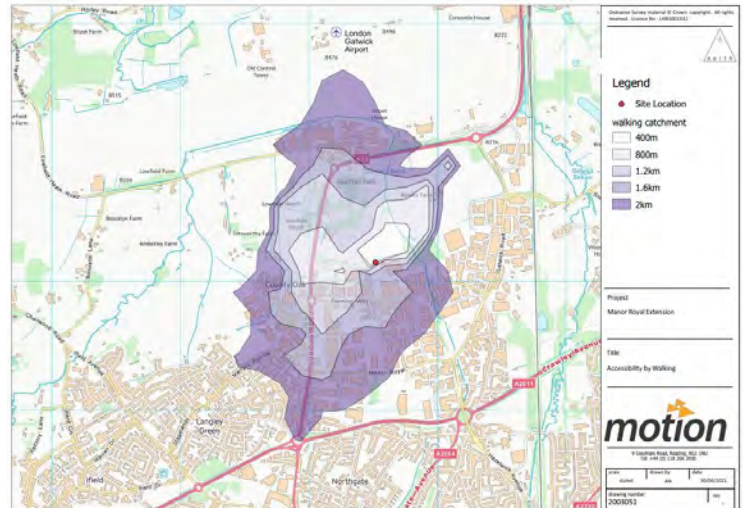
Appendix B: Walk and Cycle Catchments – Gatwick Green



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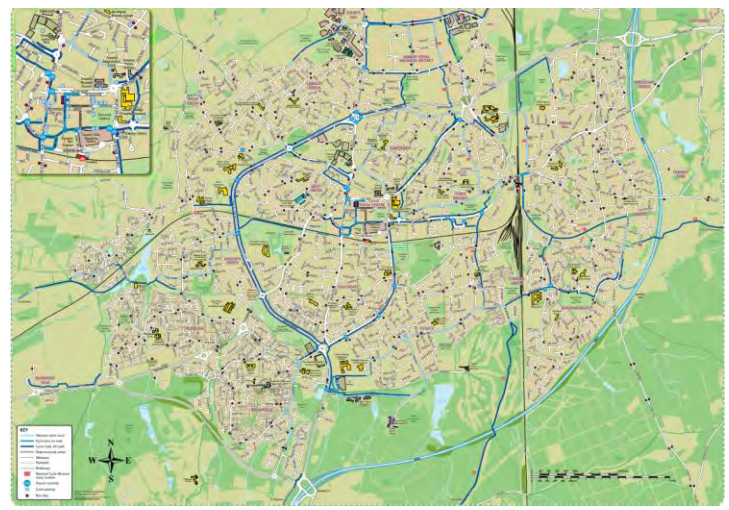
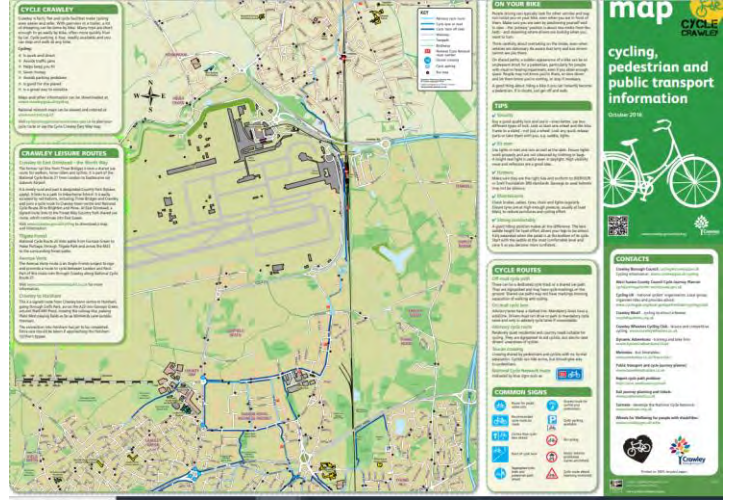
Appendix C Walk Catchments – Manor Royal Extension



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Appendix D Crawley Cycle Network Map



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			<p>Appendix E TRICs Reports</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>TRICS 7.10.1 040523 B21.34 Database right of TRICS Consortium Limited, 2023. All rights reserved Wednesday 07/06/23 Page 11 <small>Notion High Street Guildford Licence No: 734001</small></p> <p>TRIP RATE CALCULATION SELECTION PARAMETERS: Calculation Reference: AUDIT-734001-230607-0629</p> <p>Land Use - 02 - EMPLOYMENT Category - 0 - PARCEL DISTRIBUTION CENTRES</p> <p>TOTAL VEHICLES</p> <p><u>Select region and areas:</u> 02 SOUTH EAST SO - SLOUGH 1 days 05 EAST MIDLANDS LN - LINCOLNSHIRE 1 days</p> <p><i>This section displays the number of survey days per TRICS® sub-region in the selected set.</i></p> <p>Primary Filtering selection: <i>This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.</i></p> <p>Parameter: Gross floor area Actual Range: 1496 to 15583 (units: sqm) Range Selected by User: 763 to 24154 (units: sqm) Parking Spaces Range: All Surveys Included</p> <p><u>Public Transport Provision:</u> Selection by: Include all surveys.</p> <p>Date Range: 01/01/15 to 11/05/21 <i>This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.</i></p> <p><u>Selected survey days:</u> Tuesday 1 days Friday 1 days <i>This data displays the number of selected surveys by day of the week.</i></p> <p><u>Selected survey types:</u> Manual count 2 days Directional ATC Count 0 days <i>This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.</i></p> <p><u>Selected Locations:</u> Edge of Town -3 <i>This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not known.</i></p> <p><u>Selected Location Sub Categories:</u> Industrial Zone 1 Development Zone 1 <i>This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.</i></p> <p><u>Inclusion of Servicing Vehicles Counts:</u> Servicing vehicles Included 2 days - Selected Servicing vehicles Excluded 1 days - Selected</p> </div> <div style="width: 48%;"> <p>TRICS 7.10.1 040523 B21.34 Database right of TRICS Consortium Limited, 2023. All rights reserved Wednesday 07/06/23 Page 11 <small>Notion High Street Guildford Licence No: 734001</small></p> <p>Secondary Filtering selection:</p> <p><u>Use Cities:</u> BB 2 days <i>This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.</i></p> <p><u>Filter by Site Operations Breakdown:</u> All Surveys Included</p> <p><u>Population within 500m Range:</u> All Surveys Included <u>Population within 1 mile:</u> 1,001 to 5,000 1 days 10,001 to 15,000 1 days <i>This data displays the number of selected surveys within stated 1-mile radii of population.</i></p> <p><u>Population within 5 miles:</u> 125,001 to 250,000 1 days 250,001 to 500,000 1 days <i>This data displays the number of selected surveys within stated 5-mile radii of population.</i></p> <p><u>Car ownership within 5 miles:</u> 1.1 to 1.5 2 days <i>This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.</i></p> <p><u>Travel Plan:</u> Yes 1 days No 1 days <i>This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.</i></p> <p><u>PTAL Rating:</u> No PTAL Present 2 days <i>This data displays the number of selected surveys with PTAL Ratings.</i></p> <p><u>Covid-19 Restrictions</u> Yes At least one survey within the selected data set was undertaken at a time of Covid-19 restrictions</p> </div> </div>

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LIST OF SITES relevant to selection parameters

- 1 LN-02-G-01 PARCELFORCE WORLDWIDE LINCOLNSHIRE**
 WHISBY WAY
 LINCOLN
 BIRCHWOOD
 Edge of Town
 Industrial Zone
 Total Gross floor area: 1496 sqm
 Survey date: FRIDAY 28/06/19 Survey Type: MANUAL
- 2 SO-02-G-02 DHL SLOUGH**
 HORTON ROAD
 SLOUGH
 COLNBROOK
 Edge of Town
 Development Zone
 Total Gross floor area: 15583 sqm
 Survey date: TUESDAY 11/05/21 Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

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TRIP RATE for Land Use 02 - EMPLOYMENT/G - PARCEL DISTRIBUTION CENTRES
TOTAL VEHICLES
 Calculation factor: **100 sqm**
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00	1	15583	0.039	1	15583	0.032	1	15583	0.071
01:00 - 02:00	1	15583	0.096	1	15583	0.071	1	15583	0.167
02:00 - 03:00	1	15583	0.141	1	15583	0.135	1	15583	0.276
03:00 - 04:00	1	15583	0.205	1	15583	0.193	1	15583	0.398
04:00 - 05:00	1	15583	0.308	1	15583	0.225	1	15583	0.533
05:00 - 06:00	2	8540	0.609	2	8540	0.187	2	8540	0.796
06:00 - 07:00	2	8540	0.667	2	8540	0.375	2	8540	1.042
07:00 - 08:00	2	8540	0.492	2	8540	0.925	2	8540	1.417
08:00 - 09:00	2	8540	0.504	2	8540	0.369	2	8540	0.873
09:00 - 10:00	2	8540	0.351	2	8540	0.263	2	8540	0.614
10:00 - 11:00	2	8540	0.252	2	8540	0.316	2	8540	0.568
11:00 - 12:00	2	8540	0.217	2	8540	0.328	2	8540	0.545
12:00 - 13:00	2	8540	0.340	2	8540	0.310	2	8540	0.650
13:00 - 14:00	2	8540	0.445	2	8540	0.404	2	8540	0.849
14:00 - 15:00	2	8540	0.281	2	8540	0.316	2	8540	0.597
15:00 - 16:00	2	8540	0.351	2	8540	0.492	2	8540	0.843
16:00 - 17:00	2	8540	0.568	2	8540	0.492	2	8540	1.060
17:00 - 18:00	2	8540	0.404	2	8540	0.708	2	8540	1.112
18:00 - 19:00	2	8540	0.404	2	8540	0.422	2	8540	0.826
19:00 - 20:00	2	8540	0.580	2	8540	0.422	2	8540	1.002
20:00 - 21:00	2	8540	0.281	2	8540	0.222	2	8540	0.503
21:00 - 22:00	1	15583	0.218	1	15583	0.520	1	15583	0.738
22:00 - 23:00	1	15583	0.340	1	15583	0.314	1	15583	0.654
23:00 - 24:00	1	15583	0.116	1	15583	0.160	1	15583	0.276
Total Rates:			8.209			8.201			16.410

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

Chapter 9. Economic Growth

Ref. No.	Respondent	Policy/ Para	Comments
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Parameter summary

Trip rate parameter range selected: 1496 - 15583 (units: sqm)
 Survey date date range: 01/01/15 - 11/05/21
 Number of weekdays (Monday-Friday): 2
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 1
 Surveys manually removed from selection: 0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

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TRIP RATE for Land Use 02 - EMPLOYMENT/G - PARCEL DISTRIBUTION CENTRES

OGVS

Calculation factor: 100 sqm
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00	1	15583	0.032	1	15583	0.032	1	15583	0.064
01:00 - 02:00	1	15583	0.019	1	15583	0.019	1	15583	0.038
02:00 - 03:00	1	15583	0.064	1	15583	0.083	1	15583	0.147
03:00 - 04:00	1	15583	0.116	1	15583	0.103	1	15583	0.219
04:00 - 05:00	1	15583	0.109	1	15583	0.122	1	15583	0.231
05:00 - 06:00	2	8540	0.193	2	8540	0.111	2	8540	0.304
06:00 - 07:00	2	8540	0.129	2	8540	0.111	2	8540	0.240
07:00 - 08:00	2	8540	0.094	2	8540	0.258	2	8540	0.352
08:00 - 09:00	2	8540	0.111	2	8540	0.076	2	8540	0.187
09:00 - 10:00	2	8540	0.111	2	8540	0.076	2	8540	0.187
10:00 - 11:00	2	8540	0.123	2	8540	0.152	2	8540	0.275
11:00 - 12:00	2	8540	0.053	2	8540	0.053	2	8540	0.106
12:00 - 13:00	2	8540	0.088	2	8540	0.070	2	8540	0.158
13:00 - 14:00	2	8540	0.053	2	8540	0.053	2	8540	0.106
14:00 - 15:00	2	8540	0.064	2	8540	0.105	2	8540	0.169
15:00 - 16:00	2	8540	0.076	2	8540	0.064	2	8540	0.140
16:00 - 17:00	2	8540	0.111	2	8540	0.146	2	8540	0.257
17:00 - 18:00	2	8540	0.041	2	8540	0.094	2	8540	0.135
18:00 - 19:00	2	8540	0.082	2	8540	0.100	2	8540	0.182
19:00 - 20:00	2	8540	0.059	2	8540	0.123	2	8540	0.182
20:00 - 21:00	2	8540	0.105	2	8540	0.047	2	8540	0.152
21:00 - 22:00	1	15583	0.090	1	15583	0.122	1	15583	0.212
22:00 - 23:00	1	15583	0.212	1	15583	0.083	1	15583	0.295
23:00 - 24:00	1	15583	0.083	1	15583	0.051	1	15583	0.134
Total Rates:			2.218			2.254			4.472

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

Chapter 9. Economic Growth

Ref. No.	Respondent	Policy/ Para	Comments																																																												
			<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>TRICS 7.10.1 040523 B21.34 Database right of TRICS Consortium Limited, 2023. All rights reserved Wednesday 07/06/23 Page 1 Motion High Street Guildford Licence No: 734001</p> <p>Calculation Reference: AUDIT-734001-230607-0642</p> <p>TRIP RATE CALCULATION SELECTION PARAMETERS:</p> <p>Land Use : 02 - EMPLOYMENT Category : E - WAREHOUSING (SELF STORAGE)</p> <p>TOTAL VEHICLES</p> <p><u>Selected regions and areas:</u></p> <table border="0"> <tr> <td>04 EAST ANGLIA</td> <td></td> </tr> <tr> <td>SF SUFFOLK</td> <td>1 days</td> </tr> <tr> <td>07 YORKSHIRE & NORTH LINCOLNSHIRE</td> <td>1 days</td> </tr> <tr> <td>NW NORTH YORKSHIRE</td> <td>1 days</td> </tr> <tr> <td>09 NORTH</td> <td>1 days</td> </tr> <tr> <td>CB CUMBRIA</td> <td>1 days</td> </tr> </table> <p><i>This section displays the number of survey days per TRICS® sub-region in the selected set.</i></p> <p>Primary Filtering selection:</p> <p><i>This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.</i></p> <p>Parameter: Gross floor area Actual Range: 1350 to 3100 (units: sqm) Range Selected by User: 1350 to 14000 (units: sqm)</p> <p>Parking Spaces Range: All Surveys Included</p> <p><u>Public Transport Provision:</u> Selection by: Include all surveys</p> <p>Date Range: 01/01/15 to 15/10/21</p> <p><i>This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.</i></p> <p><u>Selected survey days:</u></p> <table border="0"> <tr> <td>Tuesday</td> <td>1 days</td> </tr> <tr> <td>Thursday</td> <td>1 days</td> </tr> <tr> <td>Friday</td> <td>1 days</td> </tr> </table> <p><i>This data displays the number of selected surveys by day of the week.</i></p> <p><u>Selected survey types:</u></p> <table border="0"> <tr> <td>Manual count</td> <td>3 days</td> </tr> <tr> <td>Directional ATC Count</td> <td>0 days</td> </tr> </table> <p><i>This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.</i></p> <p><u>Selected Locations:</u></p> <table border="0"> <tr> <td>Edge of Town</td> <td>3</td> </tr> </table> <p><i>This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.</i></p> <p><u>Selected Location Sub Categories:</u></p> <table border="0"> <tr> <td>Industrial Zone</td> <td>3</td> </tr> </table> <p><i>This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.</i></p> <p><u>Inclusion of Servicing Vehicles Counts:</u></p> <table border="0"> <tr> <td>Servicing vehicles Included</td> <td>X days - Selected</td> </tr> <tr> <td>Servicing vehicles Excluded</td> <td>3 days - Selected</td> </tr> </table> </div> <div style="width: 48%;"> <p>TRICS 7.10.1 040523 B21.34 Database right of TRICS Consortium Limited, 2023. All rights reserved Wednesday 07/06/23 Page 2 Motion High Street Guildford Licence No: 734001</p> <p>Secondary Filtering selection:</p> <p><u>Use Class:</u></p> <table border="0"> <tr> <td>B8</td> <td>3 days</td> </tr> </table> <p><i>This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.</i></p> <p><u>Filter by Site Operations Breakdown:</u></p> <table border="0"> <tr> <td>All Surveys Included</td> <td></td> </tr> </table> <p><u>Population within 500m Range:</u></p> <table border="0"> <tr> <td>All Surveys Included</td> <td></td> </tr> <tr> <td><u>Population within 1 mile:</u></td> <td></td> </tr> <tr> <td>5,001 to 10,000</td> <td>1 days</td> </tr> <tr> <td>10,001 to 15,000</td> <td>1 days</td> </tr> <tr> <td>15,001 to 20,000</td> <td>1 days</td> </tr> </table> <p><i>This data displays the number of selected surveys within stated 1-mile radii of population.</i></p> <p><u>Population within 5 miles:</u></p> <table border="0"> <tr> <td>5,001 to 25,000</td> <td>1 days</td> </tr> <tr> <td>75,001 to 100,000</td> <td>1 days</td> </tr> <tr> <td>125,001 to 250,000</td> <td>1 days</td> </tr> </table> <p><i>This data displays the number of selected surveys within stated 5-mile radii of population.</i></p> <p><u>Car ownership within 5 miles:</u></p> <table border="0"> <tr> <td>0.6 to 1.0</td> <td>1 days</td> </tr> <tr> <td>1.1 to 1.5</td> <td>1 days</td> </tr> <tr> <td>1.6 to 2.0</td> <td>1 days</td> </tr> </table> <p><i>This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.</i></p> <p><u>Travel Plan:</u></p> <table border="0"> <tr> <td>No</td> <td>3 days</td> </tr> </table> <p><i>This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.</i></p> <p><u>PTAL Rating:</u></p> <table border="0"> <tr> <td>No PTAL Present</td> <td>3 days</td> </tr> </table> <p><i>This data displays the number of selected surveys with PTAL Ratings.</i></p> <p>Covid-19 Restrictions Yes At least one survey within the selected data set was undertaken at a time of Covid-19 restrictions</p> </div> </div>	04 EAST ANGLIA		SF SUFFOLK	1 days	07 YORKSHIRE & NORTH LINCOLNSHIRE	1 days	NW NORTH YORKSHIRE	1 days	09 NORTH	1 days	CB CUMBRIA	1 days	Tuesday	1 days	Thursday	1 days	Friday	1 days	Manual count	3 days	Directional ATC Count	0 days	Edge of Town	3	Industrial Zone	3	Servicing vehicles Included	X days - Selected	Servicing vehicles Excluded	3 days - Selected	B8	3 days	All Surveys Included		All Surveys Included		<u>Population within 1 mile:</u>		5,001 to 10,000	1 days	10,001 to 15,000	1 days	15,001 to 20,000	1 days	5,001 to 25,000	1 days	75,001 to 100,000	1 days	125,001 to 250,000	1 days	0.6 to 1.0	1 days	1.1 to 1.5	1 days	1.6 to 2.0	1 days	No	3 days	No PTAL Present	3 days
04 EAST ANGLIA																																																															
SF SUFFOLK	1 days																																																														
07 YORKSHIRE & NORTH LINCOLNSHIRE	1 days																																																														
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5,001 to 10,000	1 days																																																														
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75,001 to 100,000	1 days																																																														
125,001 to 250,000	1 days																																																														
0.6 to 1.0	1 days																																																														
1.1 to 1.5	1 days																																																														
1.6 to 2.0	1 days																																																														
No	3 days																																																														
No PTAL Present	3 days																																																														

Chapter 9. Economic Growth

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LIST OF SITES relevant to selection parameters

1	CB-02-E-01	BOX CLEVER SELF STORAGE	CUMBRIA
MILLBROOK ROAD CARLISLE KINGSTOWN IND. ESTATE Edge of Town Industrial Zone Total Gross floor area: 3100 sqm Survey date: FRIDAY 15/10/21 Survey Type: MANUAL			
2	NY-02-E-01	SELF STORAGE	NORTH YORKSHIRE
OAKNEY WOOD ROAD SELBY Edge of Town Industrial Zone Total Gross floor area: 1350 sqm Survey date: TUESDAY 21/09/21 Survey Type: MANUAL			
3	SF-02-E-01	SELF STORAGE	SUFFOLK
WHITE HOUSE ROAD IPSWICH Edge of Town Industrial Zone Total Gross floor area: 1530 sqm Survey date: THURSDAY 24/06/21 Survey Type: MANUAL			

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

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TRIP RATE for Land Use 02 - EMPLOYMENT/E - WAREHOUSING (SELF STORAGE)
TOTAL VEHICLES
 Calculation factor: 100 sqm
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00	3	1993	0.050	3	1993	0.050	3	1993	0.100
07:00 - 08:00	3	1993	0.084	3	1993	0.067	3	1993	0.151
08:00 - 10:00	3	1993	0.217	3	1993	0.134	3	1993	0.351
10:00 - 11:00	3	1993	0.151	3	1993	0.234	3	1993	0.385
11:00 - 12:00	3	1993	0.134	3	1993	0.134	3	1993	0.268
12:00 - 13:00	3	1993	0.201	3	1993	0.151	3	1993	0.352
13:00 - 14:00	3	1993	0.100	3	1993	0.067	3	1993	0.167
14:00 - 15:00	3	1993	0.251	3	1993	0.251	3	1993	0.502
15:00 - 16:00	3	1993	0.134	3	1993	0.201	3	1993	0.335
16:00 - 17:00	3	1993	0.117	3	1993	0.066	3	1993	0.201
17:00 - 18:00	3	1993	0.050	3	1993	0.117	3	1993	0.167
18:00 - 19:00	3	1993	0.067	3	1993	0.050	3	1993	0.117
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			1.556			1.540			3.096

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the columns) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRIP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as 'ACT'). So, the method is: COUNT/(TRIP*ACT). Trip rates are then rounded to 3 decimal places.*

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The Company accepts no responsibility for loss which may arise from reliance on data contained in the TRICS Database. [No warranty of any kind, express or implied, is made as to the data contained in the TRICS Database.]

Parameter summary

Trip rate parameter range selected: 1350 - 3100 (units: sqm)
 Survey date date range: 01/01/15 - 15/10/21
 Number of weekdays (Monday-Friday): 3
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 0
 Surveys manually removed from selection: 0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

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TRIP RATE for Land Use 02 - EMPLOYMENT/E - WAREHOUSING (SELF STORAGE)

OGVS
Calculation factor: 100 sqm
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	1993	0.000	3	1993	0.000	3	1993	0.000
08:00 - 09:00	3	1993	0.017	3	1993	0.017	3	1993	0.034
09:00 - 10:00	3	1993	0.000	3	1993	0.017	3	1993	0.017
10:00 - 11:00	3	1993	0.017	3	1993	0.017	3	1993	0.034
11:00 - 12:00	3	1993	0.000	3	1993	0.000	3	1993	0.000
12:00 - 13:00	3	1993	0.000	3	1993	0.000	3	1993	0.000
13:00 - 14:00	3	1993	0.017	3	1993	0.017	3	1993	0.034
14:00 - 15:00	3	1993	0.000	3	1993	0.000	3	1993	0.000
15:00 - 16:00	3	1993	0.000	3	1993	0.000	3	1993	0.000
16:00 - 17:00	3	1993	0.000	3	1993	0.000	3	1993	0.000
17:00 - 18:00	3	1993	0.000	3	1993	0.000	3	1993	0.000
18:00 - 19:00	3	1993	0.017	3	1993	0.000	3	1993	0.017
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.068			0.068			0.136

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

Chapter 9. Economic Growth

Ref. No.	Respondent	Policy/ Para	Comments																																																																																						
			<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>TRICS 7.10.1 040523 B21.34 Database right of TRICS Consortium Limited, 2023. All rights reserved Wednesday 07/06/23 Page 1</p> <p>Motion High Street Guildford Licence No: 734001</p> <p>TRIP RATE CALCULATION SELECTION PARAMETERS:</p> <p>Land Use : 02 - EMPLOYMENT Category : F - WAREHOUSING (COMMERCIAL) TOTAL VEHICLES</p> <p><u>Selected regions and areas:</u></p> <table border="0"> <tr><td>02 SOUTH EAST</td><td>1 days</td></tr> <tr><td>BD BEDFORD</td><td>1 days</td></tr> <tr><td>EX ESSEX</td><td>1 days</td></tr> <tr><td>HC HAMPSHIRE</td><td>1 days</td></tr> <tr><td>HW MEDWAY</td><td>1 days</td></tr> <tr><td>03 SOUTH WEST</td><td>1 days</td></tr> <tr><td>DV DEVON</td><td>1 days</td></tr> <tr><td>TS TORQUAY</td><td>1 days</td></tr> <tr><td>04 EAST ANGLIA</td><td>1 days</td></tr> <tr><td>SF SUFFOLK</td><td>1 days</td></tr> <tr><td>06 WEST MIDLANDS</td><td>1 days</td></tr> <tr><td>WM WEST MIDLANDS</td><td>1 days</td></tr> <tr><td>07 YORKSHIRE & NORTH LINCOLNSHIRE</td><td>1 days</td></tr> <tr><td>WY WEST YORKSHIRE</td><td>1 days</td></tr> <tr><td>09 NORTH</td><td>1 days</td></tr> <tr><td>TW TYNE & WEAR</td><td>1 days</td></tr> </table> <p><i>This section displays the number of survey days per TRICS® sub-region in the selected set</i></p> <p>Primary Filtering selection:</p> <p><i>This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.</i></p> <p>Parameter: Gross floor area Actual Range: 190 to 49681 (units: sqm) Range Selected by User: 190 to 80100 (units: sqm)</p> <p>Parking Spaces Range: All Surveys Included</p> <p><u>Public Transport Provision:</u> Selection by: Include all surveys</p> <p>Date Range: 01/01/15 to 22/11/21</p> <p><i>This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.</i></p> <p><u>Selected survey days:</u></p> <table border="0"> <tr><td>Monday</td><td>3 days</td></tr> <tr><td>Thursday</td><td>2 days</td></tr> <tr><td>Friday</td><td>5 days</td></tr> </table> <p><i>This data displays the number of selected surveys by day of the week.</i></p> <p><u>Selected survey types:</u></p> <table border="0"> <tr><td>Manual count</td><td>10 days</td></tr> <tr><td>Directional ATC Count</td><td>0 days</td></tr> </table> <p><i>This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.</i></p> <p><u>Selected Locations:</u></p> <table border="0"> <tr><td>Edge of Town</td><td>9</td></tr> <tr><td>Free Standing (PPS6 Out of Town)</td><td>1</td></tr> </table> <p><i>This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not known.</i></p> <p><u>Selected Location Sub Categories:</u></p> <table border="0"> <tr><td>Industrial Zone</td><td>8</td></tr> <tr><td>Commercial Zone</td><td>1</td></tr> <tr><td>Out of Town</td><td>1</td></tr> </table> <p><i>This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.</i></p> </div> <div style="width: 48%;"> <p>TRICS 7.10.1 040523 B21.34 Database right of TRICS Consortium Limited, 2023. All rights reserved Wednesday 07/06/23 Page 2</p> <p>Motion High Street Guildford Licence No: 734001</p> <p>Secondary Filtering selection:</p> <p><u>Use Class:</u></p> <table border="0"> <tr><td>n/a</td><td>2 days</td></tr> <tr><td>B8</td><td>8 days</td></tr> </table> <p><i>This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.</i></p> <p><u>Filter by Site Operations Breakdown:</u> All Surveys Included</p> <p><u>Population within 500m Range:</u> All Surveys Included</p> <p><u>Population within 1 mile:</u></p> <table border="0"> <tr><td>1,001 to 5,000</td><td>2 days</td></tr> <tr><td>5,001 to 10,000</td><td>3 days</td></tr> <tr><td>10,001 to 15,000</td><td>2 days</td></tr> <tr><td>15,001 to 20,000</td><td>2 days</td></tr> <tr><td>25,001 to 50,000</td><td>1 days</td></tr> </table> <p><i>This data displays the number of selected surveys within stated 1-mile radii of population.</i></p> <p><u>Population within 5 miles:</u></p> <table border="0"> <tr><td>5,001 to 25,000</td><td>1 days</td></tr> <tr><td>100,001 to 125,000</td><td>1 days</td></tr> <tr><td>125,001 to 250,000</td><td>5 days</td></tr> <tr><td>250,001 to 500,000</td><td>2 days</td></tr> <tr><td>500,001 or More</td><td>1 days</td></tr> </table> <p><i>This data displays the number of selected surveys within stated 5-mile radii of population.</i></p> <p><u>Car ownership within 5 miles:</u></p> <table border="0"> <tr><td>0.6 to 1.0</td><td>3 days</td></tr> <tr><td>1.1 to 1.5</td><td>7 days</td></tr> </table> <p><i>This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.</i></p> <p><u>Travel Plan:</u></p> <table border="0"> <tr><td>No</td><td>10 days</td></tr> </table> <p><i>This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.</i></p> <p><u>PTAL Rating:</u></p> <table border="0"> <tr><td>No PTAL Present</td><td>10 days</td></tr> </table> <p><i>This data displays the number of selected surveys with PTAL Ratings.</i></p> <p><u>Covid-19 Restrictions</u></p> <table border="0"> <tr><td>Yes</td><td>At least one survey within the selected data set was undertaken at a time of Covid-19 restrictions</td></tr> </table> </div> </div>	02 SOUTH EAST	1 days	BD BEDFORD	1 days	EX ESSEX	1 days	HC HAMPSHIRE	1 days	HW MEDWAY	1 days	03 SOUTH WEST	1 days	DV DEVON	1 days	TS TORQUAY	1 days	04 EAST ANGLIA	1 days	SF SUFFOLK	1 days	06 WEST MIDLANDS	1 days	WM WEST MIDLANDS	1 days	07 YORKSHIRE & NORTH LINCOLNSHIRE	1 days	WY WEST YORKSHIRE	1 days	09 NORTH	1 days	TW TYNE & WEAR	1 days	Monday	3 days	Thursday	2 days	Friday	5 days	Manual count	10 days	Directional ATC Count	0 days	Edge of Town	9	Free Standing (PPS6 Out of Town)	1	Industrial Zone	8	Commercial Zone	1	Out of Town	1	n/a	2 days	B8	8 days	1,001 to 5,000	2 days	5,001 to 10,000	3 days	10,001 to 15,000	2 days	15,001 to 20,000	2 days	25,001 to 50,000	1 days	5,001 to 25,000	1 days	100,001 to 125,000	1 days	125,001 to 250,000	5 days	250,001 to 500,000	2 days	500,001 or More	1 days	0.6 to 1.0	3 days	1.1 to 1.5	7 days	No	10 days	No PTAL Present	10 days	Yes	At least one survey within the selected data set was undertaken at a time of Covid-19 restrictions
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Chapter 9. Economic Growth

Ref. No.	Respondent	Policy/ Para	Comments
			<p>TRICS 7.10.1 040523 B21.34 Database right of TRICS Consortium Limited, 2023. All rights reserved Wednesday 07/06/23 <small>Motion High Street Guildford Licence No: 734001 Page 3</small></p> <p><i>LIST OF SITES relevant to selection parameters</i></p> <p>1 80-02-F-01 DRINKS WHOLESALER BEDFORD CAMBRIDGE ROAD BEDFORD Edge of Town Industrial Zone Total Gross floor area: 3000 sqm Survey date: THURSDAY 15/10/20 Survey Type: MANUAL</p> <p>2 0V-02-F-02 LIDL DISTRIBUTION CENTRE DEVON CHILPARR BRAKE NEAR EXETER CLYST HADNTON Free Standing (PP56 Out of Town) Out of Town Total Gross floor area: 49081 sqm Survey date: MONDAY 22/11/21 Survey Type: MANUAL</p> <p>3 EX-02-F-01 SPORTS SUPPLEMENTS ESSEX BRUNEL WAY COLCHESTER SEVERALS INDUSTRIAL PK Edge of Town Industrial Zone Total Gross floor area: 6560 sqm Survey date: FRIDAY 18/05/18 Survey Type: MANUAL</p> <p>4 HC-02-F-03 PPE DISTRIBUTION HAMPSHIRE WARSASH ROAD FANK GATE Edge of Town Industrial Zone Total Gross floor area: 3665 sqm Survey date: MONDAY 22/09/21 Survey Type: MANUAL</p> <p>5 MW-02-F-02 COMMERCIAL WAREHOUSING MEDWAY HILLS ROAD AVLESFORD QUARRY WOOD Edge of Town Industrial Zone Total Gross floor area: 11200 sqm Survey date: FRIDAY 22/09/17 Survey Type: MANUAL</p> <p>6 SP-02-F-03 ROAD HAULAGE SUFFOLK CENTRAL AVENUE IPSWICH WARREN HEATH Edge of Town Industrial Zone Total Gross floor area: 4700 sqm Survey date: FRIDAY 18/09/15 Survey Type: MANUAL</p> <p>7 TB-02-F-01 OPTICS WAREHOUSE TORBAY ALDERS WAY PAIGINTON Edge of Town Industrial Zone Total Gross floor area: 190 sqm Survey date: FRIDAY 29/02/19 Survey Type: MANUAL</p> <p>8 TW-02-F-01 ASDA DISTRIBUTION CENTRE TYNE & WEAR WASHINGTON PATTISON IND. ESTATE Edge of Town Industrial Zone Total Gross floor area: 31000 sqm Survey date: FRIDAY 13/11/15 Survey Type: MANUAL</p>
			<p>TRICS 7.10.1 040523 B21.34 Database right of TRICS Consortium Limited, 2023. All rights reserved Wednesday 07/06/23 <small>Motion High Street Guildford Licence No: 734001 Page 4</small></p> <p><i>LIST OF SITES relevant to selection parameters (Cont.)</i></p> <p>9 WM-02-F-02 LOGISTICS FIRM WEST MIDLANDS SOVEREIGN ROAD BIRMINGHAM KINGS NORTON Edge of Town Commercial Zone Total Gross floor area: 3625 sqm Survey date: MONDAY 09/11/15 Survey Type: MANUAL</p> <p>10 WY-02-F-02 DISTRIBUTION COMPANY WEST YORKSHIRE STAITHGATE LANE BRADFORD NEWHALL Edge of Town Industrial Zone Total Gross floor area: 10446 sqm Survey date: THURSDAY 14/03/19 Survey Type: MANUAL</p> <p><i>This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.</i></p>

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Ref. No.	Respondent	Policy/ Para	Comments
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 Motion High Street Guildford Licence No: 734001

TRIP RATE for Land Use 02 - EMPLOYMENT/F - WAREHOUSING (COMMERCIAL)
TOTAL VEHICLES
 Calculation factor: 100 sqm
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00	4	15804	0.176	4	15804	0.054	4	15804	0.230
06:00 - 07:00	4	15804	0.166	4	15804	0.082	4	15804	0.248
07:00 - 08:00	10	12397	0.156	10	12397	0.087	10	12397	0.243
08:00 - 09:00	10	12397	0.177	10	12397	0.099	10	12397	0.276
09:00 - 10:00	10	12397	0.129	10	12397	0.080	10	12397	0.209
10:00 - 11:00	10	12397	0.107	10	12397	0.096	10	12397	0.203
11:00 - 12:00	10	12397	0.100	10	12397	0.102	10	12397	0.202
12:00 - 13:00	10	12397	0.111	10	12397	0.111	10	12397	0.222
13:00 - 14:00	10	12397	0.119	10	12397	0.124	10	12397	0.243
14:00 - 15:00	10	12397	0.094	10	12397	0.152	10	12397	0.246
15:00 - 16:00	10	12397	0.085	10	12397	0.136	10	12397	0.221
16:00 - 17:00	10	12397	0.075	10	12397	0.135	10	12397	0.210
17:00 - 18:00	10	12397	0.078	10	12397	0.161	10	12397	0.239
18:00 - 19:00	10	12397	0.035	10	12397	0.093	10	12397	0.128
19:00 - 20:00	4	15804	0.035	4	15804	0.063	4	15804	0.098
20:00 - 21:00	4	15804	0.044	4	15804	0.038	4	15804	0.082
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			1.687			1.613			3.300

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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 Motion High Street Guildford Licence No: 734001

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The Company accepts no responsibility for loss which may arise from reliance on data contained in the TRICS Database. [No warranty of any kind, express or implied, is made as to the data contained in the TRICS Database.]

Parameter summary

Trip rate parameter range selected: 190 - 49081 (units: sqm)
 Survey date date range: 01/01/15 - 22/11/21
 Number of weekdays (Monday-Friday): 10
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 0
 Surveys manually removed from selection: 0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Chapter 9. Economic Growth

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TRIP RATE for Land Use 02 - EMPLOYMENT/F - WAREHOUSING (COMMERCIAL)
OGVS
 Calculation factor: **100 sqm**
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00	4	15804	0.032	4	15804	0.028	4	15804	0.060
06:00 - 07:00	4	15804	0.047	4	15804	0.046	4	15804	0.093
07:00 - 08:00	10	12397	0.041	10	12397	0.056	10	12397	0.097
08:00 - 09:00	10	12397	0.044	10	12397	0.052	10	12397	0.096
09:00 - 10:00	10	12397	0.052	10	12397	0.040	10	12397	0.092
10:00 - 11:00	10	12397	0.052	10	12397	0.050	10	12397	0.102
11:00 - 12:00	10	12397	0.040	10	12397	0.044	10	12397	0.084
12:00 - 13:00	10	12397	0.043	10	12397	0.040	10	12397	0.083
13:00 - 14:00	10	12397	0.032	10	12397	0.044	10	12397	0.076
14:00 - 15:00	10	12397	0.030	10	12397	0.032	10	12397	0.062
15:00 - 16:00	10	12397	0.038	10	12397	0.028	10	12397	0.066
16:00 - 17:00	10	12397	0.039	10	12397	0.034	10	12397	0.073
17:00 - 18:00	10	12397	0.048	10	12397	0.031	10	12397	0.079
18:00 - 19:00	10	12397	0.042	10	12397	0.018	10	12397	0.040
19:00 - 20:00	4	15804	0.013	4	15804	0.016	4	15804	0.029
20:00 - 21:00	4	15804	0.013	4	15804	0.011	4	15804	0.024
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.586			0.570			1.156

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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 Motion High Street Guildford Licence No: 734001 **Page 1**

Calculation Reference: AUDIT-734001-230607-0632

TRIP RATE CALCULATION SELECTION PARAMETERS:
 Land Use : 02 - EMPLOYMENT
 Category : D - INDUSTRIAL ESTATE

TOTAL VEHICLES

Selected regions and areas:

02 SOUTH EAST		
EX ESSEX		3 days
03 SOUTH WEST		
DV DEVON		1 days
NS NORTH SOMERSET		1 days
SM SOMERSET		1 days
04 EAST ANGLIA		
NF NORFOLK		1 days
05 EAST MIDLANDS		
LN LINCOLNSHIRE		1 days
NM WEST NORTHAMPTONSHIRE		1 days
06 WEST MIDLANDS		
WK WARWICKSHIRE		4 days
WO WORCESTERSHIRE		2 days
07 YORKSHIRE & NORTH LINCOLNSHIRE		
NY NORTH YORKSHIRE		1 days
WY WEST YORKSHIRE		5 days
08 NORTH WEST		
LC LANCASHIRE		2 days
09 NORTH		
TW TYNE & WEAR		2 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:
This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Gross floor area
 Actual Range: 1776 to 150564 (units: sqm)
 Range Selected by User: 708 to 167416 (units: sqm)

Parking Spaces Range: All Surveys Included

Public Transport Provision: Selection by: Include all surveys

Date Range: 01/01/15 to 18/11/22

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	4 days
Tuesday	3 days
Wednesday	8 days
Thursday	5 days
Friday	5 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	25 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Edge of Town	24
Free Standing (PPS6 Out of Town)	1

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Chapter 9. Economic Growth

Ref. No.	Respondent	Policy/ Para	Comments		
			<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>TRICS 7.10.1 040523 B21.34 – Database right of TRICS Consortium Limited, 2023. All rights reserved Wednesday 07/06/23 Page 2 Licence No: 734001</p> <p>Motion High Street Guildford</p> <p><i>This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.</i></p> <p><u>Inclusion of Servicing Vehicles Counts:</u> Servicing vehicles Included 8 days - Selected Servicing vehicles Excluded 18 days - Selected</p> <p>Secondary Filtering selection:</p> <p><u>Use Class:</u> n/a 1 days Not Known 24 days</p> <p><i>This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.</i></p> <p><u>Filter by Site Operations Breakdown:</u> All Surveys Included</p> <p><u>Population within 500m Range:</u> All Surveys Included <u>Population within 1 mile:</u> 1,000 or Less 1 days 1,001 to 5,000 1 days 5,001 to 10,000 5 days 10,001 to 15,000 8 days 15,001 to 20,000 5 days 20,001 to 25,000 2 days 25,001 to 50,000 3 days</p> <p><i>This data displays the number of selected surveys within stated 1-mile radii of population.</i></p> <p><u>Population within 5 miles:</u> 5,001 to 25,000 1 days 25,001 to 50,000 2 days 50,001 to 75,000 2 days 75,001 to 100,000 3 days 100,001 to 125,000 1 days 125,001 to 250,000 13 days 250,001 to 500,000 3 days</p> <p><i>This data displays the number of selected surveys within stated 5-mile radii of population.</i></p> <p><u>Car ownership within 5 miles:</u> 0.6 to 1.0 12 days 1.1 to 1.5 12 days 1.6 to 2.0 1 days</p> <p><i>This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.</i></p> <p><u>Travel Plans:</u> No 25 days</p> <p><i>This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.</i></p> <p><u>PTAL Rating:</u> No PTAL Present 25 days</p> <p><i>This data displays the number of selected surveys with PTAL Ratings.</i></p> <p>Covid-19 Restrictions Yes At least one survey within the selected data set was undertaken at a time of Covid-19 restrictions</p> </div> <div style="width: 48%;"> <p>TRICS 7.10.1 040523 B21.34 – Database right of TRICS Consortium Limited, 2023. All rights reserved Wednesday 07/06/23 Page 3 Licence No: 734001</p> <p>Motion High Street Guildford</p> <p><u>LIST OF SITES relevant to selection parameters</u></p> <table border="0"> <tr> <td style="vertical-align: top;"> <p>1 DV-02-D-07 INDUSTRIAL ESTATE DEVON</p> <p>BITTERN ROAD EXETER SOWTON IND. ESTATE Edge of Town Industrial Zone Total Gross floor area: 3600 sqm Survey date: MONDAY 03/07/17</p> <p>2 EX-02-D-03 INDUSTRIAL ESTATE ESSEX</p> <p>WYNCOLLS ROAD COLCHESTER SEVERALLS INDUSTRIAL PK Edge of Town Industrial Zone Total Gross floor area: 4876 sqm Survey date: FRIDAY 18/05/18</p> <p>3 EX-02-D-04 INDUSTRIAL ESTATE ESSEX</p> <p>PASTURE ROAD WITHAM Edge of Town Industrial Zone Total Gross floor area: 37130 sqm Survey date: THURSDAY 10/05/18</p> <p>4 EX-02-D-05 INDUSTRIAL ESTATE ESSEX</p> <p>HECKWORTH CLOSE COLCHESTER SEVERALLS INDUSTRIAL PK Edge of Town Industrial Zone Total Gross floor area: 7280 sqm Survey date: FRIDAY 18/05/18</p> <p>5 LC-02-D-07 INDUSTRIAL ESTATE LANCASHIRE</p> <p>CHAIN CAUL WAY PRESTON ASHTON-ON-RIBBLE Edge of Town Industrial Zone Total Gross floor area: 4700 sqm Survey date: FRIDAY 17/11/17</p> <p>6 LC-02-D-08 INDUSTRIAL ESTATE LANCASHIRE</p> <p>NOOK LANE BAMBER BRIDGE Edge of Town Industrial Zone Total Gross floor area: 4000 sqm Survey date: TUESDAY 06/11/18</p> <p>7 LN-02-D-03 INDUSTRIAL ESTATE LINCOLNSHIRE</p> <p>DEACON ROAD LINCOLN Edge of Town Industrial Zone Total Gross floor area: 11265 sqm Survey date: FRIDAY 28/06/19</p> </td> <td style="vertical-align: top; padding-left: 20px;"> <p>Survey Type: MANUAL</p> <p>Survey Type: MANUAL</p> <p>Survey Type: MANUAL</p> <p>Survey Type: MANUAL</p> <p>Survey Type: MANUAL</p> <p>Survey Type: MANUAL</p> <p>Survey Type: MANUAL</p> </td> </tr> </table> </div> </div>	<p>1 DV-02-D-07 INDUSTRIAL ESTATE DEVON</p> <p>BITTERN ROAD EXETER SOWTON IND. 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<p>1 DV-02-D-07 INDUSTRIAL ESTATE DEVON</p> <p>BITTERN ROAD EXETER SOWTON IND. ESTATE Edge of Town Industrial Zone Total Gross floor area: 3600 sqm Survey date: MONDAY 03/07/17</p> <p>2 EX-02-D-03 INDUSTRIAL ESTATE ESSEX</p> <p>WYNCOLLS ROAD COLCHESTER SEVERALLS INDUSTRIAL PK Edge of Town Industrial Zone Total Gross floor area: 4876 sqm Survey date: FRIDAY 18/05/18</p> <p>3 EX-02-D-04 INDUSTRIAL ESTATE ESSEX</p> <p>PASTURE ROAD WITHAM Edge of Town Industrial Zone Total Gross floor area: 37130 sqm Survey date: THURSDAY 10/05/18</p> <p>4 EX-02-D-05 INDUSTRIAL ESTATE ESSEX</p> <p>HECKWORTH CLOSE COLCHESTER SEVERALLS INDUSTRIAL PK Edge of Town Industrial Zone Total Gross floor area: 7280 sqm Survey date: FRIDAY 18/05/18</p> <p>5 LC-02-D-07 INDUSTRIAL ESTATE LANCASHIRE</p> <p>CHAIN CAUL WAY PRESTON ASHTON-ON-RIBBLE Edge of Town Industrial Zone Total Gross floor area: 4700 sqm Survey date: FRIDAY 17/11/17</p> <p>6 LC-02-D-08 INDUSTRIAL ESTATE LANCASHIRE</p> <p>NOOK LANE BAMBER BRIDGE Edge of Town Industrial Zone Total Gross floor area: 4000 sqm Survey date: TUESDAY 06/11/18</p> <p>7 LN-02-D-03 INDUSTRIAL ESTATE LINCOLNSHIRE</p> <p>DEACON ROAD LINCOLN Edge of Town Industrial Zone Total Gross floor area: 11265 sqm Survey date: FRIDAY 28/06/19</p>	<p>Survey Type: MANUAL</p> <p>Survey Type: MANUAL</p> <p>Survey Type: MANUAL</p> <p>Survey Type: MANUAL</p> <p>Survey Type: MANUAL</p> <p>Survey Type: MANUAL</p> <p>Survey Type: MANUAL</p>				

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			<p>TRICS 7.10.1 040523 B21.34 Database right of TRICS Consortium Limited, 2023. All rights reserved Wednesday 07/06/23 Page 4 Motion High Street Guildford Licence No: 734001</p> <p><i>LIST OF SITES relevant to selection parameters (Cont.)</i></p> <p>8 NF-02-D-04 INDUSTRIAL ESTATE NORFOLK DRAYTON HIGH ROAD NORWICH Edge of Town No Sub Category Total Gross floor area: 10673 sqm Survey date: WEDNESDAY 14/09/22 Survey Type: MANUAL</p> <p>9 NM-02-D-01 INDUSTRIAL ESTATE WEST NORTHAMPTONSHIRE CORNHILL CLOSE NORTHAMPTON LODGE FARM IND. ESTATE Edge of Town Industrial Zone Total Gross floor area: 12670 sqm Survey date: WEDNESDAY 21/10/20 Survey Type: MANUAL</p> <p>10 NS-02-D-01 INDUSTRIAL ESTATE NORTH SOMERSET WINTERSTOKE ROAD WESTON-SUPER-MARE OLDHIXON Edge of Town Industrial Zone Total Gross floor area: 27000 sqm Survey date: THURSDAY 15/09/22 Survey Type: MANUAL</p> <p>11 NY-02-D-03 INDUSTRIAL ESTATE NORTH YORKSHIRE RACECOURSE ROAD RICHMOND Edge of Town Out of Town Total Gross floor area: 35183 sqm Survey date: THURSDAY 05/05/22 Survey Type: MANUAL</p> <p>12 SM-02-D-01 INDUSTRIAL ESTATE SOMERSET A359 YEOVIL SPARKFORD Free Standing (PPSG Out of Town) Out of Town Total Gross floor area: 12000 sqm Survey date: WEDNESDAY 03/04/19 Survey Type: MANUAL</p> <p>13 TW-02-D-09 INDUSTRIAL ESTATE TYNE & WEAR ELEVENTH AVENUE GATESHEAD TEAM VALLEY Edge of Town No Sub Category Total Gross floor area: 6300 sqm Survey date: WEDNESDAY 18/05/22 Survey Type: MANUAL</p> <p>14 TW-02-D-10 INDUSTRIAL ESTATE TYNE & WEAR ELEVENTH AVENUE GATESHEAD TEAM VALLEY Edge of Town No Sub Category Total Gross floor area: 21500 sqm Survey date: WEDNESDAY 18/05/22 Survey Type: MANUAL</p>
			<p>TRICS 7.10.1 040523 B21.34 Database right of TRICS Consortium Limited, 2023. All rights reserved Wednesday 07/06/23 Page 5 Motion High Street Guildford Licence No: 734001</p> <p><i>LIST OF SITES relevant to selection parameters (Cont.)</i></p> <p>15 WK-02-D-01 INDUSTRIAL ESTATE WARWICKSHIRE CASTLE MOUND WAY RUGBY Edge of Town Industrial Zone Total Gross floor area: 150564 sqm Survey date: WEDNESDAY 27/06/18 Survey Type: MANUAL</p> <p>16 WK-02-D-02 INDUSTRIAL ESTATE WARWICKSHIRE OVERVIEW WAY RUGBY Edge of Town Industrial Zone Total Gross floor area: 90535 sqm Survey date: WEDNESDAY 27/06/18 Survey Type: MANUAL</p> <p>17 WK-02-D-03 INDUSTRIAL ESTATE WARWICKSHIRE EASTBORD WAY NUNEATON Edge of Town Industrial Zone Total Gross floor area: 20860 sqm Survey date: THURSDAY 26/09/19 Survey Type: MANUAL</p> <p>18 WK-02-D-04 INDUSTRIAL ESTATE WARWICKSHIRE ABELES WAY ATHERSTONE Edge of Town No Sub Category Total Gross floor area: 17500 sqm Survey date: FRIDAY 27/09/19 Survey Type: MANUAL</p> <p>19 WO-02-D-02 INDUSTRIAL ESTATE WORCESTERSHIRE WEIR LANE WORCESTER Edge of Town Residential Zone Total Gross floor area: 9500 sqm Survey date: MONDAY 14/11/16 Survey Type: MANUAL</p> <p>20 WO-02-D-03 INDUSTRIAL ESTATE WORCESTERSHIRE MILLENNIUM WAY EVESHAM Edge of Town Out of Town Total Gross floor area: 84575 sqm Survey date: TUESDAY 26/06/18 Survey Type: MANUAL</p> <p>21 WY-02-D-04 INDUSTRIAL ESTATE WEST YORKSHIRE LAW STREET CLECKHEATON Edge of Town Industrial Zone Total Gross floor area: 23226 sqm Survey date: THURSDAY 15/09/16 Survey Type: MANUAL</p> <p>22 WY-02-D-05 INDUSTRIAL ESTATE WEST YORKSHIRE CARR WOOD ROAD CASTLEFORD Edge of Town Development Zone Total Gross floor area: 1776 sqm Survey date: MONDAY 22/05/17 Survey Type: MANUAL</p>

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LIST OF SITES relevant to selection parameters (Cont.)

23 WY-02-D-06 INDUSTRIAL ESTATE (PART) WEST YORKSHIRE
 PIONEER WAY
 CASTLEFORD
 Edge of Town
 Industrial Zone
 Total Gross floor area: 4328 sqm
 Survey date: TUESDAY 23/05/17 Survey Type: MANUAL

24 WY-02-D-07 INDUSTRIAL ESTATE WEST YORKSHIRE
 THUNDERHEAD RIDGE RD
 CASTLEFORD
 GLASSHOUGHTON
 Edge of Town
 No Sub Category
 Total Gross floor area: 3191 sqm
 Survey date: MONDAY 15/05/17 Survey Type: MANUAL

25 WY-02-D-08 INDUSTRIAL ESTATE WEST YORKSHIRE
 MILL LANE
 HALIFAX
 Edge of Town
 No Sub Category
 Total Gross floor area: 11305 sqm
 Survey date: WEDNESDAY 17/10/18 Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

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TRIP RATE for Land Use 02 - EMPLOYMENT/D - INDUSTRIAL ESTATE
TOTAL VEHICLES
 Calculation factor: 100 sqm
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00	8	18948	0.065	8	18948	0.022	8	18948	0.087
06:00 - 07:00	9	18095	0.126	9	18095	0.049	9	18095	0.175
07:00 - 08:00	25	24617	0.304	25	24617	0.086	25	24617	0.390
08:00 - 09:00	25	24617	0.398	25	24617	0.155	25	24617	0.553
09:00 - 10:00	25	24617	0.299	25	24617	0.198	25	24617	0.497
10:00 - 11:00	25	24617	0.247	25	24617	0.207	25	24617	0.454
11:00 - 12:00	25	24617	0.243	25	24617	0.233	25	24617	0.476
12:00 - 13:00	25	24617	0.245	25	24617	0.285	25	24617	0.531
13:00 - 14:00	25	24617	0.284	25	24617	0.264	25	24617	0.548
14:00 - 15:00	25	24617	0.214	25	24617	0.286	25	24617	0.500
15:00 - 16:00	25	24617	0.186	25	24617	0.255	25	24617	0.441
16:00 - 17:00	25	24617	0.191	25	24617	0.326	25	24617	0.517
17:00 - 18:00	25	24617	0.121	25	24617	0.367	25	24617	0.488
18:00 - 19:00	25	24617	0.081	25	24617	0.153	25	24617	0.234
19:00 - 20:00	9	18095	0.084	9	18095	0.101	9	18095	0.185
20:00 - 21:00	9	18095	0.028	9	18095	0.047	9	18095	0.075
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			3.117			3.094			6.151

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

Chapter 9. Economic Growth

Ref. No.	Respondent	Policy/ Para	Comments
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Parameter summary

Trip rate parameter range selected: 1776 - 150564 (units: sqm)
 Survey date date range: 01/01/15 - 18/11/22
 Number of weekdays (Monday-Friday): 25
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 1
 Surveys manually removed from selection: 0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

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 Motion High Street Guildford Licence No: 734001

TRIP RATE for Land Use 02 - EMPLOYMENT/D - INDUSTRIAL ESTATE

OGVS
Calculation factor: 100 sqm
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00	8	18948	0.005	8	18948	0.005	8	18948	0.010
06:00 - 07:00	9	18095	0.006	9	18095	0.011	9	18095	0.017
07:00 - 08:00	25	24617	0.016	25	24617	0.012	25	24617	0.028
08:00 - 09:00	25	24617	0.026	25	24617	0.020	25	24617	0.046
09:00 - 10:00	25	24617	0.033	25	24617	0.026	25	24617	0.059
10:00 - 11:00	25	24617	0.028	25	24617	0.026	25	24617	0.054
11:00 - 12:00	25	24617	0.027	25	24617	0.026	25	24617	0.053
12:00 - 13:00	25	24617	0.028	25	24617	0.027	25	24617	0.055
13:00 - 14:00	25	24617	0.025	25	24617	0.027	25	24617	0.052
14:00 - 15:00	25	24617	0.026	25	24617	0.025	25	24617	0.051
15:00 - 16:00	25	24617	0.023	25	24617	0.026	25	24617	0.049
16:00 - 17:00	25	24617	0.017	25	24617	0.020	25	24617	0.037
17:00 - 18:00	25	24617	0.013	25	24617	0.011	25	24617	0.024
18:00 - 19:00	25	24617	0.009	25	24617	0.011	25	24617	0.020
19:00 - 20:00	9	18095	0.003	9	18095	0.003	9	18095	0.006
20:00 - 21:00	9	18095	0.002	9	18095	0.001	9	18095	0.003
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.287			0.277			0.564

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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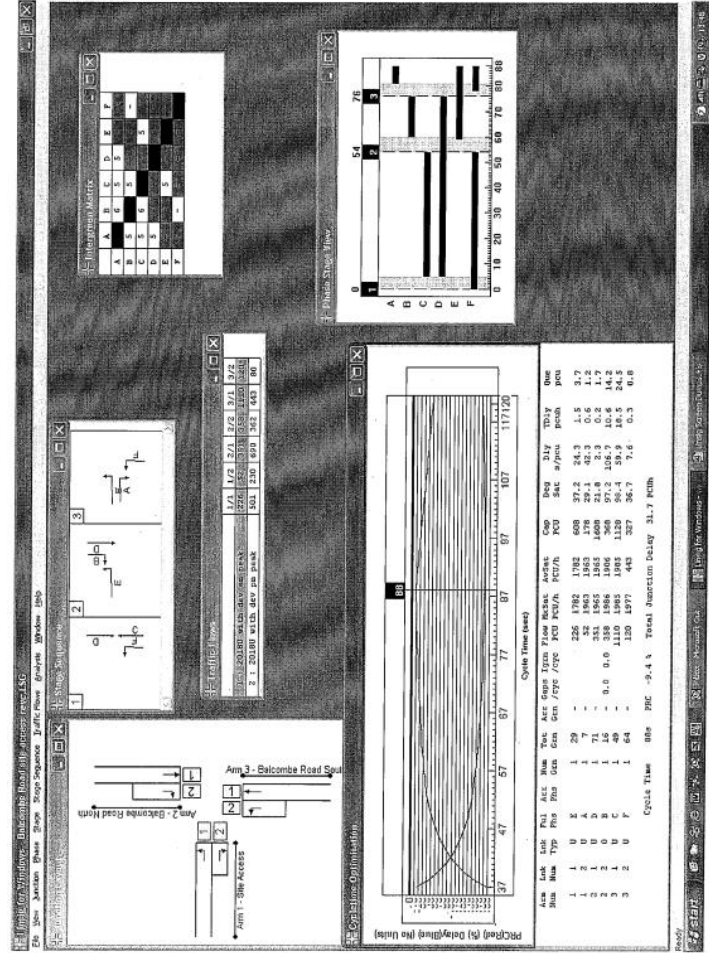
Comments

Appendix F North East Sector Modelling
 Appendix 26 Balcombe Road (South) Site Access - Junction Assessments

Balcombe Road (S) Site Access

Assessment Year 2018 with Development

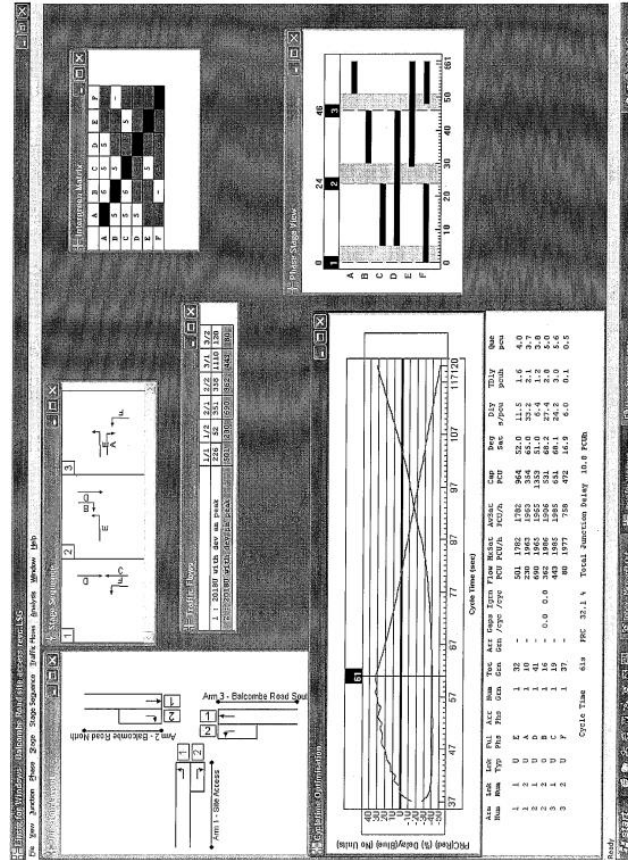
Link	AM Peak		PM Peak	
	Deg. Sat	Q	Deg Sat	Q
1/1	37.2	3.7	52	4
1/2	29.1	1.2	65	3.7
2/1	21.8	1.7	51	3.8
2/2	97.2	14.2	68.2	5
3/1	98.4	24.5	68.1	5.6
3/2	36.7	0.8	16.9	0.5



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Comments



Appendix 25 Crawley Avenue Site Access - Junction Assessments

Crawley Avenue Site Access

Assessment Year 2018 with Development

Link	AM Peak		PM Peak	
	Deg. Sat	Q	Deg Sat	Q
1/1	44.3	2.2	88	7.4
1/2	86.5	24	45.5	10.6
2/1	17	1.6	50.8	5
2/2	48	15.6	95.4	36.9
3/1	29.5	3.7	23.5	2.7
3/2	85.1	15.9	91.9	16.9

Crawley Avenue (Link Road) Site Access

Assessment Year 2018 with Development

Link	AM Peak		PM Peak	
	Deg. Sat	Q	Deg Sat	Q
1/1	32.1	3.3	63.2	6.4
1/2	5.1	0.3	14	0.9
2/1	36.1	2.7	54.6	2.4
2/2	10.7	0.3	7.7	0.3
3/1	5.4	0.2	12.4	0.5
3/2	36.7	3.6	25.8	1.9

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			<p>representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. The representation relates to Strategic Policy EC4 Strategic Employment Location in the Draft Crawley Borough Local Plan, 2023 (DCBLP).</p> <p>1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The plan at Appendix 1 shows the extent of GGL's and the proposed allocation of Gatwick Green. The land has been promoted by TWG/GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation is divided into seven further sections: Section 2.0 – sets out the underlying case for Gatwick Green with reference to the absence of any basis for safeguarding for a second runway, and the economic case for the allocation in Strategic Policy EC4. Section 3.0 – provides a summary of the representation, setting out the element of Strategic Policy EC4 to which GGL is objecting, the basis of that objection in terms of soundness and what changes are being sought to policy to address the objection. Section 4.0 – sets out the need for changes to Strategic Policy EC4 to ensure it is consistent with the soundness tests in NPPF. Section 5.0 – provides a high-level evaluation to demonstrate that Gatwick Green can be developed in accordance with the development management requirements in Strategic Policy EC4. Section 6.0 – supports the Council's SA/SEA in relation to Strategic Policy EC4. Section 7.0 – sets out the basis for GGL's objections based on the evidence, why Strategic Policy EC4 and paragraph 9.58 are not considered to be sound, and what changes are required to make the policy and text sound.</p> <p>2.0 The case for Gatwick Green</p> <p>2.1 This Statement is submitted on behalf of Gatwick Green Limited (GGL) on the Draft Crawley Borough Local Plan, 2023 (DCBLP / the Plan).</p> <p>2.2 The key to enabling the implementation of Strategic Policy EC4, which responds to the identified need for strategic Industrial and Logistics (I&L) land in Strategic Policy EC1, is the release of Gatwick Green from safeguarding for the provision of a southern wide-spaced runway at London Gatwick Airport (LGW).</p> <p>2.3 Draft Policy GAT2 and Topic Paper 2 set out the robust case for the release of the land from safeguarding, which is supported by GGL. However, there are a number of points to highlight:</p>

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			<ul style="list-style-type: none"> • Whilst the principle of safeguarding is Government policy, the boundary and extent of the safeguarded land is a matter for the Local Planning Authority, following the provision of 'robust' justification by the Airport. • The land currently safeguarded extends to around 523 ha (1,292 acres), which is 80% of the size of Gibraltar or over 2.5 times the size of the Principality of Monaco. Land within the LGW safeguarded area has been blighted for nearly 20 years. • The area, subject to minor changes, has been in place since 2007 when safeguarding was initially identified for the provision of a southern wide-spaced runway at LGW after 2019. As a result, strategic land supply within Crawley Borough Council's (CBC) boundaries has been severely constrained, to the detriment of the growth of the local economy, creating an over-reliance on LGW to provide employment and growth. • In 2015, The Davies Commission selected Heathrow as the South East airport to benefit from a new runway and this was confirmed by a Supreme Court decision in 2020. Since that time, Gatwick Airport Limited (GAL) has repeatedly stated that it is no longer actively pursuing proposals for a wide-spaced runway. • GAL has, instead, consulted in respect of a DCO proposal to bring the existing emergency runway into more regular use and is expected to submit the DCO in July. • The DCO proposals are expected to increase passenger numbers to 80 million passenger pa by 2047. This represents the same passenger throughput as Heathrow prior to the Covid-19 Pandemic. The estimated passenger numbers for the wide-spaced runway proposals were 95 million passengers pa. • In Regulation 19 Submissions from June 2021, GAL opposed the release of the GGL land from the current safeguarding. Whilst it would be unreasonable to expect GAL to provide a detailed Masterplan for the wide-spaced runway, it is not unreasonable to expect GAL to comply with Government Policy and provide a robust justification for the retention of safeguarding over land that is not required for the physical runway or surface access infrastructure. <p>2.4 It is also worth noting that:</p> <ul style="list-style-type: none"> ▪ In July 2021, and as part of the DCO consultation documents, GAL published an Uncertainty Log which provides their own assessment that Gatwick Green is 'More than Likely' to take place. ▪ GAL launched its Airport Economic Zone report (AEZ report)¹² in November 2022, taking the lead from other Airports across the world (and in the UK), which have successfully created strategic employment sites adjacent to a major transport hub. The AEZ report failed to identify any sites around Gatwick to support the initiative – as there are none which do not conflict with safeguarded land. However, as set

¹² Airport Economic Zone, Gatwick Airport Ltd, July 2022

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			<p>out in Savills Strategic Logistics Report¹³ on the locational drivers for industrial and logistics development, proximity to an airport is a key driver in such development.</p> <ul style="list-style-type: none"> ▪ The area of the proposed allocation of Gatwick Green is less than 8.5% of the total area currently safeguarded. ▪ The release of Gatwick Green from safeguarding does not compromise GAL's ability to provide car parking in more land efficient / innovative arrangements or access to those car park areas, as shown in the plan at Appendix B to Appendix 2 of this representation. <p>2.5 CBC has a very clear vision to be a modern, vibrant and sustainable town with strong and diverse communities and sustainable economic growth to make a place that people enjoy and want to live, work and visit. The Vision sets out a forward thinking and ambitious prospectus for Crawley over the next 17 years. The key elements for the CBC economy are to:</p> <ul style="list-style-type: none"> • Strive to be the premier town between London and the South Coast providing jobs and learning opportunities • Be an economic leader with a diverse, resilient and productive economy that meets local needs and supports the prosperity of the region. • Have an environment that supports and encourages new and established businesses to grow and flourish, supported by the necessary infrastructure to enable businesses to flourish. • Be the first choice of business location for domestic and international markets. • Enable the community to benefit from access to high value and sustainable economic growth through thriving innovation, entrepreneurship and advanced technologies. • Create additional jobs across a diverse range of sectors, supported by learning and development opportunities. • Identify land for a new industrial-led Strategic Employment Location to reinforce the status of Crawley as the place to do business in the South East. <p>2.6 The allocation of Gatwick Green is a fundamental component to the delivery of all of these key objectives by offering the opportunity to grow the local economy whilst providing greater resilience by increased business and employment diversification.</p> <p>2.7 Gatwick Green is located at a key strategic position. The Savills Logistics Report highlights that strategic I&L uses are driven by five key factors, all of which apply to Gatwick Green: – access from a motorway; high accessibility to suppliers and customers; high accessibility to a large labour supply; linkages with major freight handling facilities, and proximity to London. Gatwick Green has all these characteristics, including its close proximity to Gatwick Airport, the UK's second largest airport with a growing business in freight handling.</p>

¹³ Strategic Logistics – Location and Complementarity, Savills, June 2023 – Appendix 4 to GGL's representation on Strategic Policy EC1

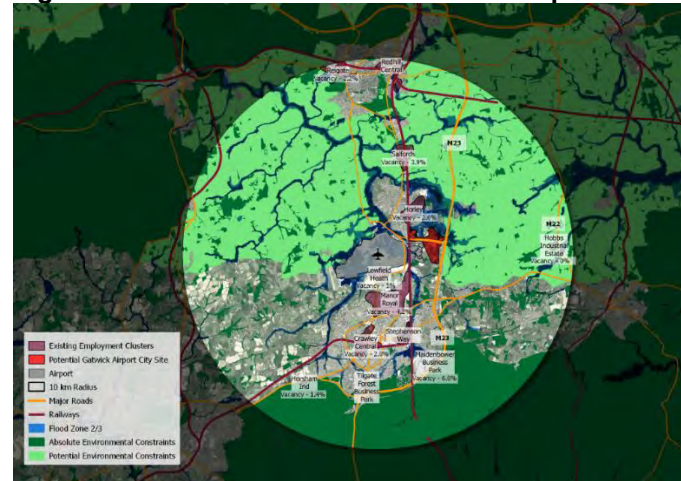
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The co-location of airports and strategic I&L uses is seen at many other UK airports and internationally. Gatwick Green ticks all the boxes as the best location in the region, that can leverage many catalytic economic and productivity advantages for the wider area.

2.8 **Figure 1** shows the constraints in a 10km area around Gatwick Airport, and the existing employment areas most of which have very limited potential to expand. GAL has implied in its AEZ report that a wider area such as this could accommodate I&L growth – but the plan shows very clearly that Gatwick Green is the only site in the 10km area that could deliver any I&L growth at scale and in such a prime location. The same can be said for the Council’s wider FEMA. It is clear, therefore, that if an AEZ were to be adopted, the I&L market would demand that this is closely aligned to LGW. The combination of the Gatwick Green Campus and the office led Horley Business Park (HBP) could support the objectives of the LGW Airport Economic Zone.

Figure 1 – Constraints to economic development 10km from Gatwick Airport

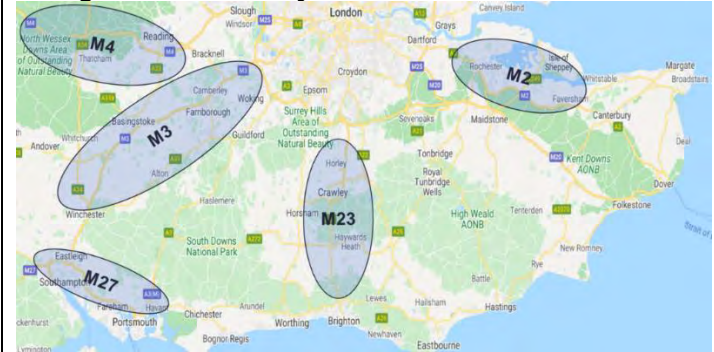


2.9 In addition, **Figure 2** demonstrates the current location of I&L clusters around the motorways linked to the southern half of the M25. The M27, M4, M3 and M2/M20 motorway corridors have a number of large logistics and industrial campuses. Whilst there is I&L provision along the M23/A23 corridor, there is no large scale campus or cluster of campuses. This reinforces the limited provision for I&L development along the M23/A23 corridor which the allocation of Gatwick Green can provide.

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Figure 2 – Motorway corridors in the South East



- 2.10 Initial feasibility work indicates that Gatwick Green could deliver at least 77,800 sqm of floorspace within an overall allocation of 44 ha. As evidenced in GGL's representation on Strategic Policy EC1, the development of the Gatwick Green Campus will provide the following economic and social value benefits:
 - Over 2,500 jobs – onsite and offsite
 - Over 630 construction jobs
 - £79m GVA per annum with an additional £30m created during the construction phase
 - £4.3m business rate income per annum
- 2.11 Appendix 2 to the representation on Strategic Policy EC1 highlights that new-generation I&L development provides high quality and diverse jobs, with above average earnings and greater career progression potential. This job profile is fundamental to achieving Crawley's Vision (page 18 of the Plan) and strategy for Economic Growth & Social Mobility (page 103 of the Plan).
- 2.12 As a new-generation storage and logistics development, Gatwick Green will incorporate future-proofed digital communications in accordance with Strategic Policy IN3 (Supporting High Quality Communications).
- 2.13 In addition, it is intended that the Gatwick Green Campus will provide a skills and training centre on site to ensure that employees can access learning and personal development opportunities. The development will also provide an attractive environment with access to outside space that will enhance the wellness of those working there.
- 2.14 Through Policy EC2, CBC seeks to protect and enhance existing employment areas and, in particular, Manor Royal. GGL supports this policy and intends that the Gatwick Green Campus should provide complementarity with Manor Royal. This will be achieved by the provision of larger buildings than those

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			<p>which could be accommodated through future redevelopment of existing sites within Manor Royal. In fact, more than complementing Manor Royal, Gatwick Green will deliver agglomeration benefits that will strengthen existing businesses in Manor Royal and add value to the regional and local economy. More detail on complementarity and wider benefits can be found in Savills location and complementarity report appended to GGL's representations on Strategic Policies EC1 and EC4.</p> <p>2.15 All development creates traffic, but the Gatwick Green Campus will be designed to mitigate the impact of additional traffic movement by the provision of convenient and integrated sustainable transport and active mode options.</p> <p>2.16 An integral part of this is the provision of a Sustainable Transport Corridor through the site which will keep public and active modes of travel completely separate from HGV traffic. This will also serve to increase the travel options, not just for those working at the Gatwick Green Campus, but also local residents and those working at LGW. Sustainable buses will be routed through the Campus to provide not only an improved link to Horley, but also into LGW, via the proposal to open Buckingham Gate. In addition, there are significant opportunities to improve linkages into and expand the existing walking and cycle network.</p> <p>2.17 Mobility transport hubs will be introduced within the site. These are already proposed for Manor Royal and will allow for seamless interchange between ride sharing, public transport and non-motorised modes of travel in line with existing initiatives identified with the Crawley Growth Programme¹⁴ and Crawley New Directions¹⁵.</p> <p>2.18 GGL fully support the need of the planning and highway authorities to ensure that the road network is protected, and that HGV traffic does not route along inappropriate roads, especially those to the north, through Horley and Copthorne to the East. Balcombe Road itself is suitable to accommodate HGV traffic, which will be routed to Junction 10 on the M23 via the improved interchange on Crawley Avenue</p> <p>2.19 The proposals for the Gatwick Green Campus are fully compliant with the CBC Transport Study and the nature of the development outlined above, is unlikely to include 'last mile' or parcel delivery. More detail on the approach to travel and transport can be found in Appendix 2 to this representation.</p> <p>2.20 Draft Strategic Policy EC4 sets out a number of clauses to protect the amenity of those living nearby and environment and heritage assets, whilst also increasing the biodiversity and providing Public Open Space.</p> <p>2.21 Flood Risk and other assessments have already been undertaken and measures will be put in place to retain, where possible, existing ecology and landscape assets and to ensure that surface water can be</p>

¹⁴ Crawley Growth Programme, Unlocking Homes and Jobs, Crawley Borough Council, February 2023

¹⁵ New Directions for Crawley, Transport and access for the 21st century, Crawley Borough Council, March 2020

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			<p>appropriately attenuated prior to discharge into the drainage system. Where required, improvements to, or replacement of, Statutory Undertakers' plant will form part of the detailed development proposals.</p> <p>2.22 All these constraints have been taken into account in the refinement of the Gatwick Green Campus Development Framework Plan (DFP) and will be confirmed in more detail within the Masterplan required by the policy.</p> <p>3.0 Summary of Representation</p> <p>3.1 This representation sets out the evidence to support some <u>changes to Strategic Policy EC4 on the grounds that it is not sound as it has not been positively prepared</u>. This is because Strategic Policy EC4 unnecessarily duplicates Strategic Policy EC1 by including the outstanding need for employment land and expressing this as the minimum to be provided at Gatwick Green.</p> <p>3.2 The Council's evidence on future employment land needs supports a provision above 13.73 ha, and this has been quantified in evidence by Savills that identifies a requirement of 69 ha based on an analysis of future market demand. This evidence reinforces the need for Strategic Policy EC4 to be amended to make it sound by the deletion of the minimum land provision for Gatwick Green. As a consequence, there is no justification for the need for 'appropriate evidence' to support any additional land above the minimum. <u>To make the policy sound, item (a) of the policy should be deleted.</u></p> <p>3.3 The representation provides evidence to demonstrate that at a policy-level, Gatwick Green will be able to meet all the transport requirements in Strategic Policy EC4. However, it is considered that the policy and/or text should be amended to avoid an overly prescriptive approach to the control of turning movements on to / from Balcombe Road. The need to minimise HGV movements though Horley is recognised, but this will be addressed through the Transport Assessment and detailed design work: the prescriptive provision in policy is not therefore justified. Other minor changes are put forward to ensure clarity and flexibility around how planning obligations are addressed.</p> <p>3.4 Evidence is also presented to show the high level of complementarity between Gatwick Green, Manor Royal and the Horley Business Park in line with the intentions of the Impact Assessment required under Strategic Policy EC4. The evidence also demonstrates that Gatwick Green would meet the 'Delivery' requirements in Strategic Policy EC4.</p> <p>3.5 An assessment is contained in Appendix 3 that shows that the Gatwick Green proposals will be able to address all the development management requirements in Strategic Policy EC4. Evidence is also provided in support of the Council's SA/SEA and its conclusion that Strategic Policy EC4 is the most appropriate in suitability and environmental terms when compared with the other options.</p>

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			<p>3.6 Finally, the representation sets out the need for amendments to Strategic Policy EC4 to make it sound, and other proposed changes that would avoid an overly prescriptive transport provision and provide clarity in relation to planning obligations.</p> <p>4.0 Strategic Policy EC4 – purpose and scope</p> <p>4.1 On first principles, there ought to be a clear distinction between the purpose of Strategic Policies EC1 and EC4.</p> <p>4.2 Strategic Policy EC1 sets the economic strategy for Crawley in planning terms, dealing with the role of Crawley, the overall and outstanding need for employment land, and a spatial element that addresses the locations for growth, including the SEL at Gatwick Green.</p> <p>4.3 Strategic Policy EC4, on the other hand, should be a policy that is purely allocative, that identifies the site to meet the needs identified in Strategic Policy EC1, with the associated development management requirements. The justification for this distinction is outlined below.</p> <p>4.4 Strategic Policy EC4 allocates the whole of the Gatwick Green site for a Strategic Employment Location. However, the policy repeats at clause (a) the minimum outstanding need for employment land and floorspace of 13.73 ha stated in Strategic Policy. This is unnecessary for two reasons:</p> <p>(1) The place to identify in policy the economic growth needs of the borough is Strategic Policy EC1 – any repetition on Strategic Policy EC4 represents an unnecessary duplication.</p> <p>(2) It leads to a lack of clarity in that Gatwick Green is justified by the combined quantitative and qualitative evidence in the Council's ESG¹⁶ and Topic Paper 5, albeit that the evidence falls short by not quantifying future needs for I&L uses in market terms as PPG requires. Accordingly, the specification of minimum land and floorspace requirements in Strategic Policy EC4 is repetitious, misleading and could undermine achieving the Council's Vision and economic strategy. The evidence base exists to justify the development of the whole of Gatwick Green, without setting a minimum level of need and the related justification for additional development based on 'appropriate evidence' (clause (a)).</p> <p>4.5 In other words, the need should be the sole preserve of Strategic Policy EC1 and there is no justification for specifying a minimum employment land need of 13.73 ha, when the evidence demonstrates that there is greater need. Savills has undertaken an assessment of future market requirements for I&L uses, which has identified a need for 69 ha of I&L employment land (Appendix 2 to the representation on Strategic Policy EC1).</p>

¹⁶ Economic Growth Assessment, Supplementary Update for Crawley, Crawley Borough Council, January 2023

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			<p>4.6 The approach in the DCBLP has resulted in a policy structure that does not reflect the distinctions noted above.</p> <p>4.7 Based on the logic of the approach outlined above, Strategic Policy EC4 should solely identify the allocation of the SEL at Gatwick Green for new industrial land of <u>predominantly storage and distribution uses</u>. Consequently, a reference to any outstanding employment land need is not necessary, as this has been addressed in Strategic Policy EC1. Under this approach, any reference to the size of the SEL at 44 ha would simply be a reflection of the gross site/land area, with no reference to the land need figure. This approach is considered to be one which is sound in terms of being positively prepared for the following reasons:</p> <ol style="list-style-type: none"> 1. The outstanding need figure identified in Savills evidence of 59.8 ha is a gross land requirement – the size of Gatwick Green at 44 ha is also a gross land area. The two are therefore presented on the same basis, making the position of need versus provision clearer and directly comparable. 2. The interpretation and application of Strategic Policy EC4 would be then be far clearer. The revised policy would allocate the whole of Gatwick Green (44 ha), and from this, areas of land would be set aside for landscaping, buffers and BNG etc (policy clauses q, s, u and v) to arrive at an acceptable/sustainable masterplan. The need for a minimum land provision and a balance area to accommodate these requirements is removed, as they will be addressed within the overall site. 3. The removal of the 'minimum' land need allows the requirement for 'appropriate evidence' to justify any additional employment land above that 'minimum' to also be removed. This is due to the fact that the quantum of outstanding need is now far larger and that the need to describe the market evidence will form part of the Impact Assessment required under Strategic Policy EC4. 4. The need to justify any ancillary/complementary uses should be retained to ensure that these are required so as to support and enhance the main intention for the site to deliver strategic I&L development and are also proportionate. <p>4.8 The approach outlined above would provide a clear distinction between the role and purpose of Strategic Policies EC1 and EC4 by identifying the overall and outstanding needs in Strategic Policy EC1, and then allocating the whole of Gatwick Green at 44 ha for I&L uses to meet that need. Strategic Policy EC4 should therefore allocate the Site in response to Strategic Policy EC1, alongside all the development management requirements, compliance with which will result in a sustainable and appropriate masterplan. The final net developable area will be a product of the masterplanning process.</p> <p>5.0 Requirements for Gatwick Green under Strategic Policy EC4 Transport requirements</p> <p>5.1 Clause c to i of Strategic Policy EC4 set out the requirements / guidance with regard to movement and accessibility for Gatwick Green. The policy-level transport work undertaken by GGL's consultants shows</p>

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			<p>that Gatwick Green can be delivered in line with these clauses, although there is one where some adjustment is merited so as to avoid an overly prescriptive obligation.</p>
			<p>5.2 GGL fully supports the need of the planning and highway authority to ensure that the road network is protected, and that HGV traffic does not route along inappropriate roads, especially those to the north, through Horley and Copthorne to the East. However, the final sentence of clause (d) of the policy requires that <i>“HGV traffic will not be allowed to enter Gatwick Green from the north on Balcombe Road, and will not be allowed to egress the site via a right turn onto Balcombe Road”</i>. As currently worded, this is <u>overly prescriptive and could have unintended consequences in terms of the design and layout of the access arrangements</u>, the internal road network, and the efficient operation of the Gatwick Green site.</p>
			<p>5.3 It is not necessary for Strategic Policy EC4 to be prescriptive in this regard, since clauses c, d, and e of the policy provide the planning authority and the local highway authorities with the opportunity to address potential issues as part of any subsequent planning application. These requirements are summarised as follows:</p> <ul style="list-style-type: none"> • Policy EC4 (c) – requires a Transport Assessment to support the application and to demonstrate that there will be no severe residual impact on the local and strategic road network. • Policy EC4 (d) – requires the application to produce a comprehensive Mobility Strategy detailing infrastructure improvement that will be required to adequately mitigate the development impacts on the highways network, detailing how these improvements will be delivered and operated. • Policy EC4 (e) – 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.
			<p>5.4 The <u>suggested change to the wording of Strategic Policy EC4 is as follows:</u> <i>“The Mobility and Access strategy is required to deliver a mitigation package that discourages or prevents HGV traffic on unsuitable roads and specifically restricts HGV movements through Horley.”</i></p>
			<p>5.5 If the Inspector considers it necessary, additional words could be added in the supporting text to note the Council’s concerns regarding north turns and that this will be addressed as part of the highway and access material required to be submitted under the policy.</p>
			<p>5.6 Strategic Policy EC4 precludes the payment of a sustainable transport contribution, as Gatwick Green will need to address its own impacts. However, it is not clear that this relates to the contribution formula provided for in the Planning Obligations Annex in the DCBLP. The policy wording could therefore preclude one-off financial contributions towards off-site works under a s106 contribution. It is considered that this could be clarified with a minor change to paragraph 9.63 of the DCBLP.</p>

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			<p>5.7 In line with PPG, it is important that there is flexibility in how off-site transport infrastructure is delivered, which could be through works or financial contributions. Strategic Policy EC4 and the supporting text does not make this clear and the Plan would benefit from some amendments to clarify that such flexibility exists and that the developer will work with the Council to ensure the necessary improvements are delivered to ensure that the proposals are acceptable in planning terms.</p> <p>5.8 Overall, Gatwick Green can be developed so as to provide an industrial-led development that benefits from a highly sustainable pattern of movement and access consistent with guidance in the NPPF and the Council's sustainable transport strategy. Gatwick Green can therefore be developed in a way that achieves sustainable transport outcomes. These matters will be addressed at the planning application stage via a TA and MS with obligations that can be guaranteed via planning conditions / a s106 agreement. A more detailed review of how Gatwick Green will fulfil the requirements of Strategic Policy EC4 is contained in Appendix 3.</p> <p>Impact Assessment</p> <p>5.9 Strategic Policy EC4 requires an Impact Assessment at the planning application stage to demonstrate how the SEL will address Crawley's identified need for industrial focused business floorspace and how such will be complementary to key employment areas within Crawley, the Horley Business Park (HBP - south of Horley in Reigate and Banstead Borough) and other key planned strategic employment sites in the functional economic market area (Crawley Borough, Mid-Sussex District and Horsham District).</p> <p>5.10 Savills Strategic Logistics Report (Appendix 4) addresses the locational drivers of I&L uses and the complementarity of Gatwick Green with the Manor Royal Business District (Manor Royal) and HBP. The assessment concludes that Gatwick Green would be complementary to these existing/proposed business areas, which will cater for different segments of the market.</p> <p>5.11 Topic Paper 5 (para 4.2-4.7) characterises Manor Royal as a mixed use employment area dominated by small and mid-box units. HBP is proposed as a strategic business park of predominantly offices and a complementary range of commercial, retail and leisure facilities. Both these employment areas are very different to the strategic I&L uses to be accommodated at Gatwick Green in large to very large units. Such uses are not provided for at the HBP and cannot be accommodated at Manor Royal without detriment to its overall function and purpose.</p>

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			<p>5.12 Topic Paper 5 also considers proposed employment areas in Mid Sussex and Horsham¹⁷ where, again, the employment areas are very different to the strategic I&L uses to be accommodated at Gatwick Green in large to very large units.</p> <p>5.13 Therefore, the evidence demonstrates that Gatwick Green is in line with the intention of the Impact Assessment that it is complementary to other employment areas – the ‘Delivery’ requirements of Strategic Policy EC4 will ensure this matter is monitored and kept under review for all phases of Gatwick Green.</p> <p>Delivery Policy requirements</p> <p>5.14 Strategic Policy EC4 requires planning conditions and obligations in respect of the provision of on-site and off-site physical, social and green infrastructure. These obligations will include economic impact testing, the delivery of the objectives of the Crawley Employment and Skills programme and the development of a masterplan in consultation with the Council to be advanced at the outline planning application stage to guide future detailed applications.</p> <p>5.15 As noted at paragraphs 5.9 - 5.13, Gatwick Green would complement the existing employment sites in Crawley and the wider area – biannual impact testing will be undertaken throughout the implementation period to comply with this requirement. In terms of employment and skills, it is envisaged that Gatwick Green will include a provision for education uses to support apprenticeships & staff development and training, whilst an Employment and Skills Plan will be developed to source local labour for the construction and operational phases.</p> <p>5.16 A masterplan will be prepared taking account of the policy-level baseline surveys and investigations already undertaken for the DCBLP Examination. These will be supplemented by further detailed technical, urban design and environmental investigations to inform a comprehensive masterplan for the Site. For the purposes of the DCBLP Examination, a conceptual Development Framework Plan (DFP) has been prepared (Appendix 5), which illustrates the green framework for the Site comprising the adjacent priority habitat; peripheral hedgerows (including some classified as ‘important’); the extent of the Biodiversity Opportunity Area, and the key transport corridors / hubs.</p> <p>Deliverability – tenure, funding and viability</p>

¹⁷ (1) Burgess Hill Science & Technology Park, Mid Sussex District (49 ha), and (2) Land north of Horsham (proposed 500,000 sq.ft (46,450sqm) modern, high quality business park for business and office uses, including for smaller business space and start-ups)

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			<p>5.17 GGL sets out its case in relation to the deliverability of Gatwick Green in its separate representations on the Employment Land Trajectory (ELT). These representations conclude as follows:</p> <ul style="list-style-type: none"> • GGL controls all the land within the area allocated for Gatwick Green. • There is a small part of the site subject to an encumbrance on title – this would not materially affect the development of the site or the delivery of a comprehensive masterplan to deliver a strategic I&L campus. • Given the significant interest GGL has received from occupiers, investors and funders, it is confident that the proposals can be developed in a sustainable and comprehensive manner. • The Council's plan-wide viability assessment¹⁸ has concluded that <i>“The Gatwick Green site appears to have the potential to support a more certain or stronger viability outcome, with a wide range of our sensitive tests producing RLVs either well in excess of greenfield land values on the established EUV+ basis again, and values representing serviced, ready to develop industrial land (equivalent to PDL values) also potentially supportable”</i>. • Savills Economics has undertaken a review of the Council's viability assessment (Appendix 6) which supports the Council's findings and concludes that <i>“We agree with the overall conclusion of the viability evidence that the proposed Gatwick Green allocation is deliverable and generates a Residual Land Value in excess of Greenfield Land Values....”</i> <p>5.18 GGL also has sufficient funding and will draw in additional funding via a development agreement / JV so that the finance is in place to ensure that Gatwick Green can be developed in a sustainable and comprehensive manner. GGL is therefore able to deliver the development of Gatwick Green in line with the provisions in Strategic Policy EC4.</p> <p>5.19 Paragraph 9.58 of the DCBLP outlines a timeframe for the delivery of Gatwick Green over seven to ten years, with completion in 2040. This envisages Gatwick Green being developed over the latter part of the Plan period. However, the demand for strategic I&L uses is now apparent and most likely to endure for the next ten years or more. Based on the market evidence and an assessment of the lead-in times to secure approval to a masterplan and a hybrid planning application, the most likely delivery programme for Gatwick Green would be:</p> <table border="0"> <tr> <td>DCBLP adoption with Gatwick Green allocated</td> <td>mid - 2024</td> </tr> <tr> <td>Development of Masterplan</td> <td>autumn 2024 - early 2025</td> </tr> <tr> <td>Preparation of hybrid planning application</td> <td>end 2024 - mid 2025</td> </tr> <tr> <td>Submit hybrid planning application</td> <td>mid 2025</td> </tr> </table>	DCBLP adoption with Gatwick Green allocated	mid - 2024	Development of Masterplan	autumn 2024 - early 2025	Preparation of hybrid planning application	end 2024 - mid 2025	Submit hybrid planning application	mid 2025
DCBLP adoption with Gatwick Green allocated	mid - 2024										
Development of Masterplan	autumn 2024 - early 2025										
Preparation of hybrid planning application	end 2024 - mid 2025										
Submit hybrid planning application	mid 2025										

¹⁸ Crawley Borough Council Local Plan Review: Whole Plan Policies & CIL Viability Assessment – Final Report Issued March 2021 (DSP19682 – Final v8), Dixon Searle Partnership, March 2021

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			<p>Hybrid planning application granted planning permission early 2026</p> <p>Complete of s106 & pre-commencement conditions spring 2026</p> <p>Construction of phase 1 mid 2026 - mid 2027</p> <p>Reserved Matters approved for further phases mid 2026 - mid 2027</p> <p>Construction of further phases mid 2027 – 2035</p> <p>5.20 Given the evidence on the urgency of meeting the identified need for strategic I&L development and the most likely development programme noted above, the delivery programme outlined in paragraph 9.58 is a mis-match with the likely delivery. Paragraph 9.58 of the DCBLP should therefore be amended to reflect the programme identified above. This will ensure that the DCBLP reflects the need to be sound such that it is 'positively prepared' and 'effective' as the NPPF requires.</p> <p>Development management requirements</p> <p>5.21 Appendix 3 provides evidence that demonstrates that the Site can be developed in accordance with the development management requires set out at c to i (movement and accessibility), j to m (Sustainable Design and Construction), n (digital technology), and o to v (character and design). The one provision where an adjustment to policy is warranted, relates to the last sentence of clause d as noted at para 5.4 above.</p> <p>Conclusions</p> <p>5.22 Overall, the technical and environmental evidence produced by GGL and contained in the 2020 Appendices and more recent assessment updates (Appendices A to E of Appendix 3) demonstrate that at a policy-level, there are no issues or matters that would militate against the comprehensive development of the Site, in accordance with the various development controls contained in Strategic Policy EC4 and other policies of the DCBLP, as noted. Indeed, all feasibility investigations to date indicate that whole Site can be developed such as to promote a range of environmental, design and sustainability policy objectives, whilst delivering a viable and complementary scheme that can offer the range of benefits noted in this representation.</p> <p>6.0 Sustainability</p> <p>6.1 The Council has assessed the alternative options in its Sustainability Appraisal¹⁹ (SA/SEA). This evaluated three options: (1) allocate a SEL only through Strategic Policy EC1, (2) allocate a SEL through a dedicated local plan policy that sets out the site-specific requirements for the site, and (3) explore the scope to allocate an industrial-led SEL through an Area Action Plan. Option 2 was selected as it allowed for detailed matters relating to the amount and type of business floorspace, transport and access, design and amenity and</p>

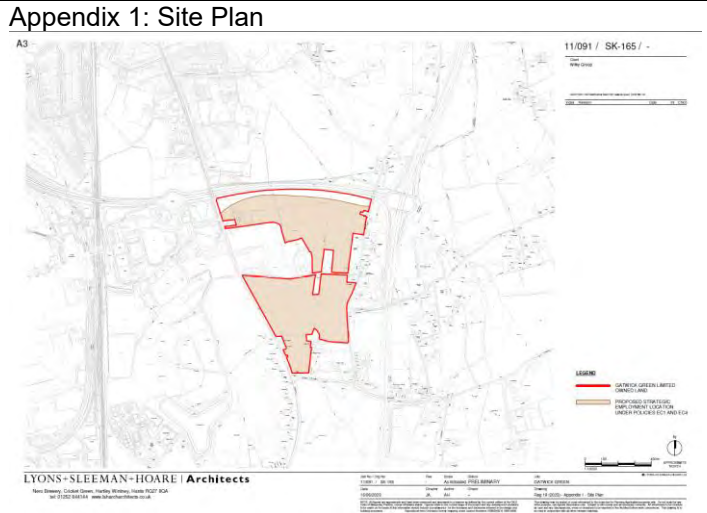
¹⁹ Crawley Borough Council Local Plan Review | Sustainability Appraisal / Strategic Environmental Assessment, Draft Report, For the Submission Local Plan, May 2023

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			<p>environmental considerations to be addressed in policy and provide a framework to achieve a sustainable development through a masterplan and planning application.</p> <p>6.2 The Council's approach is supported in that it has allowed for the Gatwick Green SEL to be identified as part of the overall economic strategy for the Borough articulated in Strategic Policy EC1, with the detailed matters relating to site / development requirements to be addressed separately in a site-specific policy (Strategic Policy EC4).</p> <p>7.0 Implications for Strategic Policy EC4</p> <p>7.1 It is considered that there is unnecessary duplication of the employment land needs in Strategic Policy EC4, when these are already stated in Strategic Policy EC1 albeit that they are too low. This overlap would result in uncertainty in terms of the interpretation and application of both policies.</p> <p>7.2 There is therefore no justification for the inclusion at clause (a) of Strategic Policy EC4 of a minimum land need of 13.73 ha or consequently the need for 'appropriate evidence' to justify development above that level. Clause (a) of Strategic Policy EC4 is <u>not therefore considered to be sound</u> as it has <u>not been positively prepared so as to meet the minimum objectively assessed needs of the Council's area, and that the supporting text at paragraph 9.58 is not sound with regard to evidence on the earlier delivery of any development</u>. Therefore, in order to ensure that Strategic Policy EC1 and the supporting text at paragraph 9.58 are sound, the following changes to Strategic Policy EC4 and paragraph 9.58 are sought:</p> <ol style="list-style-type: none"> 1. <u>The minimum land provision of 13.73 ha in clause (a) should be deleted to make the policy sound.</u> This unnecessarily duplicates the land need contained in Strategic Policy EC1 – this is an economic strategy matter best contained only in Strategic Policy EC1. 2. The requirement in clause (a) for 'appropriate evidence' to justify any additional land above the minimum should be deleted to make the policy sound. Without the inclusion of a minimum employment land need figure in Strategic Policy EC4, there is no need for any requirement for 'appropriate evidence' to justify the development of any additional land because the whole site has been allocated to meet the demonstrable need. The comprehensive evidence base provided by the Council and Savills shows that the overall need for strategic land for I&L uses can be quantified through market analysis as 69 ha – this is the land need figure that should form the basis for Strategic Policy EC1. 3. Paragraph 9.58 should be amended with regard to the development programme for Gatwick Green for the paragraph to be sound. <p>7.3 Appendix 7 sets details of the changes to Strategic Policy EC4 and paragraph 9.58 that are being sought. In the event the Inspector considers that Strategic Policy EC4 and paragraph 9.58 should be amended as</p>

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			<p>noted above, there will be a need for consequential changes to the supporting text of the policy (9.53 and 9.58).</p> <p>7.4 Based on the evidence in this representation, further revisions to Strategic Policy EC4 have been advanced in this representation and may be justified:</p> <ol style="list-style-type: none"> 1. The last sentence of clause (d) should be substituted by the following: <i>“The Mobility and Access strategy is required to deliver a mitigation package that discourages or prevents HGV traffic on unsuitable roads and specifically restricts HGV movements through Horley.”</i> This will avoid an overly prescriptive policy provision, allowing for flexibility in how the underlying policy objective of avoiding HGV impacts in Horley can be achieved. If the Inspector considers it necessary, additional words could be added in the supporting text to note the Council’s concerns regarding north turns and that this will be addressed as part of the highway and access material required to be submitted under the policy. 2. Planning Practice Guidance (PPG) states that developers may be asked to provide contributions for infrastructure in several ways (Paragraph: 003 Reference ID: 23b-003-20190901). Therefore, on this basis and in order to maintain flexibility, Strategic Policy EC4 and paragraph 9.63 could be amended to provide for a flexible approach to the provision of infrastructure associated with the development of Gatwick Green. The wording of Strategic Policy EC4 could also be adjusted to provide flexibility in how transport infrastructure is provided through planning obligations requiring funding or works. 3. Strategic Policy EC4 (e) states that as Gatwick Green will be required to address its own highway impacts, a s106 sustainable transport contribution will not be sought. This approach is supported by GGL, but it needs to be made clear that this contribution relates to that identified through the formula contained in the Planning Obligations Annex. As worded in the policy, it could exclude other one-off contributions towards sustainable transport related to addressing the specific impacts of Gatwick Green. This clarification can be provided through a minor amendment to clause d of the policy and paragraph 9.63 of the DCBLP.

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Appendix 2: Outline Transport and Access Appraisal

1.0 Introduction

Background

1.1 This transport appraisal has been prepared by Empiric Partners and Steer (the transport consultants) on behalf of the Wilky Group (TWG). It provides a supporting Appendix to the representation by Savills relating to Strategic Policy EC4, Strategic Employment Location, in the Draft Crawley Borough Local Plan, (DCBLP) Submission Publication Consultation: May – June 2023 . It specifically addresses the ‘Movement and Accessibility’ provisions within Strategic Policy EC4 (provisions c – i) and sets out, at a policy level, how the proposals for Gatwick Green will comply with these provisions.

1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.

1.3 This appraisal should be read in conjunction with the Crawley Transport Study Report (CTSR - Transport Study of Strategic Development Options and Sustainable Transport Measures). The CTSR specifically considers an industrial-led Strategic Employment development at Gatwick Green of predominantly B8 storage and distribution uses: this is reflected in the central scenario tested by the Council’s consultants (Stantec) (Scenario

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			<p>2), comprising of 77,500 square metres (SQM) (GFA) split into: B8 Parcels Distribution (10%), B8 Commercial Warehousing (60%) B2 Industrial estate (30%).</p> <p>Strategy</p> <p>1.4 The overall transport strategy for the Gatwick Green proposal is based on current transport practices including the philosophy which requires the application of an accessibility 'hierarchy': which assumes that, for employees, there will be a priority order of transport mode based on cycling/walking, bus, train and then private car. This ensures that the emphasis is placed first on sustainable transport modes before transport by private-car. This Appendix confirms that the proposed development meets the criteria defined in Strategic Policy EC4, specifically to ensure that:</p> <ul style="list-style-type: none"> • A Transport Assessment will be provided to demonstrate that appropriate access can be provided to the Site; • A Mobility Strategy is prepared to show optimisation in the use of sustainable modes; • A decide and provide approach to infrastructure delivery is identified to mitigate development impacts; • The access strategy delivers a mitigation package that discourages HGV traffic on unsuitable roads and specifically restricts HGV movements through Horley; • Improvements to public transport infrastructure are defined; • Upgrades to cycle and pedestrian facilities are achievable; and • Appropriate levels of on-site parking are provided in the context of the approach to sustainable transport. <p>1.5 The freight movements associated with the proposed uses can only use HGV-borne transport, requiring this traffic to be accommodated on the existing highway network in the most sustainable manner. Over time, the continued switch to hydrogen-powered HGVs, (which is expected to become common place over the early years of operation at Gatwick Green), will significantly improve the environmental and sustainability profile of this traffic.</p> <p>1.6 The development scheme will be designed in accordance with the mitigation strategy identified within the CTSR and will bring forward a package of measures aimed at delivering non-car access as a priority, whilst ensuring the local highway network can accommodate predicted vehicular traffic. Whilst some car-borne traffic is inevitable, measures will be put in place to ensure trips are completed as sustainably as possible and that these measures assist with improving conditions for all users at a local level to encourage modal shift.</p> <p>1.7 This appraisal is not intended to fulfil the requirements of a Transport Assessment, (TA) but does provide a policy-level appraisal of the impacts of the scheme, and related mitigation, using parameters which typically form the basis of a TA and which have been discussed with West Sussex County Council as Highway Authority whilst also taking account of the findings of the CTSR. It therefore defines an access and mobility strategy which demonstrates that the Site can be accessed in a sustainable manner and that there are no major transport constraints or impediments which would prevent development of the Site.</p>

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			<p>Transport Assessment</p> <p>1.8 Following consultation with the relevant local authorities and stakeholders, a full Transport Assessment and Mobility Strategy will be provided in support of a Planning Application.</p> <p>1.9 The Transport Assessment will be undertaken in accordance with the requirements of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG) and, more particularly, the four key transport tests identified by paragraph 110 of the Framework, as summarised below:</p> <ul style="list-style-type: none"> • Will the opportunities for sustainable transport be taken up appropriately? • Will safe and suitable access be provided? • Will the design of streets, parking areas and other transport elements be acceptable? • Will the traffic impacts be acceptable? <p>Report structure</p> <p>1.10 The remainder of this report is structured as follows:</p> <p>Section 2 – sets out the details of the proposed access strategy;</p> <p>Section 3 – sets out the outline mobility strategy to show how the development will optimise the use of sustainable modes of transport;</p> <p>Section 4 – provides an indication of improvements to public transport facilities and infrastructure;</p> <p>Section 5 – identifies potential upgrades and extensions to pedestrian/cycle routes;</p> <p>Section 6 – demonstrates that consideration has been given to the impacts of the development on the highway network along with some initial assessment of the infrastructure improvements required to avoid or mitigate such impacts;</p> <p>Section 7 – confirms that appropriate levels of on-site parking will be provided; and</p> <p>Section 8 – Summarises the findings and conclusions.</p> <p>2.0 Access Strategy</p> <p>2.1 The Site has ample frontage onto Balcombe Road, both north and south of Fernhill Road, as well as frontage onto Antlands Lane. It is currently proposed that two separate access points will be provided into the Site from Balcombe Road. There is no direct access planned to the M23, M23 spur or Junction 9A of the M23 spur.</p> <p>2.2 The two junctions would be capable of operating independently (from each other), but could be linked via an internal spine road if necessary or desirable, through the evolution of the masterplan. A separate priority access will be provided for a Sustainable Transport Corridor (STC) through the site for pedestrians, cyclists and buses. This will provide a safe route through the Site for these modes of travel and thereby promote alternatives to the private car.</p> <p>2.3 This access strategy is in line with the modelling contained within the Crawley Transport Study Report (CTSR).</p>

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			<p>2.4 The STC will also be served by two public transport / mobility hubs that will enable safe and efficient transfer from bus / cycle modes to pedestrian mode, including a potential range of transfer facilities (bicycle racks, shelters, real-time information etc) to ensure a high level of service.</p> <p>2.5 All junctions have been designed to accord with the latest guidance and best practice. The accesses have been sized, (and modelled) to accommodate likely traffic flows associated with the proposed development and flows associated with background traffic i.e. a cumulative assessment. This is based on trip generation rates, derived from TRICS, (and in line with those considered in the CTSR which will be reviewed as the mobility strategy progresses.</p> <p>2.6 The development is likely to be constructed on a phased basis, with the necessary infrastructure being delivered at the time it is required. Given the recent changes in travel behaviour, as well as anticipated changes in the way in which mobility is considered, the Council's infrastructure delivery plan should be as flexible as possible. This is in line with latest 'Decide and Provide' guidance promoted by TRICS.</p> <p>Northern Access</p> <p>2.7 Access to the northern section of the Site will most likely be provided via traffic signal controlled junction. The proposed junction is currently designed to maximise capacity by the provision of two lanes at the stop line on each approach.</p> <p>2.8 Almost immediately opposite the proposed junction is a gated and unused access from Balcombe Road onto Buckingham Gate, which provides onwards access to the Gatwick Airport Road network. The Gatwick Green strategy does not prejudice the reinstatement of this access for pedestrians and cyclists accessing the South Terminal, or the significant benefits that could be derived if the access were reinstated for buses. It is acknowledged that the reinstatement of this access will require collaboration between West Sussex County Council, Gatwick Airport and Crawley Borough Council. This is not critical to achieving an acceptable transport strategy for the Site but does offer some wider benefits and so is supported by TWG.</p> <p>Southern Access</p> <p>2.9 Access for general traffic into the southern section of the Site will be provided by a new three arm roundabout on Balcombe Road. This would be the primary access point to the Site, given the propensity for most traffic to arrive from/depart to the south.</p> <p>2.10 Where necessary, it is proposed that the junction would accommodate new and improved pedestrian and cycle facilities.</p> <p>Antlands Lane Access</p> <p>2.11 There is also an opportunity to provide access to Gatwick Green from Antlands Lane using the frontage of Balcombe Road and Antlands Lane. The development at Forge Wood has identified potential improvements at</p>

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			<p>this junction in the form of signalisation. These improvements are included within the CTRS modelling. The delivery of Gatwick Green could bring forward additional land to further improve the junction, including the provision of priority to buses, pedestrians and cyclists.</p> <p>Operational Assessments</p> <p>2.12 Initial assessments of the northern and southern access points identified above have been undertaken. These are based on anticipated future traffic flows on Balcombe Road, including those associated with the allocation of the Horley Business Park (HBP) under Policy HOR9 of Reigate & Banstead Borough Council's Development Management Plan (DMP): this involves a proposed primary access via junction 9a of the M23 and very limited traffic access via Balcombe Road.</p> <p>2.13 The northern and southern Site access junctions will be designed to work within their theoretical design capacities providing for future year traffic, with the additional trips generated by development at Gatwick Green (GG). The northern junction (signalised) is the most sensitive of the two, although there are no fundamental concerns in catering for the anticipated demand, whilst accommodating pedestrian, cycle and bus priority.</p> <p>2.14 The north and south junctions would provide a high-quality access to the new development and critically, would do so without generating any significant detriment to the operation of Balcombe Road.</p> <p>Limiting HGV traffic on inappropriate roads</p> <p>2.15 In line with Policy ST1, EC4 (c, d and e) any application(s) on the Site will be required to produce a Transport Assessment(s) which will be subject to a thorough review by the Local Highway Authority, National Highways and neighbouring authorities. These applications will be required to produce an Access and Mobility strategy which will include measures to restrict Heavy Goods Vehicles, (HGVs) to the most appropriate roads. This will ensure that such traffic does not utilise parts of the highway network which are not suitable for the defined vehicles.</p> <p>2.16 There are a number of ways in which HGV routing can be managed and conditioned to prevent the use of unsuitable routes. These include, but are not limited to the design of the masterplan, the location of access points, banning specific turning movements at site accesses and in the vicinity of the site and the implementation of weight restrictions on specific roads.</p> <p>2.17 During the scoping of the Transport Assessment and Mobility and Access Strategy, consultation with the relevant highway and planning authorities will determine the most effective way of restricting HGV movements to and from the site, so as to avoid traffic routing north through Horley and east through Cophorne, (via the B2037).</p> <p>2.18 In respect to development at Gatwick Green specific attention will be given to addressing issues around HGV traffic arriving from and / or travelling;</p>

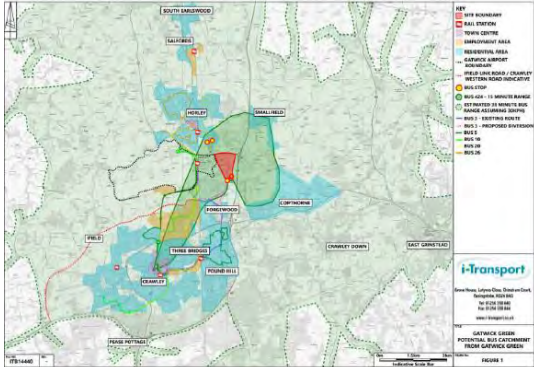
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			<ul style="list-style-type: none"> • On Balcombe Road (north of the Site), and; • To the immediate east of the site via Antlands Road, (B2037). <p>2.19 The package of measures to deter / ban HGV traffic from unsuitable roads, is to be agreed with the local highway and planning authority at the application stage and will be secured through a Section 106 agreement.</p> <p>Accommodating the proposed Gatwick Airport DCO and Southern Runway</p> <p>2.20 The proposed access strategy for Gatwick Green has respected the proposals for both the Gatwick DCO, based on plans shared by Gatwick Airport Limited (GAL) and the Gatwick Airport Master Plan (GAMP, 2019), potential Southern runway, based on the surface access strategy (2019) published by GAL. In summary;</p> <ul style="list-style-type: none"> • Land to the north of the site has been safeguarded by TWG which allows for proposed roads and embankments associated with both the DCO scheme and the Southern Runway Scheme. The latter identifies a diversion of Balcombe Road to a location adjacent to and west of the M23 motorway and along the southern side of the M23 Spur. • The position of the northern access to GG does not prejudice the widening of the M23 spur over bridge proposed by GAL within the DCO. • The northern diversion of Balcombe Road can be accommodated within the safeguarded land designated to the north of the Gatwick Green Site allocated in the Draft Crawley Borough Local Plan. • Access through the existing (unused) Buckingham Gate to Gatwick Station and airport can be retained in both scenarios. • The Southern Runway surface access does not prejudice the delivery of a southern access into Gatwick Green from Balcombe Road. • The Gatwick Green development does not prejudice the delivery of the proposed grade separated junction as shown on the Southern Runway surface access plans and the network can be configured to retain access between the proposed car parks to the East and South of Gatwick Green. This can be achieved through the use of existing adopted roads, notably, Balcombe Road, Fernhill Road and Antlands Lane. <p>Construction phase</p> <p>2.21 Any planning application will be accompanied by a Construction and Environmental Management Plan (CEMP), which will ensure that all the junctions and the proposed construction phase of the development can be delivered with minimal impact on the highway network. The CEMP may include the identification of temporary construction access points, as part of any measures to minimise impacts.</p> <p>Access Summary</p> <p>2.22 In the context of the NPPF transport tests, it is demonstrated that the Site benefits from two main deliverable points of access, plus a dedicated entry/exit point for cyclists and pedestrians, ensuring safe and suitable routes are provided for all modes.</p>

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			<p>2.23 The TA and Access Strategy will include a package of measures designed to deter HGV trips from unsuitable roads, especially to the north and within Horley and to the east through Cophthorne.</p> <p>2.24 The proposed access strategy does not prejudice the delivery of either the Gatwick DCO access scheme, or the Southern Runway Surface Access strategy.</p> <p>3.0 Policy Review</p> <p>3.1 As required by Policy EC4, TWG is committed to delivering a Mobility Strategy in line with the aspirations of both WSCC and CBC to establish a multi-modal, comprehensive and flexible Sustainable Transport Network.</p> <p>3.2 The Mobility Strategy will draw on the excellent location of the Site to deliver development which can be accessed via a range of travel modes, with public transport, walking and cycling at its heart.</p> <p>3.3 The location of new development in proximity to existing residential areas will reduce levels of “out-commuting” and, therefore, the length of trips, through the provision of a range of high-quality employment opportunities which will diversify and improve the skill-base of residents in Crawley and its immediate neighbours.</p> <p>3.4 Given its sustainable location within Crawley’s boundary and close to existing employment areas and neighbourhoods, there is an opportunity to link the Site into established bus and Fastway routes and the emerging Fastway development programme. Targeted improvements to pedestrian and cycle routes will also benefit both existing residents and future travellers to Gatwick Green.</p> <p>3.5 Transport and access for the Site would also be supported by a Full Travel Plan and associated environmental strategy with the aim to promote the use of sustainable travel options, including measures such as car clubs and digital travel platforms and to deliver Virtual Mobility.</p> <p>3.6 The proposed approach to access, traffic impacts and sustainable transport are subject to ongoing discussions with Local Highway Authorities of West Sussex and Surrey County Councils, (WSCC and SCC); National Highways (NH); Crawley Borough Council (CBC), and the local Fastway and bus operator, Metrobus. In preparing this work, the following transport policies and documents were considered:</p> <ul style="list-style-type: none"> • National Planning Policy Framework (July 2021); • Draft Crawley Borough Council Local Plan 2020 – 2035; • West Sussex County Council Local Transport Plan (1 April 2022); • The proposals within the Crawley Borough Council (CBC) Growth Programme; • New Directions for Crawley - Transport and access for the 21st century (Crawley Borough Council) (March 2020);

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			<ul style="list-style-type: none"> • The Gatwick Airport Master Plan (GAMP, 2019), which proposes the use of the existing emergency runway (take-off only) as an operational runway for regular use in dependent operating modes with the existing main runway; • The Development Consent Order (DCO) (Scoping Opinion) for the expansion of Gatwick Airport through use of the standby runway as submitted (October 2019). The currently identified improvements are noted and any additional information will be examined, and proposals considered as the DCO progresses. This will be considered in preparing the Transport Assessment for the planning application; • The committed and proposed measures which form part of the Coast to Capital Growth Fund and those indicated in the Gatwick 360 Strategic Economic Plan; • National Highways - Strategic road network and the delivery of sustainable development (December 2022) • The published Transport Strategy for the South-East, TfSE 2022; • Freight, Logistics and Gateways Strategy; TfSE 2022 • Local Transport Note 1/20 – Cycle Infrastructure Design (27 July 2020) • The Network Rail improvements to Gatwick Railway station; • Priorities and future aspirations of the transport network providers and operators; • The committed and proposed development in the area, which includes promoted strategic schemes at pre-planning stage; • Guidance and best practice, including Manual for Streets (MfS) and Manual for Streets 2 (MfS2); • Gear Change – A bold vision for Walking and cycling (DT – July 2020); • Decide and Provide Guidance (TRICS March 2021); and • Active Travel England - Statutory Consultee Guidance 1 June 2023. <p>3.7 The Covid-19 crisis, aligned with the Climate Emergency has and will continue to have profound effects on traffic volumes, travel patterns and how people travel. The trends which emerge over time will be fully accounted within the Transport Appraisal and measures to reflect such trends included in the final strategy adopted for Gatwick Green.</p> <p>3.8 The approach adopted by TWG is described in the following sections and confirms that in the context of the NPPF Transport tests, there will be enhanced opportunity for sustainable travel, attracting new users and simultaneously discouraging travel by private car.</p> <p>3.9 The approach promoted by TWG accords with the modelling assessment undertaken by Crawley to support the Local Plan, as summarised in the Transport Study of Strategic Development Options and Sustainable Transport Measures Report (CTRS), which is supported by New Directions for Crawley – Transport and access for the 21st century, March 2020. In this context, the overarching objectives of the Mobility Strategy will be to:</p>


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			<ul style="list-style-type: none"> • Provide a masterplan with sustainable movement and active travel at its heart, including a Sustainable Transport Corridor (STC) with dedicated pedestrian, cycle and public transport provision alongside public transport / mobility hubs; • Promote the extension of the Fastway development programme; • Link the Site to existing public transport infrastructure and the three local railway stations; • Improve walking and cycling infrastructure in the local vicinity and link the Site to the network of routes to be delivered through Crawley's Local Cycling, Walking, and Implementation Plan (LCWIP); • Contribute towards the delivery of the LCWIP; • Encourage users of the proposed development as well as encourage residents from developments such as Forge Wood and Steers Lane to use these facilities rather than the car; and • Promote sustainable travel options through a comprehensive Travel Plan. <p>Policy Summary</p> <p>3.10 The proposed development is compliant with all guidance published to date and takes full account of National, Regional and Local Authority Transport policies, including the Regional TfSE Transport Strategy and the Logistics Freight and Gateways Strategy published by TfSE.</p> <p>4.0 Mobility Strategy - Public Transport</p> <p>Bus Travel</p> <p>4.1 Bus stops are located on Balcombe Road / Meadowcroft Close to the north of the Site and on Antlands Road to the south of the Site. The locations of these bus stops provide different opportunities to travel to a range of destinations including Horley, Crawley, Reigate and Redhill.</p> <p>4.2 The bus stops on Balcombe Road / Meadowcroft Close are located some 1.3km to the north of the Site i.e., outside of typical walking distance and are served by route 26, which provides four services a day on Mondays, Wednesdays and Fridays. These provide a route to Horley and the nearby suburbs. The bus stop on Antlands Lane is some 1.2km from the centre of the Site and provides a more frequent, hourly service Monday to Saturday via bus service 424. This route provides the opportunity to travel to Crawley, Horley, Reigate and Redhill.</p> <p>4.3 While there are bus services which operate within the local area, due to limited development in the immediate vicinity of the Site, the local bus infrastructure is limited. Figure 1 (also included in Appendix A) summarises a potential bus catchment assuming up to 15 and 30 minute journey times to the Site.</p>

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			<p data-bbox="701 284 1097 300">Figure 1 - Potential Bus Catchment Area for Gatwick Green</p>  <p data-bbox="701 694 1332 726">The Bus and Fastway Strategy for Gatwick Green</p> <p data-bbox="701 726 2027 901">4.4 The operator of bus services and Fastway in Crawley has been consulted and is closely involved in the development of the basis for a Bus and Fastway Strategy for Gatwick Green. As such an endorsement has been received from Patrick Warner, Head of Innovation Strategy in an email which contains the following statement: <i>“It is with great pleasure that we are able to confirm that we have been collaborating with Wilky Group and Empiric Partners in the creation of a draft transport strategy to support the proposed Gatwick Green development.</i></p> <p data-bbox="701 909 2027 1093"><i>Our shared vision as detailed in their strategy mentions zero emission buses, the future evolution of the highly successful Fastway network and the upcoming delivery of the first 'Superhub' mobility hub concept in Manor Royal. These are all high quality complimentary public transport assets that are subscribed to fully by us and a wide coalition of local stakeholders. We look forward to the opportunity to continue to work with Wilky Group, Empiric Partners, the planning and highway authorities to ensure that they are taken forward during any forthcoming planning process for Gatwick Green”.</i> Patrick Warner, 15th June 2021.</p> <p data-bbox="701 1109 2027 1197">4.5 The strategy has four components, each designed to improve services, increase demand amongst existing travellers and form lasting “habits” amongst those working and visiting the new development at Gatwick Green. The four components are:</p> <ol data-bbox="701 1204 2027 1380" style="list-style-type: none">1. Strengthening existing services to offer an improved frequency and greater flexibility to those living and working along the Balcombe Road corridor or those travelling to origins and destinations within the Gatwick area. This could include:<ol style="list-style-type: none">a. The existing service number 3 (Crawley Town Centre - Forge Wood – Gatwick South Terminal) being extended and diverted into the Site;b. Fastway 10 being extended to serve the Site; and

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			<p>c. Further opportunities to extend bus services 4 and 5 to serve the development.</p> <p>2. To provide a safe and prioritised route for buses travelling through the heart of the new development, offering faster journey times to encourage greater use of services as part of CBC's wider aspirations to deliver Fastway across the Borough. This could be delivered via:</p> <p>a. Dedicated access e.g., bus gate, priority incorporated into the junctions and on the approaches to Site access junctions.</p> <p>b. An internal site layout designed to incorporate the extension of the Fastway network through the provision of priority to buses, with a Sustainable Transport Corridor through the Site.</p> <p>3. To deliver mobility hubs which significantly improve waiting facilities and achieve better integration between active and carbon-neutral modes of travel and public transport services.</p> <p>4. To ensure that Gatwick Green is a key player in the creation of high quality connections between new residential and employment areas, including links with Reigate and other nearby centres in line with CBC aspirations.</p> <p>4.6 The investment in zero carbon vehicles by Metrobus, in conjunction with CBC and other partners, has offered a key to improvements in air quality and an illustration of the benefits of transferring journeys by private car to public transport. Gatwick Green will promote this evolutionary approach, by providing a new development which recognises the climate change agenda and supports the delivery of high quality public transport services and their integration with active and carbon-neutral modes of travel.</p> <p>4.7 The approach to providing twin accesses onto Balcombe Road/Antlands Lane, offers an opportunity to divert existing services or provide a new Fastway/bus route which will penetrate the Site. This will incidentally provide additional services to Balcombe Road, benefitting residents and businesses and potentially new development along the route towards Horley.</p> <p>4.8 Public transport provision for the Site will, therefore, be integrated into the Fastway Development Programme and, subject to further analysis, provides an opportunity for additional funding to be made available to enhance the network of routes through targeted investment and the provision of new infrastructure. The Site could for example be linked via public transport to Manor Royal, Crawley Town Centre and the emerging development opportunities at Ifield (which includes 10,000 homes located within Horsham District) and the planned Horley Business Park.</p> <p>4.9 Within the Site, on the Sustainable Transport Corridor (STC), small public transport / mobility transport hubs and/or 'Super Hubs' will be developed. An illustration is provided below at Image 1.1. These hubs, which are already planned as part of a pilot scheme at Manor Royal, would act as a bus Fastway waiting area, but would potentially have expanded facilities such as shelters, Wi-Fi, phone charging, coffee outlet, charging and storage for electric bike and electric scooters (subject to legislation).</p>

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			<p data-bbox="703 284 1055 304">Image 1.1. – Public Transport / Mobility Hub</p>  <p data-bbox="703 699 2018 788">4.10 This type of infrastructure allows for seamless and hassle-free interchange between ride sharing, public transport and non-motorised modes of travel and is in line with existing initiatives, such as those identified within the Crawley Growth Programme and Crawley New Directions.</p> <p data-bbox="703 810 837 831">Rail Travel</p> <p data-bbox="703 839 2018 895">4.11 The Site is located within the vicinity of three local railway stations, with the closest being Gatwick Airport to the west. Horley Railway Station is located to the north, whilst Three Bridges is located to the south.</p> <p data-bbox="703 917 2018 1034">4.12 The Local Plan supporting evidence refers to station improvements at Crawley and Three Bridges which are included within the Crawley Growth Programme, while Gatwick Airport station is to be significantly improved and upgraded, alongside improved access to local Fastway bus services. These improvements will enhance the transport interchanges and help achieve modal shift from the private car.</p> <p data-bbox="703 1056 999 1077">Gatwick Airport Station</p> <p data-bbox="703 1085 1995 1141">4.13 Gatwick Airport is located some 1.7km from the centre of the Site and provides an opportunity to travel to key destinations including London Victoria, Brighton, Horsham, Cambridge, Peterborough and Reading.</p> <p data-bbox="703 1163 2018 1279">4.14 A scheme to improve Gatwick Airport Railway Station is currently underway and could be complete by the end of 2023, including measures to improve accessibility, widening platforms 5 and 6 and installing new escalators, stairways and lifts. In addition, the size of the railway concourse will be increased and connections to the airport terminals and passenger wayfinding will be upgraded.</p>

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			<p>4.15 It is possible to access the station from Gatwick Green via existing pedestrian facilities and via Ring Road South, as well as via the Public Right of Way network using Footpath 359Sy. The station is also within easy cycle distance from the Site, via relatively quiet roads.</p> <p>4.16 Pedestrian and cycle access between Balcombe Road and the station is expected to be improved as part of the DCO submission, as well as the Gatwick Airport Master Plan (GAMP, 2019).</p> <p>Horley Railway Station</p> <p>4.17 Horley Railway Station is located some 2.3km from the centre of the Site and provides the opportunity to travel on the rail network with direct links to a variety of stations including Peterborough, London Bridge and Horsham. The railway station is within a reasonable cycle distance and there are 76 cycle spaces at the station. It can also be accessed using bus service 26 and 424. It is possible to access Horley Railway Station via Balcombe Road. At least one footway is provided along Balcombe Road and continues along Victoria Road from the roundabout. This footway continues to Horley Railway Station. An additional route via Footpaths 362a, 360 and 355a from Balcombe Road and across the railway line up to the station is also available.</p> <p>Three Bridge Railway Station</p> <p>4.18 Three Bridges Railway Station is located some 5.2km from the centre of the Site and provides opportunities to travel to similar destinations to Horley and Gatwick Airport stations. Three Bridges has a station car park in addition to 276 cycle spaces. It is possible to access the station via Balcombe Road, Milton Mount Avenue and Worth Park Avenue. Although crossing points are limited in some locations at least one footway is provided for the entire route. A shared footway / cycleway is provided along Worth Park Avenue on approach to Three Bridges Railway Station.</p> <p>Station Accessibility Improvements</p> <p>4.19 As part of the package of measures to improve and enhance accessibility, localised improvements to walking, cycling and Fastway routes will be brought forward which will improve accessibility between the Site and the local railway stations.</p> <p>Mobility Strategy Summary – Public Transport</p> <p>4.20 The public transport strategy is consistent with CBC's New Directions (2020) and the WSCC Local Transport Plan (2022). The aspirations of local policies to achieve economic growth whilst promoting low or zero carbon transport lie at the heart of the public transport strategy for GG.</p> <p>5.0 Walking and Cycling</p> <p>5.1 One of the main transport / connectivity objectives for the Development is to deliver direct and safe connections which prioritise access on foot, bike or bus to/from neighbouring communities and places of</p>

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			<p>employment, This includes improving existing cycling and walking infrastructure that link the development to neighbouring communities and to avoid severance.</p> <p>5.2 Paragraph 4.4.1 of the Manual for Streets states: <i>“Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes’ (up to about 800m) walking distance of residential areas which resident may access comfortably on foot. However, this is not an upper limit and PPG13 states that walking offers the greatest potential to replace short car trips, particularly those under 2km. MfS encourages a reduction in the need to travel by car through the creation of mix-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance for most residents”</i></p> <p>5.3 The DfT’s Cycling and Walking Investment Strategy (2017) states at Paragraph 1.16 that: <i>“...there is significant potential for change in travel behaviour. Two out of every three personal trips are within five miles – an achievable distance to cycle for most people, with many shorter journeys also suitable for walking. For school children, the opportunities are ever greater. Three quarters of children live within a 15-minute cycle ride of secondary school while more than 90% live within a 5-minute walk or bus journey from a primary school.”</i></p> <p>5.4 The DfT’s Gear Change A Bold Vision for Cycling and Walking states (page 11) that: <i>“In particular, there are many shorter journeys that could be shifted from cars, to walking, or cycling. We want to see a future where half of all journeys in towns and cities are cycled or walked. 58% of car journeys in 2018 were under 5 miles. And in urban areas, more than 40% of journeys were under 2 miles in 2017-1817. For many people, these journeys are perfectly suited to cycling and walking.”</i></p> <p>5.5 Against this background:</p> <ul style="list-style-type: none"> • 1.6km (circa 1mile) is a reasonable walking distance for most people and many journey purposes although some people may walk further (2km is referred to in Manual for Streets); and • 8km (circa 5 miles) is a reasonable cycle distance for most people and many journey purposes, although some people, do cycle in excess of 8km on a regular basis. The use of e-bikes increases the range that cyclists will travel as well as reducing the effects of any gradients on routes and journey times. <p>5.6 The National Travel Survey (NTS) 2019 identifies the mode share of journeys of different lengths: the majority (80%) of trips are undertaken on foot for journeys up to one mile. The data also shows that approximately 31% of journeys between one and two miles (3.2 km) will be on foot i.e., a significant proportion of people are prepared to walk for journeys up to two miles.</p> <p>5.7 The Chartered Institution of Highways and Transportation (CIHT) guidance ‘Planning for Walking’ (2015) further states that: <i>“Across Britain, approximately 80% of journeys shorter than 1 mile are made wholly on foot – something that has changed little in 30 years. The main reason for the decline in walking is the fall in the total number of journeys shorter than 1 mile, which has halved in thirty years. It is not that people are less likely to make short journeys on foot but rather that fewer of the journeys they make can be accomplished on foot. If</i></p>

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			<p><i>destinations are within walking distance, people are more likely to walk if walking is safe and comfortable and the environment is attractive.”</i></p> <p>5.8 Locating employment within one mile (1.6km) of residential development and local facilities and services will provide the greatest opportunity for trips to be made by foot. One mile is not however, the maximum that people are prepared to walk, it is clear from the NTS data that around one-third of journeys between one and two miles are undertaken on foot.</p> <p>5.9 Data provided within the National Travel Survey (NTS) demonstrates that the average distance per journey by bike is approximately 4.4km, with the current average length of an employment and leisure cycle trip some 5.2km. On this basis, a cycle distance of 5km is considered reasonable.</p> <p>5.10 Furthermore, more people are acquiring e-bikes, which enable greater distances to be covered in shorter times travel. E-bikes are particularly useful for people who, for example, need to ride in business clothes, to ride up hills, to travel long distances, or who are older or less fit and discouraged by the physical effort of an ordinary bike. Journeys by e-bike of up to 8km are not uncommon.</p> <p>5.11 The promotion of walking for short trips and cycling for increasingly longer distances, (because of the emergence of powered cycles), alongside conventional and demand responsive public transport networks is important and forms a key part of the Authorities’ ambitions. It is central to The Crawley Transport Strategy, ‘New Directions’ and Crawley Growth Programme.</p> <p>5.12 The proposal will contribute towards a defined strategy to link existing and developing residential areas, employment opportunities and day-to-day facilities, within Crawley town centre, Horley, Forge Wood, Manor Royal, Three Bridges and Gatwick Airport in line with ‘15 minute Neighbourhood’ principles.</p> <p>5.13 This will enable the development of infrastructure and transport services that cater for carbon-neutral modes of travel, potentially reducing reliance on the private car and in line with the concept of Mobility as a Service (MAAS), and the Governments ambition for a stepchange in the number of walking and cycling trips undertaken daily.</p> <p>5.14 Figure 2 (included as Appendix A) shows a typical walk distance of 15 and 20 minutes from the Site.</p> <p>5.15 Figure 3 (also included as Appendix A) shows a typical cycle distance of 15 and 20 minutes to the Site.</p> <p>5.16 It is evident that the development is within one mile (1.6km) of existing (Horley and Tinsley Green) and emerging development areas (Forge Wood and Steers Lane), which will provide the greatest opportunity for a significant proportion of trips to be made on foot. The Site is also within with a 20 minute cycle of large parts of Crawley and Horley.</p>

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Figure 2 - Typical 15-20 minute Walk distance to / from Gatwick Green

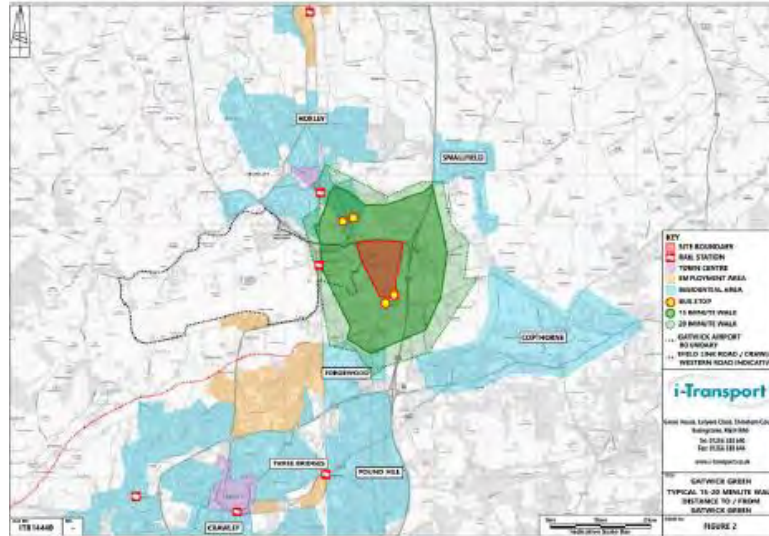
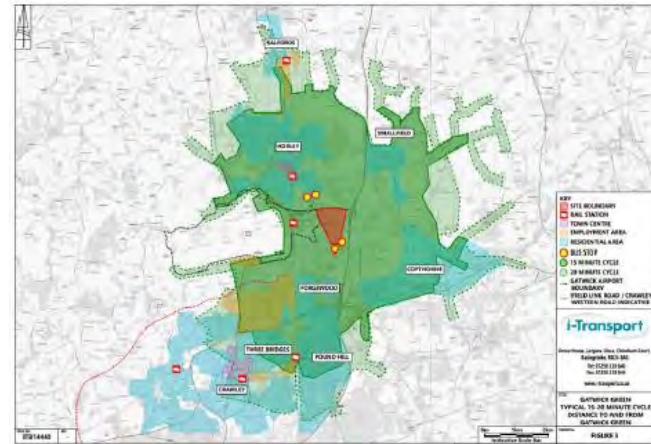



Figure 3 - Typical 15-20 minute cycle distance to and from Gatwick Green



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			<p>Public Right of Way Network</p> <p>5.17 There are several public rights of way in the local area (Image 5.1). An existing public footpath runs through the northern part of the Site and connects onto Balcombe Road. Opposite the junction of Ferndown Road on Balcombe Road, adjacent to the southern development parcel, the network of public rights of way continues west providing access into Gatwick Airport and the Rail Station. As part of the package of sustainable transport measures, there will be an opportunity to improve this network, providing traffic free routes between residential areas and existing and future employment. This will both reduce the need for people to travel by private car and enhance the opportunity for sustainable travel modes to be taken up.</p> <p>Image 5.1 - Existing Public Rights of Way</p>  <p>Local Cycling, Walking, and Implementation Plan (LCWIP)</p> <p>5.18 The Government's first Cycling and Walking Investment Strategy (CWIS) (published in 2017) set out initiatives to make walking and cycling the natural choice for shorter journeys or as part of a longer journey. LCWIPs are a new strategic approach to identifying cycling and walking improvements required at the local level and enable a long-term approach (ideally over a 10-year period) to developing local cycling and walking networks. They form a vital part of the Government's strategy to increase the number of trips made on foot or by cycle.</p>

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Crawley LCWIP
 5.19 The Crawley LCWIP identifies functional, direct routes and zones and outlines measures to develop these into a connected network. It will inform the new Local Plan, guiding building development, and is an important contribution to New Directions for Crawley, the council’s transport and access plan.

5.20 As stated in the Crawley Transport Study, “*Investment in walking and cycling infrastructure to access key destinations and public transport services, will lead to greater uptake in active travel, healthier lifestyles, reduced carbon emissions, improved air quality, and a reduction in traffic volumes.*”

5.21 The Gatwick Green site is ideally placed to link into and assist in the delivery of pedestrian and cycling links, especially those identified within the Crawley Local Cycling, Walking, and Implementation Plan (LCWIP) (March 2021). An extract from the Crawley LCWIP, (Image 5.2) is provided below.

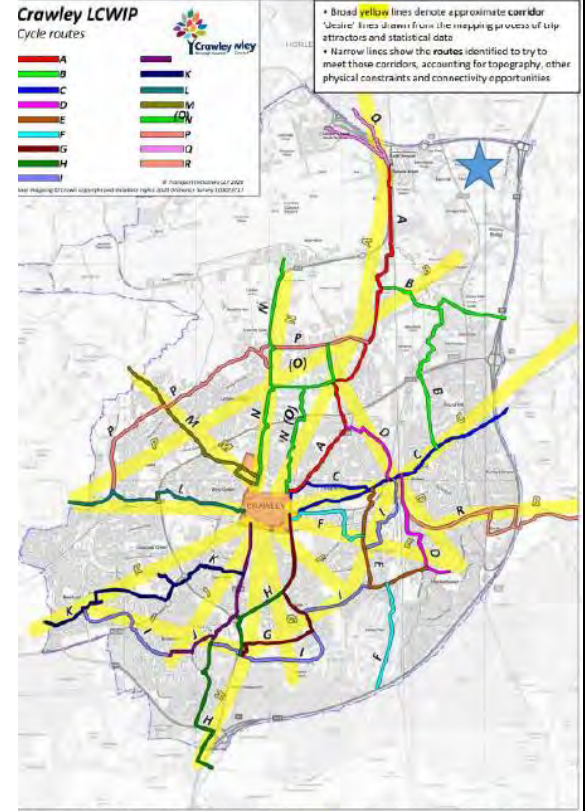
5.22 There are opportunities to improve walking and cycling facilities on Balcombe Road to the north and south of the Site, with the potential to link the Site to the proposed routes A and B. In this respect, the Site is well located to the existing centre of Crawley and its northern suburbs (Pound Hill, Three Bridges, Northgate, Langley Green and Ifield), central Horley, the emerging residential areas such as Forge Wood, and complementary employment areas of Manor Royal and Gatwick Airport.

5.23 These opportunities align with the modelling associated with the Crawley Transport Study Report. The detail of these routes will be included within the Transport Assessment following consultation with relevant stakeholders.

Reigate and Banstead LCWIP

5.24 The Reigate and Banstead LCWIP includes the following scheme pertinent to the Gatwick Green site.
 • Phase 1 Westvale Park (Meath Green) to Horley Railway station via Horley Town Centre.
 • Phase Horley to Gatwick South Terminal (via Balcombe Road). This route would aim to connect Horley town centre to Gatwick Airport. Approximate length: 2.5 kilometres.

Image 5.2: Crawley Local Cycling, Walking and Implementation Plan (LCWIP)



Source: Extract from Page 22 of Crawley LCWIP – Gatwick Green site represented by star

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			<p>Mobility Strategy Summary – Walking and Cycling</p> <p>5.25 The transport strategy for Gatwick Green includes:</p> <ul style="list-style-type: none"> • Providing high quality walking and cycling routes within the Site. The delivery of facilities in line with latest guidance will prioritise and encourage travel via the walking and cycling network, reducing dependency on travel by private motor vehicles; • Providing improved connections to existing and proposed walking and cycling improvement schemes and plugging the ‘missing gaps’ on Balcombe Road and local roads to improve walking and cycling facilities; and • Contributing towards the delivery of the Crawley Local Cycling and Walking Infrastructure Plan and local upgrades to cycle and pedestrian facilities in the vicinity of the area as well as improving Public Rights of Way. <p>6.0 Traffic Impact and Infrastructure Improvement</p> <p>6.1 In advance of a full Transport Assessment, initial junction capacity assessments have been undertaken for the local highway network.</p> <p>6.2 This is based on traffic surveys completed in January 2020 (following agreement with WSCC that they represent typical operating conditions). These counts are worse case, since they were undertaken at a time when the economy was functioning normally, prior to the Covid-19 crisis. It is likely that there was higher than usual demand on Balcombe Road and surrounding roads in response to the ongoing traffic management on the M23 associated with the implementation of the Smart Motorways scheme.</p> <p>6.3 Future year traffic forecasts were derived which included planned and committed development at, Forge Wood; Steers Lane, and Copthorne.</p> <p>6.4 Based on the traffic generation, assignment and distribution, local junctions in the vicinity of the Site were tested using industry standard modelling tools. The identified capacity issues generally occur in the peak hour and for short periods, where there is a “mini” peak within that period. On this basis, it is reasonable to conclude that investing in a scheme to alleviate peak hour capacity is not an efficient use of capital funding. An alternative approach, (consistent with CTSR) would focus on investment in schemes which promote modal shift and provide benefit throughout the day and have more positive merit in delivering improvements to public transport and active travel modes.</p> <p>6.5 Rather than follow an exclusive ‘Predict and Provide’ approach to addressing capacity issues, the Gatwick Green mobility strategy is designed to follow the ‘Decide and Provide’ philosophy in a way which complements the aspirations of WSCC and CBC. In this context it is pertinent to understand how changes in travel patterns and future opportunities will impact upon demands and to develop a range of plausible scenarios which can be developed and tested, to understand their impacts on the surrounding transport network.</p>

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			<p>6.6 The strategy for the Site is, therefore, to consult with the local highway authorities (WSCC and SCC) and Crawley Borough Council (CBC) to derive a holistic approach to mobility in the area, which may include proposals for some additional highway capacity schemes where appropriate.</p> <p>Crawley Transport Study Report (Transport Study of Strategic Development Options and Sustainable Transport Measures Draft Crawley Local Plan 2021 – 2037) (December 2020)</p> <p>6.7 Crawley published its study into the impact of the development proposed in the Local Plan in May 2021. The report specifically considers an industrial-led development of predominantly storage and distribution uses under use class B8 at Gatwick Green, comprising of 77,500 square metres (SQM) (GFA) split into: B8 Parcels Distribution (10%), B8 Commercial Warehousing (60%) B2 Industrial estate (30%). This is referenced as Scenario 2 within the modelling report.</p> <p>6.8 The Report (CTSR) identifies the impacts likely to arise for planned development when no interventions are included and then considered mitigation in the form of modal shift resulting from improvements to pedestrian, cycling and public transport facilities. Where these interventions do not address congestion hotspots, additional ‘capacity’ improvements are identified, either in the form of modest junction amendments, or improvements to signal timing and equipment.</p> <p>6.9 The ‘Decide and Provide’ approach set out in the CTSR is in line with the latest thinking and Government Policy, aimed at delivering sustainable interventions before physical capacity improvements. The mitigation identified builds on the existing Fastway network within Crawley and the already identified and costed improvements to walking and cycling as set out in the LCWIP.</p> <p>Modelling parameters</p> <p>6.10 A review of the modelling parameters has been undertaken in order to test the robustness of the model, for the Local Plan purposes.</p> <p>Trip generation</p> <p>6.11 The model considers a range of different land uses and their likely trip generation, which is consistent with Local Plan modelling. It is noted that the trip rate used by CDC in their modelling assumptions for B8 Parcel Distribution is a significant over estimation of the likely number of vehicles which would be generated by that land use. There are limited parcel distribution sites within TRICS and one site included within the assessment is the DHL Headquarters in Slough, which includes a large proportion of office use. Experience of other sites included in TRICS and from sites surveyed elsewhere has identified blended trip rates of 0.465 (morning peak hour) and 0.811 (evening peak hour) per 100sqm, compared to CDC’s guide rate of 1.508 vehicles two way.</p>

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			<p>6.12 Other rates within the CDC modelling are equally robust and as such, once traffic is assigned and distributed across the network, variations in the type and mix of development within the model are unlikely to be noticeable.</p> <p>Modal Shift</p> <p>6.13 As set out in the Crawley Transport Study, the modal shift assumption assumed in the Draft Crawley Local Plan modelling are conservative assumptions, proportionate to the scale of the development sites proposed. There is potential to achieve higher levels of reductions in future as peoples' attitudes towards movement change, with more people choosing to travel by sustainable and low carbon modes.</p> <p>6.14 With a greater mode shift towards cycling, further investment in bus priority measures and continued changing trends in working practices along with virtual mobility, it is likely that there will be greater uptake of sustainable travel modes, and less reliance on private car trips during the Local Plan period. This could translate, in future, to higher levels of sustainable travel using sustainable modes and cutting down on car use.</p> <p>6.15 In summary, there is the potential for sustainable mitigation to play a bigger role in future and thus minimise or eliminate the need for extensive physical mitigation. Contributions from development sites towards targeted highway and junction improvements, on a 'decide and provide' approach to highway capacity rather than the 'predict and provide' approach will ensure that investment is targeted at improving conditions for all users. This will avoid the provision of highway capacity improvement schemes which have typically been implemented at the expense of public transport, walking, and cycling, without solving long terms issues around mobility and accessibility.</p> <p>Summary of results</p> <p>6.16 Section 7.8 of the CDC report identifies that the unmet demand at almost all junctions analysed can be addressed through sustainable mitigation measures. These measures would include:</p> <ul style="list-style-type: none"> • Limited bus priority measures to increase uptake of bus ridership; • The delivery of the LCWIP to increase uptake in active modes walking and cycling; and • Increased Virtual Mobility, particularly working from home which would lead to reduced car travel at peak times. <p>6.17 The report identifies that in respect to Scenario 2 and 3, the sustainable travel interventions could mitigate the impacts of the development in most locations. However, the Ifield Roundabout/Ifield Avenue/A23 Crawley Avenue junction would benefit from a modest improvement in terms of improving capacity on its link approaches.</p> <p>6.18 It should be noted that a junction operating at or over its theoretical capacity in a future year does not mean that the junction will operate unsatisfactorily or be unsafe.</p> <p>6.19 With the decide and provide approach identified by CDC, it would not be best practice to identify and implement capacity led mitigation schemes at all junctions which were at stress or over capacity. To do so would</p>

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			<p>only replicate past mistakes, where additional capacity has induced more demand. A monitor and manage approach should be taken whereby an Infrastructure Delivery Plan can be developed, creating a transport budget out of which transport improvements to serve the development would be funded for the purpose of achieving the preferred vision.</p> <p>6.20 The need for capacity improvements can then be reviewed prior to implementation in accordance with the preferred vision and ensuring that road capacity schemes are only considered after all other options have been explored.</p> <p>6.21 The report confirms that any impacts on the Strategic Route Network (SRN) i.e., the M23 and associated junctions, can be mitigated through planned improvements and signal optimisation.</p> <p>6.22 The strategy identified by Crawley, though the CTSR modelling report, is wholly in line with the mobility strategy identified for Gatwick Green. As such, development at Gatwick Green provides the opportunity to deliver improved walking, cycling and public transport infrastructure, with targeted junction improvements. This approach will not only mitigate the impacts of the development, but also assist in the delivery of the Local Plan as a whole, as these active mode improvements will benefit existing residents and businesses as well as those travelling to Gatwick Green.</p> <p>Traffic Impact Summary</p> <p>6.23 In advance of a full Transport Assessment being produced an initial assessment has been undertaken on a first principles basis. This identified that with a suitable mitigation package in line with Policy EC4 requirements that Gatwick Green can come forward safely and without any severe residual capacity or safety impacts.</p> <p>6.24 CBC has developed a transport strategy, which:</p> <ul style="list-style-type: none"> • Considers the cumulative impacts of development; • Robustly assess the impacts of Gatwick Green; • supports a decide and provide approach to mitigation; • will deliver modal shift; and • Allows for additional mode shift as a result of other interventions if necessary. <p>6.25 It is evident that the traffic modelling is suitably robust for the purpose of allocating development.</p> <p>7.0 Provision of Parking</p> <p>7.1 Whilst the parking provision on Site is a matter for planning, normally determined at the Reserved Matters stage, the masterplan will be developed after considering:</p> <ul style="list-style-type: none"> • Assumptions on changing travel behaviour and modal shift; • Local Parking Standards for commercial uses; • A parking accumulation analysis utilising TRICS arrival and departure patterns throughout a typical day;

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			<ul style="list-style-type: none"> • Experience of other similar sites; • Input from typical end users; and <p>7.2 A full detailed analysis will be provided within the Transport Assessment that will accompany any planning application. This will identify that:</p> <ul style="list-style-type: none"> • Adequate parking for cars and HGVs will be provided in line with local parking standards; • That there will be no overspill parking onto local roads; • Adequate lay-over parking with associated facilities will be provided for HGVs to ensure that there is no HGV parking off site and that any parking is appropriately provided for; • Facilities will be provided for Electric Vehicle charging; • Opportunities for alternative future fuelling, such as hydrogen will be considered, and • Space will be provided for Car Clubs and priority spaces for car/ride sharing etc. <p>Parking for Gatwick</p> <p>7.3 The Gatwick Green development does not prejudice the delivery of the Southern Runway surface access plans identified in the Airport Masterplan. The network can be configured to retain access to GAL’s remaining proposed airport car parks via Balcombe Road, Fernhill Road and Antlands Lane (see Appendix B).</p> <p>8.0 Summary and Conclusion</p> <p>Summary</p> <p>8.1. The Wilky Group (TWG) propose to bring forward an innovative industrial and logistics development and co-ordinated infrastructure solution to deliver the 47 ha (116 acre) Gatwick Green site allocation which lies within the heart of the Gatwick Diamond.</p> <p>8.2. This Appraisal has been undertaken in support of the Regulation 19 representation by Savills on behalf of TWG on the Draft Crawley Borough Local Plan (Submission Publication Consultation: May – June 2023).</p> <p>8.3. The Gatwick Green allocation has been tested in terms of its impacts on the strategic and local transport networks, both by TWG and through Crawley’s CTSR. Both studies conclude that the impacts of Gatwick Green can be addressed and mitigated through a combination of improved infrastructure for walking, cycling and public transport, alongside some targeted capacity improvements. The CTSR additionally concludes that the impacts arising from the Local Plan generally, including Gatwick Green, can be adequately dealt with.</p> <p>8.4. The allocation proposal will bring forward a package aimed at delivering non-car access as a priority, whilst ensuring that the local highway network can accommodate predicted vehicular and HGV traffic. While some car-borne traffic is inevitable, measures will be put in place to ensure trips are completed as sustainably as possible. The transport strategy includes:</p>

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			<ul style="list-style-type: none"> • Delivery of an access strategy and internal layout with a Sustainable Traffic Corridor (STC) which prioritises on-site public transport (Fastway) provision, with high quality walking and cycling routes in line with latest emerging guidance; • An access strategy which will deter HGV users from Inappropriate roads, including those in Horley and Copthorne. • Contributions towards strengthening existing Fastway and bus routes and delivery of targeted Fastway/bus infrastructure, including bus priority and transit routes alongside enhancing existing pedestrian and cycle routes. • Plugging the 'missing gaps' and connecting to both the Crawley and Reigate and Banstead Borough Councils Local Cycling and Walking Infrastructure Plan. • A 'Decide and Provide' approach to highway capacity rather than the 'Predict and Provide' approach which has led to capacity improvement schemes designed to accommodate car based journeys at the expense of public transport, walking, and cycling. • The emerging masterplan and proposed access strategy do not prejudice the delivery of either the Gatwick DCO or the Second Runway surface access strategy. <p>8.5. The proposal will contribute towards a defined strategy to link existing and developing residential areas, employment opportunities and day-to-day facilities within Crawley town centre, Horley, Forge Wood, Manor Royal, Three Bridges and Gatwick Airport in line with the principle of the '15 minute Neighbourhood'. This will enable the development of infrastructure and transport services that cater for carbon-neutral modes of travel, potentially reducing reliance on the private car and in line with the concept of Mobility as a Service, (MAAS) and the Government's ambition for a step change in the number of walking and cycling trips undertaken daily.</p> <p>8.6. The allocation proposals can therefore meet Strategic Policy ST1 which sets out the requirements for development in relation to sustainable transport. The objectives of the policy are set out below, followed by how the Gatwick Green proposals can fulfil these (in italics):</p> <ul style="list-style-type: none"> • Locating and designing development to prioritise and encourage travel via the walking and cycling network and public transport routes, while reducing dependency on travel by the private motor vehicle. <i>Gatwick Green is located in a highly sustainable location between Crawley and Horley, offering significant opportunities to provide infrastructure that prioritises public transport.</i> • Development should contribute 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. <i>Gatwick Green can bring forward a range of off-site sustainable transport infrastructure to support and advance the use of public transport for access to the Site and more widely in Crawley.</i> • Development should provide an appropriate amount and type of parking in accordance with Policy. <i>Gatwick Green will include appropriate parking provision aligned with the sustainable transport strategy for the Site.</i>

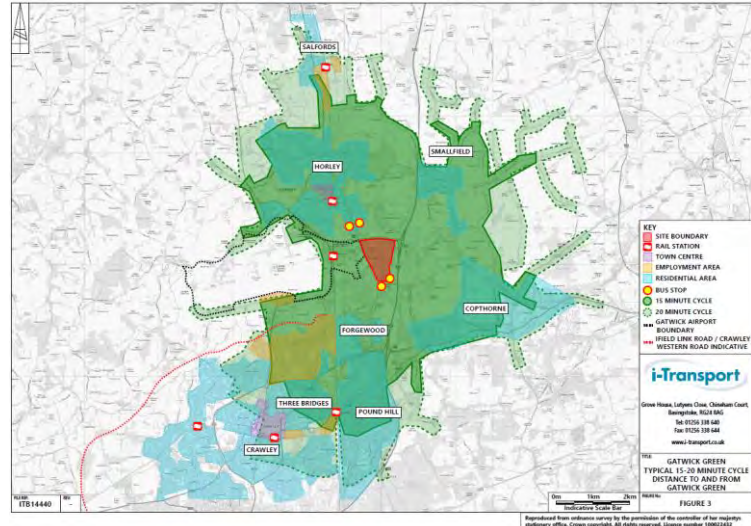
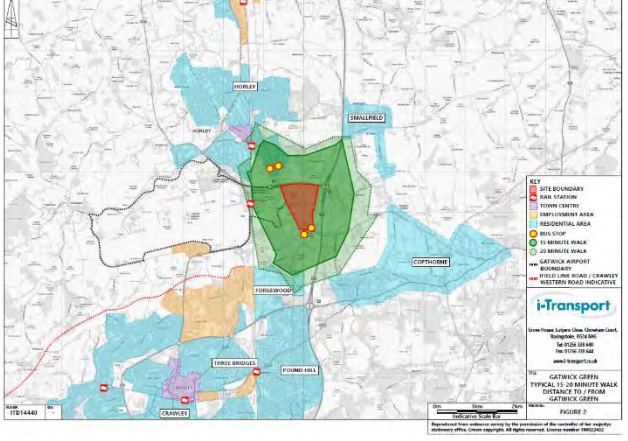
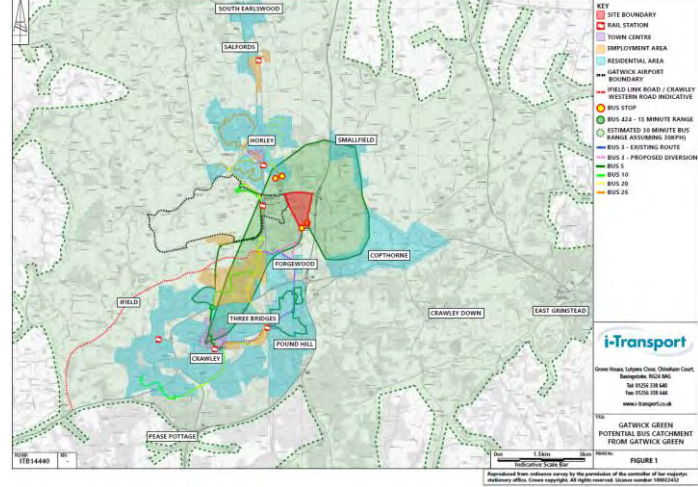
Chapter 9. Economic Growth			
Ref. No.	Respondent	Policy/ Para	Comments
			<ul style="list-style-type: none"> • Developments should not cause an unacceptable impact in terms of increased traffic congestion or highway safety. <i>The CTSR and TWG's transport investigators demonstrate that Gatwick Green can be developed without unacceptable harm in terms of highway capacity and safety.</i> • Development 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. <p><i>The CTSR concludes that with mitigation, the cumulative impacts of the DCBLP proposals on Crawley's transport networks and in terms of highway safety are acceptable.</i></p> <p>Conclusions</p> <p>8.7. This appraisal contains the findings of an initial assessment of access and transport considerations to support the allocation of the Gatwick Green site.</p> <p>8.8. The Appraisal work has identified that there are no fundamental issues to access, promoting sustainable travel or mitigating traffic impacts. Any applications will be supported by a full Transport Assessment to demonstrate that the proposals can be accessed sustainably and would not have a severe impact upon the local highway network.</p> <p>8.9. Initial assessments for a mobility strategy demonstrate how the Site will be integrated into the existing network, with off-site improvements aimed at promoting sustainable modes of travel for both future users of the Site and existing residents / businesses;</p> <p>8.10. Any planning application will be accompanied by a range of infrastructure improvements to active travel and public transport to cost effectively mitigate development impacts;</p> <p>8.11. Proposals to improve accessibility to the Site by public transport have been discussed and agreed in principle with Metrobus and the proposed site layout will bring forward bespoke public transport infrastructure;</p> <p>8.12. Local upgrades to cycle and pedestrian facilities in the vicinity of the local area as well as Public Rights of Way are achievable and can be linked to improvements identified in the Crawley Walking and Cycling Infrastructure Improvement Plan.</p> <p>8.13. The Site can be designed to provide appropriate levels of on-site parking for both cars and Heavy Goods Vehicles to ensure that all demand can be accommodated on site.</p> <p>Gatwick Green – Access and Outline Transport Appraisal Note</p>

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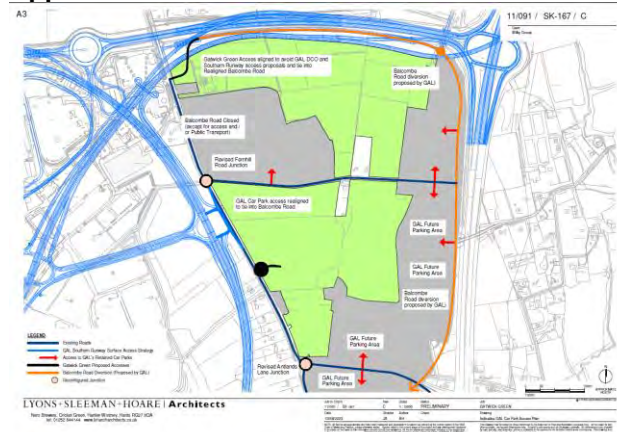
Appendix A – Figures



Chapter 9. Economic Growth

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Appendix B – Indicative GAL Car Park Access Plan



Appendix 3

Fulfilling the development management provisions

3.2 Strategic Policy EC4 also identifies the development management requirements that must be addressed at the planning application stage. This representation refers to a range of technical and environmental reports that provide sufficient policy-level evidence to demonstrate that Gatwick Green can be developed in a manner consistent with Strategic Policy EC4 and other DCBLP policies – the evidence comprises:

- 2020 Appendices1:
 - Environmental and Utilities Preliminary Assessment
 - Updated Preliminary Ecological Appraisal (PEA)
 - Hedgerow Regulations Assessment
 - Landscape Character and Visual Appraisal
 - Heritage Constraints Appraisal
- 2023 Appendices:
 - Addendum: Environmental & Utilities Report Appendix A
 - Preliminary Ecological Appraisal Appendix B
 - Addendum: Hedgerow Regulations Assessment Appendix C
 - Addendum: Landscape Character & Visual Appraisal Appendix D
 - Addendum: Heritage Constraints Appraisal Appendix E

3.3 Conceptual site planning for Gatwick Green is still at an early stage; it is anticipated that the development could comprise the following:

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			<ul style="list-style-type: none"> • A scheme of predominantly Use Class B8 with some Use Class B2 – storage and distribution and general industrial uses. • Ancillary / associated uses under Use Class E – office, business and services uses. • Supporting education uses for apprenticeships & staff training. • An amenity hub to provide support facilities for staff. • Incidental open spaces for use by the workforce and/or local residents. • An integrated green infrastructure framework – landscape, biodiversity, amenity space to address the objectives of the Biodiversity Opportunity Area and the requirement for Biodiversity Net Gain. • Sustainable mobility at the heart of the concept: <ul style="list-style-type: none"> ○ Two bus super hubs to facilitate modal switch and a high level of service for users. ○ A sustainable transport route through the site offering a high level of service for buses (notably the Fastway bus service), pedestrians and cyclists. • Ancillary car parking with Electric Vehicle Charging facilities. <p>3.4 A Development Framework Plan (DFP) is attached as Appendix 5 to TWG’s representation of Strategic Policy EC4. The DFP provides a high level framework for the future Masterplanning of the Site and shows indicative sustainable transport, green infrastructure and various environmental considerations that will influence the nature and extent of development in accordance with the various development management provisions in Strategic Policy EC4. A review of these provisions in the context of related technical and environmental evidence, is set out below which includes some preliminary findings on the types of measures that may be deployed to address the impacts of development at the Site.</p> <p>Sustainable Design and Construction</p> <p>3.10 Provisions j to m of Strategic Policy EC4 set out the requirements / guidance with regard to Sustainable Design and Construction for Gatwick Green. These require achieving BREEAM Excellent rating; Net Zero emissions and carbon neutrality by 2050; implementing an energy strategy under Policy SD2, and provision of surface water drainage so as to avoid increasing flood risk.</p> <p>3.11 The Environmental and Utilities Preliminary Assessment Report (EUPAR)² forms part of the 2020 Appendices and sets out the various design parameters for surface water drainage and flood prevention. The Site is located in Flood Zone 1 and the EUPAR sets out the approach, incorporating Sustainable Urban Drainage Systems (SuDS) and surface water attenuation arrangements that are Airport-compliant. An Addendum to the EUPAR has been prepared by Clarkebond (Appendix A), which contains a surface water and flood risk strategy that sets out the core drainage design principles and demonstrates that the various site and local hydrology/hydrogeology considerations can be satisfactorily addressed at the planning application stage.</p>

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			<p>3.12 Gatwick Green can be developed in a way that achieves sustainable drainage design and construction / operation and in accordance with specific policies in the DCBLP in respect of flood risk, drainage and sustainability³. These matters will be addressed at the planning application stage and set out in a sustainability assessment and FRA with obligations that can be guaranteed via planning conditions / a s106 agreement.</p> <p>Digital Technology</p> <p>3.13 Provision 'n' in Strategic Policy EC4 sets out the requirements / guidance with regard to Digital Technology for Gatwick Green. This requires the provision of high quality communications infrastructure including gigabit-capable full fibre broadband. As a new-generation storage and logistics development, Gatwick Green will incorporate future-proofed digital communications as indicated at Section 5.4.2.2 of the EUPAR and in accordance with Policy IN3 (Supporting High Quality Communications). This requirement will be addressed at the planning application stage and set out in a utilities report with obligations that can be guaranteed via planning conditions / a s106 agreement.</p> <p>Character and Design</p> <p>3.14 Provisions o to v of Strategic Policy EC4 set out the requirements / guidance with regard to Character and Design for Gatwick Green. These require that a range of environmental and design / amenity considerations are taken into account in the design and operation of the proposals for the Site. These include:</p> <ul style="list-style-type: none"> • A layout and design that respects the interface between the surrounding residences and countryside areas within the North East Crawley Rural Fringe landscape character area. • A design that is in compliance with the Aerodrome Safeguarding requirements⁴. • The inclusion of landscape buffers and public open space to address separation of Gatwick Green from Gatwick Airport, Horley and the wider countryside. • An exemplar standard of flexible design with a high quality public realm. • The integration of trees, hedgerows and biodiversity into the layout and design and enhance blue/green infrastructure in the context of the Gatwick Woods Biodiversity Opportunity Area. • Minimising the impacts of lighting on neighbouring residences. • Respecting the setting of Listed Buildings and Locally Listed Buildings, the integration of 'important' hedgerows and retaining a green buffer along Balcombe Road. <p>3.15 The environmental considerations relating to hedgerows and ecology, heritage and landscape / visual matters are addressed in the 2020 Appendices and subject to Addenda / a report contained at Appendices A - E. These confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.</p> <p>3.16 The specialist reports in the 2020 Appendices and the Addenda / new report at Appendices A - E contain a series of conclusions that confirm that the Site can be developed whilst respecting the various environmental</p>

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values in and around it, and include recommendations on appropriate avoidance and mitigation measures in the context of the specific policies in the DCBLP in respect of environmental protection and enhancement⁵. These matters will be addressed at the planning application stage and set out in a Design and Access Statement.

Appendix A - Addendum: Environmental & Utilities Report

clarkebond

Addendum to Environmental and Utilities Preliminary Assessment Report, Clarkebond, 26 February 2020: Surface Water Drainage, Foul Water Drainage and Air Quality

Gatwick Green



B05268-CLK-TN01

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TECHNICAL NOTE **B05268-CLK-XX-XX-TN-FH-0001**

Project: Gatwick Green

Date: 15/04/2021

Subject: Addendum to Environmental and Utilities Preliminary Assessment Report, Clarkebond, 26 February 2020
Surface Water Drainage, Foul Water Drainage and Air Quality

Technical Note Prepared by: *Toby Adair* Approved for Issue by: *Seymour D'Oyley*

Toby Adair Graduate Engineer - Hydrology Seymour D'Oyley Associate Director - Hydrology

Issue No. - Date	Status	Description of Amendments
15-04-2021	P1 - 52 Draft	
18-06-2021	P2 - 52 Final	Include changes from project team feedback.
22-06-2021	P3 - 52 Final	Minor changes from project team feedback.

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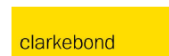
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The Wilky Group Ltd (TWG)

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TECHNICAL NOTE B05268-CLK-XX-XX-TN-FH-0001

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 Date: 15/04/2021
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 Surface Water Drainage, Foul Water Drainage and Air Quality

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 15/04/2021

1 Background

This is an Addendum to the report by Clarkebond entitled 'Environmental and Utilities Preliminary Assessment Report, Gatwick Green' dated 26 February 2020 (2020 report) on behalf of the Wilky Group (TWG). TWG has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area – a site known as Gatwick Green.

TWG owns about 47 ha (116 acres) of land east of Gatwick Airport as shown on the plan in **Appendix 1** (Gatwick Green / the Site). The Site is a proposed allocation as a Strategic Employment Location (SEL) in the draft Crawley Borough Local Plan, January 2021 (DCBLP) under Policy EC1 and Policy EC4 for an industrial-led


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			<p>scheme, predominantly for B8 use (strategic storage and distribution). The extent of the allocation for Gatwick Green is identified on the plan in Appendix 1 – it provides for a minimum of 24.1 ha of industrial development.</p> <p>The 2020 report provided a preliminary assessment of various environmental and infrastructure considerations pertaining to the proposed allocation of the Site for employment purposes. The 2020 report did not cover transport, biodiversity/ecology, heritage and landscape/visual considerations – these topics were addressed in separate reports. This Addendum provides an update to the 2020 report in response to the Site’s proposed allocation for employment development and in respect of certain infrastructure requirements where some additional assessment is needed to confirm the deliverability of Gatwick Green in this regard.</p> <p>The basis of this Addendum is the revised planning status of the Site under the DCBLP as compared to the policy framework in the January 2020 version of the Plan and what was being promoted by TWG at that time. Consequently, the following sections of 2020 report are no longer valid and are superseded by this report. The table below indicates the sections from the 2020 report that have been superseded and the replacement sections in this report.</p> <p><small>Table 1.1.1- Superseded sections of the 2020 report</small></p> <table border="1" data-bbox="703 762 1308 1129"> <thead> <tr> <th data-bbox="703 762 1003 810">2020 report sections - superseded</th> <th data-bbox="1003 762 1308 810">2021 report sections – replacements</th> </tr> </thead> <tbody> <tr> <td data-bbox="703 810 1003 863">1.1 Overview</td> <td data-bbox="1003 810 1308 863">2 Overview</td> </tr> <tr> <td data-bbox="703 863 1003 938">1.2 The Proposed Development/Concept</td> <td data-bbox="1003 863 1308 938">2.1 The Development Concept and the Draft Crawley Borough Council Local Plan</td> </tr> <tr> <td data-bbox="703 938 1003 991">2.0 Site Description and Land Use</td> <td data-bbox="1003 938 1308 991">2.2 Site Description and Land Use</td> </tr> <tr> <td data-bbox="703 991 1003 1066">2.2 Profile of the Proposed Development Concept for Gatwick Green</td> <td data-bbox="1003 991 1308 1066">2.3 Proposed Development Concept for Gatwick Green</td> </tr> <tr> <td data-bbox="703 1066 1003 1129">3.2 Submission Crawley Local Plan 2020 - 2035 (2019)</td> <td data-bbox="1003 1066 1308 1129">2.4 Draft Crawley Borough Local Plan 2021 - 2037 (January 2021)</td> </tr> </tbody> </table> <p>The other sections of the 2020 report remain valid – the data and assessments contained in these sections and related recommendations remain valid and part of TWG’s evidence base and that of the DCBLP.</p> <p>In addition to the above, this report provides supplementary assessments / information on the following matters:</p> <ul style="list-style-type: none"> • Sustainable surface water drainage considerations and opportunities (Sections 3 to 5). • Consideration of the capacity within the existing foul drainage network and infrastructure (including the Crawley sewage treatment) works to accommodate the current proposal being promoted by TWG with a near-term 2022-26 delivery timeframe (Section 6). 	2020 report sections - superseded	2021 report sections – replacements	1.1 Overview	2 Overview	1.2 The Proposed Development/Concept	2.1 The Development Concept and the Draft Crawley Borough Council Local Plan	2.0 Site Description and Land Use	2.2 Site Description and Land Use	2.2 Profile of the Proposed Development Concept for Gatwick Green	2.3 Proposed Development Concept for Gatwick Green	3.2 Submission Crawley Local Plan 2020 - 2035 (2019)	2.4 Draft Crawley Borough Local Plan 2021 - 2037 (January 2021)
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• An update on the Air Quality Assessment in the 2020 report based on the development being promoted by TWG now.

2 Overview

Gatwick Green is a proposal to develop a sustainable mixed-use development on land east of Gatwick Airport, as proposed by TWG.

2.1 The Development Concept and the Draft Crawley Borough Council Local Plan

The proposed Gatwick Green development is envisaged to be a comprehensive industrial-led development to deliver B8/B2 industrial / logistics / storage uses on land currently allocated for the comprehensive development of an industrial-led Strategic Employment Location in Strategic Policy EC4 – Strategic Employment Location of the latest Draft Crawley Borough Council Local Plan (DCBLP) 2021-2037. The targeted programme is based on a near-term 2022-26 delivery timeframe. **Figure 2.1.1** shows the proposed Development Framework Plan.



Figure 2.1.1: Proposed Development Framework Plan

2.2 Site Description and Land Use

The Proposed Gatwick Green Site is on predominantly undeveloped Greenfield land, located approximately 800m east of Gatwick Airport and at National Grid Reference (NGR) TQ 29992 41345. The area defined by the red-line plan that represents TWG land is shown in **Figure 2.2.1**, which is different from the red-line site boundary of the development layout in the 2020 report.

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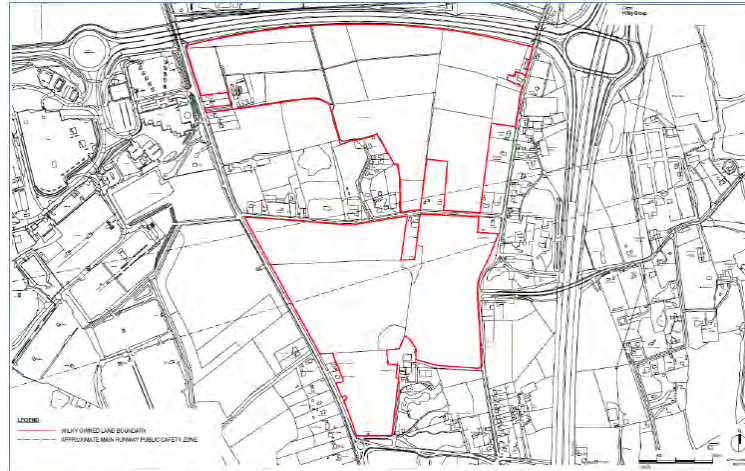


Figure 2.2.1: Red-line Plan Representing TWG land

Most of the Site is bounded to the west by Balcombe Road, beyond which is Gatwick Airport South Terminal Long Stay car park, Gatwick Airport train station and other Gatwick Airport support facilities. Gatwick Airport South Terminal is approximately 1000m west of the Site. The Gatwick Stream is located approximately 800m to the west and the Crawley Sewage Treatment Works is approximately 935m southwest of the southern boundary of the Site.

The northern boundary is the M23 spur road between junctions 9 and 9a. North of the spur road lies the residential area of Horley, with the Burstow Stream and further Greenfield land located to the north-east. The east of the Site is bounded by Peaks Brook Lane, beyond which are a mix of residences on larger plots and some small businesses. The M23 is approximately 180m to the east, and the south is bounded by further greenfield land. There are listed buildings on the proposed Site as well as in the local surrounding areas. The town of Crawley is approximately 3.5km south-west of the Site, the town of Horley is approximately 1.7km to the north-west, and the village of Cophorne is approximately 1.7km to the south-east.

The Site itself is mainly undeveloped agricultural land, which is roughly bisected by a minor road (Fernhill Road) near the centre.

2.3 Proposed Development Concept for Gatwick Green

The development profile is envisaged to comprise:

- A minimum of 24.1 ha of predominantly Use Class B8 with some Use Class B2 – storage and distribution and general industrial uses.

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Ref. No.	Respondent	Policy/ Para	Comments
			<ul style="list-style-type: none"> • Ancillary / incidental uses under Use Class E – office, business and services uses. • Supporting education uses for apprenticeships & staff training. • An integrated green infrastructure framework – landscape, biodiversity, amenity space to address the objectives of the Biodiversity Opportunity Area and the requirement for Biodiversity Net Gain. • Sustainable mobility at the heart of the concept: <ul style="list-style-type: none"> ▪ Two bus super hubs to facilitate modal switch and a high level of service for users. ▪ A sustainable transport route through the site offering a high level of service for buses (notably the Fastway bus service), pedestrians and cyclists. • Ancillary car parking with Electric Vehicle Charging facilities. <p>Refer to Site Plan and Developing Framework Plan in Appendix 1.</p> <p>2.4 Draft Crawley Borough Local Plan 2021 - 2037 (January 2021)</p> <p>2.4.1 Description of the shift in policy between the 2020 and 2021 Regulation 19 DCBLP</p> <p>The 2020 Regulation 19 DCBLP removed blanket safeguarding for the additional wide-spaced runway at Gatwick Airport, replacing it with a commitment to prepare an Area Action Plan (AAP) under Policy SD3 over the former safeguarded land and within which a temporary safeguarding arrangement was proposed. The AAP would be advanced via a separate Development Plan Document to address Crawley’s unmet needs for employment, housing and community uses alongside any legitimate long-term development needs of Gatwick Airport. Following advice from the Planning Inspectorate, the Council revised its strategy by reviewing the extent of safeguarding, that in turn allowed for the identification of a Strategic Employment Location at Gatwick Green. The 2021 Regulation 19 DCBLP therefore allocates Gatwick Green as an industrial-led development site under policies EC1 and EC4, with safeguarded land retained outside the allocation to accommodate an additional wide-spaced runway and associated airport infrastructure.</p> <p>2.4.2 Description of the new policy framework</p> <p>Gatwick Green is allocated as an industrial-led Strategic Employment Location for a minimum of 24.1 ha under policies EC1 and EC4. Policy EC4 makes provision, where evidenced, for additional industrial land beyond this amount. Limited complementary ancillary uses are provided for, such as offices and small-scale convenience retail and leisure facilities that would support the industrial-led function. Policy EC4 also sets out a range of development management provisions relating to transport and access, sustainable design and construction, digital technology and character and design, with further requirements related to the assessment of economic impacts and arrangements for delivery.</p> <p>These provisions establish the scope and nature of the associated infrastructure requirements and environmental considerations, which combined with other policies in the DCBLP, are designed to ensure that the site is developed in a sustainable manner.</p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>3 Sustainable Surface Water Drainage Opportunities</p> <p>3.1.1 Objectives This additional Section highlights the potential constraints and opportunities which need to be considered in assessing the suitability of the various sustainable drainage system (SuDS) techniques that could be implemented at the Site. It has been undertaken following the approach set out in the relevant standards and guidance (see Section 3.1.4) to inform the Development Framework Plan and the conceptual drainage strategy.</p> <p>3.1.2 Why it is Important to Consider SuDS Early SuDS are designed to reduce the potential impact of a development with respect to surface water drainage on both the development itself and the wider area. It also provides opportunities to remove pollutants from urban runoff at source, and combines water management with green space, with benefits for amenity, recreation and wildlife.</p> <p>To fully gain the benefits from a SuDS system it should be considered as early as possible in the design process so that it can be integrated into the master planning for a development to ensure drainage systems are effectively delivered. Consideration of the movement of water and its interaction with space is crucial to the success of SuDS and allows the designer and developer to maximise wider benefits and pre-empt or reduce the issues that could later arise that conflict with the ability of development proposals to incorporate SuDS.</p> <p>Development proposals progressed without undertaking this early stage risk the possibility that the proposed layout would not be capable of being drained in a sustainable way to meet national and local policy.</p> <p>When designed well, SuDS can increase property value, mitigate local flood risk, moderate microclimate, benefit ecology, provide new sources of water and create valuable amenity spaces for communities to enjoy.</p> <p>3.1.3 SuDS Policies, Best Practice Standards & Guidance The Flood and Water Management Act 2010 provides the legislative intention to require all new developments to incorporate SuDS. The National Planning Policy Framework (NPPF) is also a key driver, stating that development should give “priority to the use of sustainable drainage systems”. The NPPF also sets out key priorities for planning to address, including climate change, flood risk, water quality and biodiversity – all challenges that SuDS will help to address.</p> <p><u>Draft Crawley Borough Council Local Plan 2021 – 2037 (January 2021)</u> The key policies relating to SuDS within the Draft Crawley Borough Council Local Plan are: <i>Strategic Policy G11: Green Infrastructure</i> “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</p>

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			<p>designs to improve the visual amenity of the development, to account for Policy EP1 and to aid in reducing surface water run-off.”</p> <p><i>Policy EP1: Development and Flood Risk</i> “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 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.”</p> <p><u>Lead Local Flood Authority (LLFA) Guidance</u> “Water. People. Places – A guide for master planning sustainable drainage into developments”, prepared by AECOM for the Lead Local Flood Authorities of South East of England, complements existing guidance on SuDS design, maintenance and operation which should be used to inform detailed design and delivery of SuDS.</p> <p>The South East Lead Local Flood Authorities expect this guidance to be used as part of the initial planning and design process for all types of residential, commercial and industrial development. It has been developed through a partnership of South East Authorities and it intends to provide a consistent approach to best practice design of SuDS at the master planning stage. Specific local requirements for SuDS design and adoption may also be set by the Lead Local Flood Authorities.</p> <p><u>DEFRA Standards for Sustainable Drainage Systems</u> This document recommends peak flow and volume control of off-site discharge and the requirements of the drainage system to limit on-site flood risk.</p> <p>For previously developed sites, the 1 in 100-year runoff volume should be as close as reasonably practicable to the Greenfield runoff volume for the same event and should never exceed the runoff volume of the site prior to redevelopment nor adversely affect flood risk downstream.</p> <p>The runoff rates for the 1 in 1 year and 1 in 100-year rainfall events should also be as close as reasonably practicable to the Greenfield runoff rates for the same events and should never exceed the runoff rates of the present land use.</p> <p><u>Construction Industry Research and Information Association (CIRIA): The SuDS Manual (C753)</u> This publication covers the planning, design, construction and maintenance of Sustainable Drainage Systems (SuDS) to assist with their effective implementation within both new and existing developments. It looks at how to maximise amenity and biodiversity benefits, and deliver the key objectives of managing flood risk and water quality. There is also supporting information covering topics such as materials, landscape design, maintenance, community engagement and costs and benefits.</p>

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The guidance provides the framework for designing SuDS with confidence and to maximise benefits.

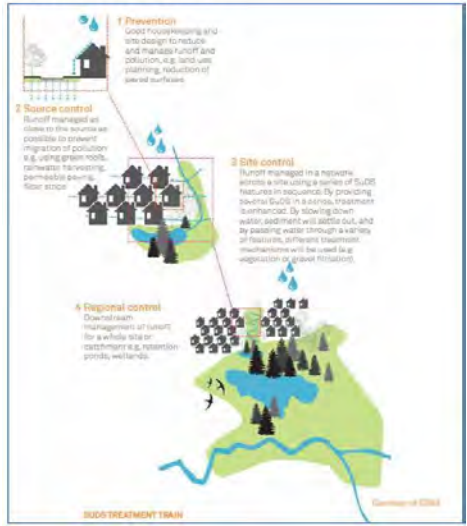
Building Regulations (2010) Hierarchy of Surface Water Discharge

The hierarchy of how surface water disposal should be managed is also discussed in Part H of the Building Regulations (2010) document. It highlights infiltration of surface water to groundwater using soakaways as the most sustainable and preferred drainage strategy. If this isn't feasible then the next consideration should be discharge of water directly into a surface water body, followed by discharge into a surface water sewer/other drainage system and finally discharge into a combined sewer. Where infiltration is not possible it is expected that attenuation techniques are adopted.

3.1.4 SuDS 'Treatment Train'

SuDS are not individual items, but rather an interconnected system where water slowly flows from where it falls to a soakage area or discharge point through a series of features that help to treat, store, re-use, convey and celebrate water. An important concept for the SuDS designer to follow is known as the 'treatment train'. By passing water through several stages of treatment, sediment and other pollutants will be removed more effectively, and maintenance costs are reduced as this minimises the risk of downstream SuDS features becoming clogged or blocked. The designer can use the treatment train to create green corridors and links, add opportunities for engagement and education and to match delivery of SuDS to phasing of development.

Figure 3.1.1: The SuDS Treatment Train



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3.1.5 Application of SuDS Guidance to Conceptual Site Development and Drainage Strategy
 Both the Site conceptual masterplan and drainage strategy have sought to follow these concepts and standards, considering the site-specific conditions and constraints as outlined in Section 4 and Section 5 of this report.

4 Assessment of Site Constraints
 Refer to the summary of results from the site constraints analysis in **Appendix 2**.

4.1.1 Possible Constraint from the Floodplain of Fluvial & Surface Water Sources
 There are no “main rivers” within the Site boundary.

The Site is in Flood Zone 1, which means that the risk of fluvial flooding at the Site is less than a 1 in 1000 year or 0.1% probability each year. This is the lowest classification of flood risk and therefore flooding from fluvial source is not a constraint to development at the Site or to the implementation of SuDS methods. The Environment Agency indicative flood risk map is shown in **Figure 4.1.1**.

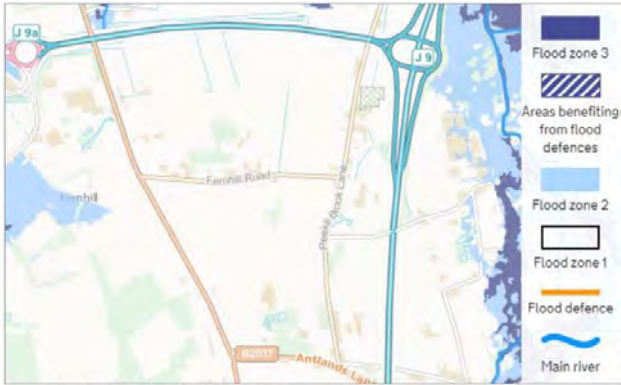
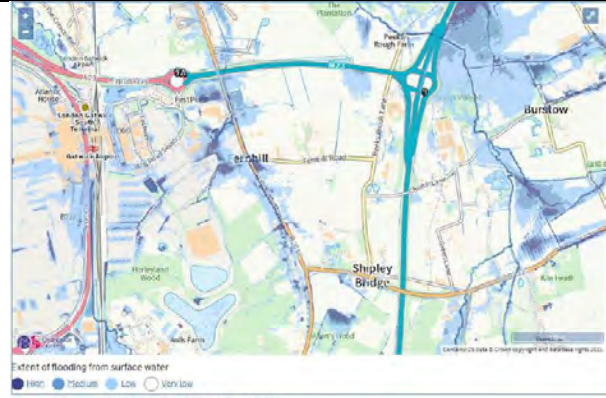


Figure 4.1.1: EA Flood Map for Planning

As can be seen from the EA surface water flood map (**Figure 4.1.2**), most of the Site is at very low risk of surface water flooding (i.e., less than 0.1% annual probability of occurrence). There are some pockets of low risk (0.1 – 1% annual probability), medium risk (1 – 3.3% annual probability) and high risk (>3.3% annual probability) on the west and north parts of the site – typically in topographically low areas and along the routes of existing minor ditches and drains.

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The proximity of the Site to Gatwick Airport means that there is a large impermeable surface area just to the west. There is a need for flood risk to be managed at Gatwick Airport particularly in times of heavy rainfall and balancing ponds are used to regulate the rate at which surface runoff is discharged into the River Mole and other watercourses, in accordance with the EA discharge requirements. This does not pose a risk of surface water flooding to Gatwick Green because the drainage catchment area for Gatwick Airport is toward the Gatwick Stream which flows in a north westerly direction away from the Gatwick Green site. Based on the above, the floodplains of fluvial and surface water sources do not pose any material restrictions to the implementation of SuDS at the Site.

4.1.2 Possible Constraint from Groundwater

The Site is not within a Groundwater Source Protection Zone (SPZ), and the nearest SPZ is located approximately 8km north. A review of historic borehole data from the BGS website states that groundwater was encountered as seepage at 0.80m depth at the north-west of the Site.

While this does not pose a risk of contamination to important water resources, care will need to be exercised in the consideration of infiltration-based SuDS methods due to the potential for a high water-table locally in some areas of the Site.

4.1.3 Possible Constraint from Soils & Geology

- Infiltration to ground is influenced by the following factors:
- Soil being free-draining and underlying strata having a suitable permeability;
 - The presence of important groundwater bodies (receiving water) which are vulnerable to contamination;
 - Presence of contaminants on site;

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			<ul style="list-style-type: none"> • Availability of adequate land space to satisfy BRE infiltration specification and design requirements. <p>A review of the Site geology from British Geological Survey (BGS) viewer indicates superficial deposits comprising River Terrace Deposits (undifferentiated) – i.e., sand and gravel underlying the north, east and south-east of the site. The bedrock geology comprises Weald Clay Formation with Mudstone underlying most of the Site, and Weald Clay Formation – i.e., clay-ironstone approximately east-west across the centre of the site.</p> <p>LandIS ‘Soilscapes’ data indicates that most of the Site falls within ‘Soilscape 22: i.e., loamy soils with naturally high groundwater’. The south-west of the Site is of ‘Soilscape 18: slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils.’ This is known to have impeded drainage.</p> <p>An appraisal of the geology would indicate that the ground conditions at the Site would not be able to facilitate certain types of infiltration drainage methods. However, this will need to be confirmed by BRE Digest 365 Soakaway Tests. This does not rule out the use of infiltration-based SuDS methods with liner and underdrain.</p> <p>4.1.4 Possible Constraint from Contaminated Land</p> <p>A Preliminary Risk Assessment was undertaken by Clarkebond for the 2020 report (refer to Section 4.5 – Land Contamination), which identified the following potential sources of contamination at the Site:</p> <ul style="list-style-type: none"> • A large above ground oil storage tank was observed to the north of Fernhill Lane. The integrity of the tank is unknown and therefore it may have leaked into the underlying soil. Several other, domestic size oil storage tanks were observed across the site. • Current land uses of contiguous and surrounding areas include metal merchants and light industrial works. Therefore, there is the potential of hydrocarbon impact from fuel oils/lubricant leakage from these existing land uses. • It’s possible that the Made Ground beneath the site might be contaminated by asbestos and other materials. • Areas of present and historical land use may have elevated levels of residual pesticides, herbicides and insecticides. <p>It was assessed that the general risk of significant contamination is low. The potential impact to the local environment should however be assessed in the future by appropriate analysis of the soils and groundwater together with a risk assessment based on the site-specific criteria.</p> <p>The above assessment does not limit the use of most SuDS methods; however, care will need to be exercised in the consideration of infiltration-based SuDS methods due to the potential low risk of contamination.</p> <p>4.1.5 Possible Constraint from Surface Runoff Features and Requirements</p> <p>There are minor watercourses and drains within the Site boundary which eventually discharge into the Burstow Stream north of the M23 spur road. It is therefore feasible for surface runoff from the proposed development to</p>

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			<p>be discharged at controlled rates into these receiving watercourses although some channel improvement works, and upgrades may be required.</p> <p><u>Discharge Requirements</u> In accordance with the NPPF and DEFRA guidance, development on existing Greenfield sites should restrict runoff to Greenfield rates to ensure the increased impermeable area as a result of development mitigates any impact on the downstream drainage network.</p> <p>The Draft Local Plan also requires the demonstration 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.</p> <p>The above conclusions do not limit the use of most SuDS methods at the Site, and it is recommended that the proposed drainage strategy restricts runoff post-development to current greenfield rates.</p> <p>4.1.6 Possible Constraint from Site Topography Topographic data was obtained from the LiDAR composite Digital Terrain Model (DTM), produced by the Environment Agency at a spatial resolution of 1m.</p> <p>The lowest ground levels are in the north-west adjacent to Balcombe Road, at approximately 57.1m AOD. The highest level is at the south-east at approximately 61.5m AOD. From the contours shown, natural gradients range from mild slopes to relatively flat areas. The topography also indicates that levels generally decrease towards the 'main rivers' north-west and north-east of the M23 spur road – both tributaries of the Burstow Stream. This also indicates the general direction of flow which surface runoff may take.</p> <p>The topographic review indicates that there is enough land gradient and depth of ground cover to suggest that drainage via gravity is achievable.</p> <p>4.1.7 Possible Constraint (Easement/Buffer Requirements etc.) from Existing Infrastructure <u>Foul and Surface Water Sewers</u> Asset records show that there are no existing surface water sewers on the Site. There are 2 separate public foul sewers on Peeks Brook Lane, which cross the Site and connect to the pump station located adjacent to the eastern boundary. The pump station discharges foul sewage, via a rising main, to the south western corner, near Rose Cottage. There will be easements for the sewers and rising main subject to confirmation with Thames Water.</p> <p><u>Power</u> The closest UK Power Networks grid substation (275kV to 132kV) is in Smallfield, 3km north-east of the Site. The HV cables from Smallfield run to the north of the Site boundary.</p>


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			<p>Multiple 33kV primary distribution cable routes cross the Site boundary in the north. 11kV underground and over-ground cables also cross the Site and are assumed to supply 4 HV'LV substations, where a low voltage (LV) network serves local properties via underground and over-ground service lines. LV underground cables and overhead lines are also present within the Site boundary.</p> <p>Any required excavation work would need to be away from installation, plant and cable routes to avoid damage. Easement and buffer areas will need to be confirmed with the power network provider, but these are not determined to pose any material constraints to the choice of SuDS methods that can be applied at the Site.</p> <p><u>Gas Network</u> Southern Gas Networks (SGN) owns and operates the gas main network in the area of the site. An 18" medium pressure main runs to the west and south of the Site. This is a significant piece of infrastructure which SuDS should avoid. A 125mm low pressure main is located along the existing east-west road that crosses the Site. Because these utilities are beneath a public highway, they are unlikely to be directly affected by the proposed development. Therefore, the local gas network should not affect the choice of SuDS at the Site.</p> <p><u>Water Supply</u> Distribution mains border the Site to the west and the east, running parallel with the B2036 and Peaks Brook Lane respectively, as well as along Fernhill Road. Multiple distribution mains extend away from the Site in the south-west, as well as west towards Gatwick Airport and North towards Horley.</p> <p>In conclusion the location of these utilities will not pose a material constraint to the use of most types of SuDS due to the availability of space that can be utilised.</p> <p>4.1.8 Space Constraints SuDS are often associated with large green spaces; however, there are a range of SuDS features which can be easily designed into tight urban settings. Design forethought is required to build SuDS into multi-functional spaces (such as incorporating them in as part of the public open space requirement) and build up a network of SuDS that manage runoff close to its source to avoid the need for large storage areas.</p> <p>The space available does not limit the types of SuDS that can be used. 'Land-hungry' SuDS methods are also feasible at the Site. Similarly, space efficient SuDS, such as green roofs, lined permeable paving, rills, rainwater harvesting, hardscape storage are equally viable.</p> <p>However, the proximity of Gatwick Airport and the associated flight paths limit the use of large areas of open water such as ponds and wet drainage basins as they can attract birds and pose a risk to aircraft through bird strikes. These types of SuDS features should therefore be avoided at the Site.</p>

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			<p>4.1.9 Possible Constraint from Protective Species or Habitat According to Defra's 'Magic Maps', the Site does not fall within an area designated as a protective habitat, including any grassland, heathland, inland rock, wetland or woodland. Therefore, this does not pose a constraint to the use of SuDS.</p> <p>The area falls within an area outlined as 'Priority Species for CS Targeting – Brown hairstreak (butterfly) and lapwing (bird)'. Although it does not fall within a protected area for any bird, mammal or plant species. Therefore, it is assessed that protective species and habitats will not pose a constraint to any SuDS considered for the Site.</p> <p>4.1.10 Possible Ownership & Maintenance Constraint Adoption discussions should be held early in the design process to ensure that SuDS are designed to the standards required by the adoption authority. Depending on the local provisions and context, the adopter could be the SuDS Approval Body (SAB) under the Flood and Water Management Act, a local authority, a highways authority, a landowner or a water company. Where adoption is uncertain, it is beneficial to ensure that design accommodates flexibility and favours simple solutions with low maintenance needs.</p> <p>SuDS features can be designed for adoption, ownership and maintenance therefore, this does not act as a constraint to the use of SuDS at the site.</p> <p>4.1.11 Recommended Sustainable Drainage Principles & Masterplan Considerations Based on the constraints identified, it is recommended to discharge surface water runoff by gravity to the local watercourses on and near the Site at a controlled greenfield runoff rate as the preferred strategy.</p> <p>There are additional "source and site control" SuDS measures that are recommended as suitable given the constraints identified and the land space available. Warehousing typically present a low pollutant hazard and uncontaminated runoff can then be directed to the local watercourses or infiltrate in a greenfield area. Key impermeable surfaces that will generate runoff should be distributed around the site.</p> <p>4.1.12 Additional Sustainable Drainage Principles The following additional techniques can also be considered if viable:</p> <p><u>Source control</u></p> <ul style="list-style-type: none"> • Green roofs & rainwater harvesting are both suitable for the large warehouse roofs • Landscaping (trees and planters) & bioretention areas could be utilised around the perimeter of the Site, which along with the green roof will promote integration of the development with its greenfield surroundings. • Underground storage, which can store filtered water from a bioretention area for redistribution around the Site. <p><u>Site control</u></p> <ul style="list-style-type: none"> • Lined permeable paving where HGVs access is not required. • Filter strips and swales which can be utilised around the perimeter of the Site to filter runoff and intercept potential runoff from off-site.

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			<p>Planters, wet woodlands, and trees can be an effective method of water storage and would provide amenity value and there is space available for landscaping within the Site layout.</p> <p>The use of surface water attenuation ponds & open wetlands is unlikely to be acceptable due to the risk of birds-strike at Gatwick Airport. Therefore, these types of SuDS are not proposed.</p> <p>Suggested Modifications:</p> <p>3.2 The Council's evidence on future employment land needs supports a provision above 13.73 ha, and this has been quantified in evidence by Savills that identifies a requirement of 69 ha based on an analysis of future market demand. This evidence reinforces the need for Strategic Policy EC4 to be amended to make it sound by the deletion of the minimum land provision for Gatwick Green. As a consequence, there is no justification for the need for 'appropriate evidence' to support any additional land above the minimum. <u>To make the policy sound, item (a) of the policy should be deleted.</u></p> <p>5.4 The <u>suggested change to the wording of Strategic Policy EC4 is as follows:</u></p> <p><i>"The Mobility and Access strategy is required to deliver a mitigation package that discourages or prevents HGV traffic on unsuitable roads and specifically restricts HGV movements through Horley."</i></p>
REP/056 (2023)	Gatwick Airport Limited	EC1 (v) and EC4	<p><u>EC1(v): Sustainable Economic Growth and EC4: Strategic Employment Location</u></p> <p>18. We objected to Policy EC1 of the 2020 Regulation 19 DCLP because it related to a proposal to bring forward a North Crawley Area Action Plan on land safeguarded for a second runway at Gatwick Airport (2020 Regulation 19 DCLP Policy SD3). Whilst the revised plan has removed Policy SD3, the revised economic growth strategy now provides for the allocation of an industrial-led Strategic Employment Location at Gatwick Green, on land east of Balcombe Road and south of the M23 spur. This is referred to at paragraph (v) of Policy EC1 with further detailed policy provision for this allocation at Policy EC4.</p> <p>19. We continue to object to this aspect of the economic growth strategy and therefore object to paragraph (v) of Policy EC1 and to Policy EC4 as a whole. The reasons for our objections are set out below.</p> <p>a) The allocation prejudices safeguarded land</p> <p>20. Gatwick Green is proposed to be constructed on land that remains safeguarded for the expansion of Gatwick Airport. This is protected under national policy and so is not available for the proposed development. The Government's draft Aviation Strategy "Aviation 2050 – The Future of UK Aviation" (December 2018) contains useful wording at paragraph 3.66 where it says <i>"It is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth"</i>. The Government's strategic framework for the aviation sector "Flightpath to the Future" (May 2022) reconfirms the Government is supportive of airports bringing forward expansion plans by way of its existing policy frameworks for airport planning and makes no recommendations to alter its policy to safeguard land at Gatwick Airport.</p>

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			<p>21. This position is recognised in the National Planning Policy Framework (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" (paragraph 106). The development of Gatwick Green for employment purposes would conflict with that safeguarding and the 2019 Gatwick Masterplan which remains supportive of and continues to safeguard land for an additional runway at Gatwick Airport (Section 5.4).</p> <p>22. The matter of safeguarding was addressed in the Inspector's Notes of the PINS advisory video conference (April 2020) in respect of land 'North of Crawley'. The Inspector concluded that the removal of safeguarding cannot be regarded as certain, there is no known timescale for its removal and that GAL continues to object to its removal. Consequently, the proposal to remove safeguarded land was, in that case, as a consequence considered "...unlikely to be effective". We consider that the circumstances which lead to that conclusion, also apply in this case. Furthermore, the Inspector's conclusion treats safeguarded land as a whole and does not give any support for parts of it to be eroded in a piecemeal fashion. These comments apply also to Policy ST4.</p> <p>b) The scale of the Strategic Employment Land location at Gatwick Green is not justified</p> <p>23. Gatwick Green was initially allocated as a 47ha site which should provide, "as a minimum", 24.1ha new industrial land, predominantly for B8 storage and distribution use to meet the perceived need identified in the borough. Any additional floorspace over the identified 24.1ha need would have to be justified through appropriate additional evidence.</p> <p>24. Policy EC4 now indicates that the Gatwick Green Strategic Employment Location should provide a minimum 13.73ha of 'new industrial land' based on the most recent Employment Land Assessment (Northern West Sussex Economic Growth Assessment Supplementary Update for Crawley 2023). We note the scale of the requirement is considerably reduced from the 24.1ha policy requirement in the 2021 draft plan. It is only c.57% of the previous requirement, nevertheless, the scale of the allocation on the proposals map remains the same at 47ha; a site area over 3.4 times larger than identified in the evidence base.</p> <p>25. The requirement for 13.73ha is based on the Experian forecasts of 638 additional jobs per year. The Northern West Sussex Economic Growth Assessment - Supplementary Update for Crawley (January 2023) acknowledges that these are 65% higher than the 413 jobs per year estimated by Oxford Economics (OE). The key difference between the forecasts is that Experian assumes that the recovery from the Covid pandemic would be complete by the end of 2022 whilst OE assumes it will not be until 2025 and that from 2026, the Crawley economy will grow by only 61 jobs per year.</p> <p>26. ONS local level employment data for 2022 is not yet out for Crawley, but across the country as a whole, the economy has yet to return to pre-pandemic levels. Given the importance of Gatwick Airport to the local economy, and that its 2022 passenger numbers were only at 70% of prepandemic levels, it is likely that Crawley is further behind the rest of the country. It is therefore more likely that the OE forecasts are correct and that employment</p>

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			<p>growth in Crawley will be significantly lower than in the Experian forecasts which are used as the basis of the forecast employment land requirement.</p> <p>27. If the OE forecasts are correct, then the level of employment in Crawley outside of the airport will barely increase over its 2019 baseline and the growth between 2022 and 2040 is in fact an artefact of the pandemic. This is illustrated by Figure 2.1 from the January 2023 Supplementary Update produced on behalf of Crawley Borough Council.</p>  <p>Source: OE (2022) / Lichfields Analysis</p> <p>28. It therefore follows that, far from being the minimum required, the 13.73ha requirement being used to justify allocating Gatwick Green is likely to be a significant over-estimate of what is needed.</p> <p>29. As the land is safeguarded by a national policy protection, we do not consider that there are any grounds for its removal from the Safeguarded Land at Gatwick Airport to provide a strategic employment allocation. Within this context, there is no justification within the evidence base for the removal of such a large area, even as an exception to the Safeguarded Land provisions, circumstances which we emphasise we do not consider to exist. The identified employment land need has reduced and so on that basis the scale of the allocation should also be reduced. It has not been and for some reason remains a rather oddly shaped allocation concurrent with the extent of the Wilky Group land ownership.</p> <p>30. Annex 1 to our previous representation examined the economic growth evidence base and drew 5 conclusions:</p>

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			<p>i. The allocation failed to properly protect safeguarded land;</p> <p>ii. The interpretation of the economic land forecasts were not reliable;</p> <p>iii. The size of the allocation was excessive to meet the identified need;</p> <p>iv. Crawley Council had failed to investigate and to understand the impact of the removal of the 47ha site from the safeguarded area on the implementation of the southern runway;</p> <p>v. The council had failed to look at alternative scenarios either elsewhere in the borough or through the duty to cooperate.</p> <p>31. We have reviewed the further employment land assessment produced in support of this version of the plan (Northern West Sussex Economic Growth Assessment - Supplementary Update for Crawley January 2023) and confirm that we consider our previous conclusions continue to remain valid (and indeed we return to some of them below).</p> <p>32. In addition, we also have concerns about the approach and conclusions of the latest study which we consider reduces the validity of its conclusions. These are:</p> <p>i. Reference is made to the 'ongoing' water neutrality issues in the borough (paragraph 1.3) in the preamble but is not otherwise taken into account in the assessment in the context of the rate of delivery of either housing or employment space. Whilst we acknowledge that the Gatwick Green allocation is not within the Sussex North Water Supply Zone, all of the major housing allocations are, as well as the majority of the remainder of the urban area and the proposed urban extensions to the town. This matter has had and will continue to have a significant impact on the timing and rate of development delivery over the next few years.</p> <p>ii. Reliance is placed on past trends but this ignores the interim impact of Brexit on the availability of workforce and the restrictions imposed through the Water Neutrality restrictions imposed by Natural England, both of which will impact on the rate of growth at the start of the plan period and so will reduce the reliability of an extrapolation of past trends. The latest Economic Growth Assessment gives no weight to these potential impacts.</p> <p>iii. There is some reliance placed on the delivery of urban extensions to Crawley which are to be brought forward in the emerging plans of neighbouring districts (i.e. Horsham and Mid Sussex). Neither of these plans have passed through examination. At Horsham, the Regulation 19 consultation has been delayed until later in 2023 at the request of the acting Leader and in Mid Sussex, the Regulation 18 consultation was undertaken at the end of 2022 with the intention for the Regulation 19 plan to be published by Autumn 2023. However, at the 2023 election, there was a change in administration of the Council but the impact of this change on local plan strategy and timing, if any, has yet to be announced.</p> <p>iv. The methodology for converting the employment growth figures under the Labour Demand assessment to a floorspace equivalent through the application of employment density assumptions, include an additional 10% to reflect typical market vacancy in employment (paragraph 2.28 of the report). Later in the report, under the heading 'Net to Gross Employment Requirements' the net floorspace requirements are converted gross</p>

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			<p>floorspace requirements by both floorspace and site area. Again, the methodology includes a 10% buffer or uplift as an allowance for such factors as delays in development sites coming forward, replacement of some ongoing losses of employment space and other relevant factors in the local market (paragraph 2.40). The floorspace/site calculations consequently include an uplift of 20% over the need identified by Experian.</p> <p>b) The allocation will prejudice the delivery of a full second runway</p> <p>33. The allocation of Gatwick Green is based upon a simple but ultimately uninformed assessment by the Council as to whether land illustratively shown in the 2019 Gatwick Airport Masterplan for long-stay surface parking produces an 'efficient' use of land (refer to supporting text paragraph 9.57 of the Regulation 19 CLP). This assumption was not based upon any discussions with GAL nor any detailed understanding of the land requirements to deliver a southern runway (the layout at Plan 20 in the 2019 Gatwick Airport Masterplan being purely indicative). The decision to make the allocation was made on the basis of an uninformed and incorrect assumption (at paragraph 9.57), driven in part by the Council's desire to secure an employment land allocation and its failure to cooperate with neighbouring authorities. Crawley Borough Council's view of the 'efficiency' of the currently intended use is not sufficient in itself to outweigh the safeguarding protection of the site under national strategy and policy.</p> <p>34. Arup have undertaken a more detailed review of the expected transport related impact of the allocation of Gatwick Green and the resulting reduction of Safeguarded Land for a second runway. Their report and findings are attached as Annex 2 to our letter of 29th June 2021.</p> <p>35. The Arup assessment demonstrated that the loss of the Gatwick Green safeguarded land would compromise details of the on-airport parking strategy and would also result in a substantial change from the second runway scheme in terms of access strategy, highway design, construction, and car park operation which has not been tested in the local plan evidence base. We consequently maintain our objections as set out in Annex 3 to our letter of 29th June 2021.</p> <p>c) There has been no assessment as to whether the employment land requirement could be met elsewhere</p> <p>36. The PINS advice note also states that with the safeguarding of land at North Crawley still in place, the Council should be proactively seeking to accommodate unmet economic needs in nearby authority areas through the Duty to Cooperate. The Duty to Cooperate remains a requirement. There is no evidence that the council undertook such action post the April 2020 pre-inquiry conference with the Planning Inspectorate and prior to allocating Gatwick Green.</p> <p>37. Similarly, there is no evidence that the Council investigated whether it was possible to meet the employment requirement by looking for other sites within the Borough or outside.</p>

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			<p>d) The Allocation cannot be accessed without severe detriment to highway network</p> <p>38. Arup have reviewed the transport modelling for Gatwick Green and set out their analysis and conclusions at Annex 3 to our letter of 29th June 2021. Their key areas of concern were:</p> <ul style="list-style-type: none"> (i) The quantum of Gatwick Green development assessed within the traffic model; (ii) The assumptions made between the proportion of B8 warehouse and B8 parcel distribution for Gatwick Green and their effect on the traffic generated; (iii) The lack of highway mitigation identified, with reference to (i) and (ii); (iv) No clear allowance for Gatwick Airport growth having been made. <p>39. We do not consider that these matters have been addressed in the current evidence base and so we maintain our objections as set out in Annex 3 to our letter of 29th June 2021.</p> <p>Conclusions</p> <p>40. The allocation of Gatwick Green is a reaction to the PINS advice following the pre-inquiry conference on 20 April 2020 on the unacceptability of the proposal to remove safeguarding for the North Crawley Action Area Plan. It is not an allocation informed by a comprehensive strategy review of how to meet employment requirements as part of boroughwide development strategy. There is no evidence that any analysis was undertaken to understand the impacts of that allocation on the airport or to investigate how the employment land requirement could have been met through alternative means.</p> <p>41. We consequently conclude that the Gatwick Green allocation is unsound on the basis that it:</p> <ul style="list-style-type: none"> (i) It has not been positively prepared. The strategy of meeting employment land needs at Gatwick Green has not been informed through either an appropriate understanding or evidence base of the impact of the allocation nor has there been any examination of whether the unmet employment space need could be accommodated elsewhere in the district or in other districts; (ii) It is not justified as the size of the allocation is too large and the need for scale of the employment land requirement is not proven. Additionally, the impact of the removal of Gatwick Green from the safeguarded area on the ability to implement a new runway at Gatwick has not been investigated or understood, and the transport modelling underestimates the potential highway impacts and fails to address the access impacts; (iii) It would not be effective given the removal of safeguarding cannot be regarded as certain, there is no known timescale for its removal and that GAL continues to object to its total or partial removal; and (iv) Would not respect national policy in respect of safeguarding land for airport expansion. <p>42. We request that this allocation is deleted from the draft plan and that further work is undertaken, including through the Duty to Cooperate, to examine whether the allocation can be met elsewhere.</p> <p>Suggested Modifications:</p>

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REP/058	Reigate & Banstead Council	EC4	<p>CBC's Local Plan for sustainable economic growth is based on the 2022 Experian Baseline Growth forecast of a minimum 113,390sqm (26.2ha) business land over the period to 2040. It is understood that this is reflected in the updated scenarios highlighted in the Northern West Sussex Economic Growth Assessment Supplementary Update for Crawley (January 2023). Using the Experian analysis and the updated scenarios, there is set to be sufficient land for office uses, but a shortfall for industrial. In addition to new office land coming forward in Crawley, the Horley Strategic Business Park site allocation (RBBC Development Management Plan Policy HOR9) will add to the sub-regional office offer. Therefore, it is known that Crawley's employment land requirements are mostly for industrial and in relation to B8 storage & distribution use.</p> <p>The constraints for employment land availability are understood to be heavily impacted by Gatwick Airport safeguarded land for a potential future southern runway. The land referred to as 'Gatwick Green' is promoted for employment use, located east of Gatwick Airport and the safeguarding of such land is not deemed to be appropriate for Gatwick's plans of surface car parking. CBC's Local Plan retains safeguarding but amends its boundary to exclude land to the east of Balcombe Road and south of the M23 spur for the Gatwick Green allocation, predominantly for B8 use class. The employment use is thought to address the industrial sector shortage which is not comprehensively catered for in the Manor Royal allocation (Policy EC3). It is also understood to complement the office-led provision provided by RBBC's Horley Business Park. Reigate and Banstead Borough Council support the reasons for the allocation in this regard.</p> <p>Strategic Policy EC4: Strategic Employment Location refers to the Gatwick Green scheme promoted to CBC by Savills on behalf of Wilky Group. The scheme shows two points of primary vehicular site access off Balcombe Road. As mentioned in our previous response, we strongly support the proposed restrictions on HGV's access/egress junctions at Gatwick Green. We very much welcome the additional wording in Policy EC4 criterion d. that states:</p> <p>"HGV traffic will not be allowed to enter Gatwick Green from the north on Balcombe Road, and will not be allowed to egress the site via a right turn onto Balcombe Road."</p> <p>This additional requirement will mitigate the adverse impacts on Balcombe Road, and therefore we feel it is found to be sound. We also welcome the new requirements set out in criteria e. and m., which further strengthen the policy.</p> <p>Suggested Modifications:</p>
REP/066 (2023)	Mid Sussex District Council	EC4	<p>Policy EC4: Strategic Employment Location</p> <p>In previous consultation responses, Mid Sussex raised concerns about the impact of this proposed allocation on the highway network. In June 2021, it was suggested that engagement with Mid Sussex would be helpful to enable a better understanding of the potential impacts however this has not been forthcoming.</p>

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			<p>It is noted that there has been an amendment to the policy, with the addition of Criterion (d) which seeks to restrict movement of HGV from the north, which means that access will be from the south with the potential to further exacerbate issues on the local road network in Mid Sussex as set out above.</p> <p>Therefore, the Council considers that the Policy requires further justification.</p> <p>Suggested Modifications: Changes required: Further evidence is required to demonstrate that the policy is justified by highways evidence. The Council is not satisfied that the cross-boundary impacts of the policy in Mid Sussex are fully supported by the transport evidence. Following an assessment of the impact of this proposed allocation the policy should be amended to make explicit any mitigation measures required to alleviate highways impacts in Mid Sussex District.</p>
REP/101 (2023)	Horley Town Council	EC4	<p>Horley Town Council response to Regulation 19 Consultation of the Crawley Borough Council Local Plan Horley Town Council (HTC) welcomes the opportunity to comment on the Draft Local Plan and has considered the proposed plan at their planning meetings.</p> <p>Our response focuses on Strategic Policy EC4: Strategic Employment Location which proposes land in the north east of Crawley, at Gatwick Green, to be allocated for delivery of a minimum of 13.73ha of new industrial land, predominantly for B8 storage and distribution uses.</p> <p>It is noted that this area is located right on the Crawley Borough Boundary, directly opposite the proposed Horley Business Park (within Reigate and Banstead Borough Council), separated by the Gatwick M23 spur road.</p> <p>As advised previously, the Horley Business Park is planned to have direct access to the M23 spur, however, we note that the Gatwick Green proposals (despite sitting adjacent to the spur road) would be accessed directly off of the Balcombe Road. As the site allocation is to comprise mainly warehousing it can be expected that the vehicle movements in and out of the site will be substantial.</p> <p>Horley Town Council wishes to continue to put on record its very real concerns on the potential impacts to the road network in Horley.</p> <p>HTC notes that the draft Policy EC4 (C) requires a Transport Assessment to demonstrate appropriate access of both employee and operational vehicular movements such that the proposals will not create a “severe” residual impact on the local and strategic road network. HTC queries the low benchmark Crawley Borough Council is setting for a development to not have “severe” residual impacts given that even a “moderate” residual impact on the local road network would result in an unacceptable increase in traffic within Horley and the local environs. HTC consider that a stricter benchmark should be applied not only to alleviate the potential for increased traffic on an already overstretched road network but also to encourage more sustainable modes of transport to be used.</p>

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			<p>As you may be aware the A23 is already under great pressure with increases in traffic from two major residential developments in Horley and HGV and operational vehicle movements associated with the North Gatwick Gateway warehouse site, as well as the consented warehouse development at the former Titan Travel site. In addition, there is the possibility that some site traffic will be allowed access to/from the Horley Business Park via the Balcombe Road and, most significantly the pressure on the local road network around Horley from both construction and operational vehicles associated with the proposed Gatwick Airport Northern Runway proposals.</p> <p>Local Road traffic flows is of such concern to us that Horley Town Council, and the neighbouring Salfords and Sidlow Parish Council, requested Surrey County Council to undertake highway surveys of the A23 from Three Arch Road to the Chequers Roundabout in 2022. The results from the survey work undertaken indicate that the A23 as it meets Horley has traffic flows that once they have built in the morning peak, remain busy throughout the day until they drop in volumes in the evening after the evening peak period. This is in contrast to many roads in Surrey which experience distinct peaks in the morning and evening, with lower flows during the interpeak period, signifying the importance of the A23 and the stretched capacity under which it is already operating.</p> <p>HTC note that Policy EC4 (D) seeks to prevent HGV traffic from accessing the Gatwick Green site from the north via the Balcombe Road and will not allow HGV movements to egress the site via a right-hand turn onto the Balcombe Road. This is considered positively by HTC, however, we remain unconvinced that HGV movements can be so strictly enforced to prevent vehicles alighting at, for example, M25 junction 8 and travelling through Reigate/ Redhill and Horley along the A23 and Balcombe Road to the Gatwick Green site.</p> <p>Furthermore, the policy only seeks to cover HGV movements and not employee or smaller servicing/ operational vehicles accessing the site. HTC request that, in the least, the policy is amended to restrict all vehicles (with the exception of emergency vehicles) from accessing or egressing the site to or from Horley along the Balcombe Road.</p> <p>It is disappointing given the sites proximity to the adjacent M23 Spur road that further investigations to provide a direct access cannot be assessed and incorporated in to the policy requirements within the Local Plan.</p> <p>HTC would question the current demand for warehouse and distribution units given the number of empty distribution units within the Horley area at the Gatwick Gateway site and the yet to be delivered consented proposals at the former Titan Travel site, both of which offer new commercial floorspace to the market. Albeit we do acknowledge that the intention is that Gatwick Green site will meet economic need towards the end of the plan period.</p> <p>As an aside, HTC also note that the draft Policy EC4 requires an Agricultural Land Classification Statement to be provided. However, we would question why a site is being allocated for Strategic Employment use if the Council haven't considered the agricultural land quality of the site. The NPPF requires at paragraph 174 that <i>"Planning Policies and decisions should contribute to and enhance the natural and local environment by:.....(b) recognising</i></p>

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			<p><i>the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland</i>". Given the Government's Food Security strategy HTC would expect that the quality of agricultural land be considered before it is allocated for alternative uses.</p> <p>To conclude, HTC strongly supports the draft policy requirement for an outline planning masterplan approach to the site which includes both phasing and the programming of infrastructure as part of an application. HTC consider this essential to the sites allocation to ensure that mitigation will be delivered in a timely and commensurate way.</p> <p>We trust our concerns will be taken into consideration.</p> <p>Suggested Modifications:</p>
REP/102 (2023)	Resident 37	EC4	<p>I object to this policy in every respect. I am 100% against the development of the land covered by this policy for the purposes described for a number of reasons.</p> <ol style="list-style-type: none"> 1. Traffic on the Balcombe Road. The only apparent road access to the site appears to be from the Balcombe Road itself. There is no direct access to the M23 or the airport extension road. The Balcombe Road is already extremely busy at peak hours and would be heavily overloaded should this development take place. Even Reigate and Banstead Council when proposing their business park on the other side of the Balcombe Road recognised this fact and limited access onto the Balcombe Road to "local traffic". 2. Lack of need for the development. The Government say there are more people in employment than ever before. Unemployment is extremely low and mostly in more disadvantaged parts of the country. Indeed we have a labour shortage. So the contention that huge amounts of employment are required locally is nonsense. No doubt you have a consultants' report justifying the allocation, but that is meaningless because consultants will say whatever you want them to. You only have to look at the uses on Manor Royal to see how the demand for industrial development has declined, so what can be the justification for allocating a whole new site for it now. If there is insufficient local employment, why is the council giving permission for more and more houses, including allowing the demolition of office blocks in the town centre to be replaced by flats? Building this development will only increase the demand for more housing. 3. There is mention of the proposed business park at Bayhorne Farm north of the airport approach road. This was included in the latest Reigate and Banstead Local Plan. However, this was a total failure. The partnership set up to develop the site is now moribund and there appears to be no interest by anyone in developing it. So all references to the business park are irrelevant. 4. The site of EC4 is currently safeguarded land for the expansion of Gatwick Airport. Indeed at the Reigate and Banstead Local Plan inquiry in 2018, Crawley Council argued that they were unable to provide sufficient

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			<p>employment land within Crawley because this land was safeguarded. Gatwick Airport are themselves doing a consultation about the expansion of the airport, which actually envisages the use of this land for airport purposes. So what the hell is going on?</p> <p>5. The site of EC4 has been in the ownership of developers for many years and they have been campaigning for its reallocation for a long time. They even had the cheek to make a pitch for its development at the Reigate and Banstead Local Plan inquiry when we were discussing the business park. It would be nice to think that no one in the council has any connection with the developers, even via pressure groups like the Gatwick Diamond, but I suppose that it just being naive.</p> <p>6. I note the utter cynicism of the council in allocating a site for unpopular development right up against their boundary with a neighbouring borough, leaving much of the detriment to be borne by people who do not elect them. I know that Reigate and Banstead did exactly the same thing with the business park, but that's not the fault of the poor sods who live here and have to put up with all the crap that you people throw at us. Just because we live near an airport and out with all the noise and disturbance from that, it doesn't mean that we lose all right to any consideration about the effect on our lives.</p> <p>Suggested Modification: Policy EC4 should be deleted.</p>
REP/113 (2023)	Natural England	EC4	<p>Strategic Policy EC4: Strategic Employment Location</p> <p>We support this policy's requirement j. regarding net zero emissions and carbon neutrality, in line with the aims of the NPPF (paragraphs 118. 148.) and goal 7 of the EIP.</p> <p>We also strongly support this policy's requirements. regarding the protection and enhancement of ancient woodland, trees and hedgerows in line with the aims of the NPPF (paragraphs 131. 174. 180.) and the goals and actions of the EIP, specifically point 3 of the delivery plan for goal 1. We would however suggest strengthening the wording of this requirement by removing the "where possible" clause. Additionally we also strongly support this policy's requirements s. with regards to the enhancement of green/blue infrastructure on the site, in line with the aims of the NPPF (paragraphs 20. 91. 150. 171. 181.) as well as the various goals and actions of the EIP relating to green infrastructure provision.</p> <p>Suggested Modifications:</p>
REP/151	Manor Royal BID	EC4	<p>This is the formal response of the Manor Royal Business Improvement District (BID) Company to Crawley Borough Council as part of the review of the Crawley Borough Local Plan that provides the planning and land use policies to help meet Crawley's employment land and floorspace needs for the period 2024 to 2040.</p> <p>The Manor Royal BID Company (MRBD Limited) was formed in June 2013 following the successful outcome of the BID ballot conducted in accordance with the Business Improvement Districts (BID) Regulations (2004), plus</p>

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			<p>two subsequent “renewal” ballots. The Manor Royal BID represents and promotes the interests of Manor Royal based companies and staff, with sole responsibility for managing and delivering the BID Business Plan for which businesses in Manor Royal have voted.</p> <p>This response predominantly focusses on “Economic” policies as they impact on Manor Royal. It is recognised that housing supply and supporting infrastructure are also important. On these issues the Manor Royal BID has produced and previously supplied a “Strategic Statement” and detailed comment on Gatwick Airport, extracts from which are provided as an Appendix.</p> <p>Commentary and Manor Royal BID response Economic Growth</p> <p>The policies and approach to promoting the Manor Royal Business District (Policies EC1, EC2 and EC3) are largely in line with previous policies and are designed to protect the prime function of Manor Royal. The Manor Royal BID supports this approach.</p> <p>The policies continue to protect and promote Manor Royal for B Use Class development (Offices, Industrial units and warehouses, para 9.9). Setting out a policy to encourage the promotion of a dedicated “business hub” (para 9.10) to help meet the long-known need for improved facilities to enhance the Manor Royal offer is also a positive step, whether that comes forward as part of a single development or as a series of smaller developments, provided that it does not undermine the area’s core function. Recognising the role the new Innovation Centre might play in fulfilling some of those “business hub” functions would be helpful, of which the Manor Royal BID is supportive.</p> <p>Explicit reference has been made to the Manor Royal Economic Impact Study (Lichfields, 2017), studies undertaken in respect of ReEnergise Manor Royal and the work of the Manor Royal BID itself. The Local Plan sets out how s106 contributions from developers will be sought to improve public realm and these will be allocated to projects identified jointly by the Council and the Manor Royal BID. This is a positive development and makes best use of local knowledge and the strategic work of the Manor Royal BID, specifically the Manor Royal Projects Pack. It is also encouraging to see the Council recognise the Manor Royal BID as a key partner in the development of Manor Royal Business District. On these points, the Manor Royal BID acknowledges and thanks the Council.</p> <p>In light of Manor Royal’s strategic importance and the intention of the Council to support development outside of the town (e.g. Horley Business Park) and promote a new Strategic Employment Location within the borough boundary (Gatwick Green, EC4), it is important that the Local Plan reflects the need to upgrade the Manor Royal offer, improve public realm, broadband capabilities, available onsite facilities, address transport issues and encourage supporting and complementary uses to help create a quality of place that encourages investment and</p>

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			<p>retains businesses. It is positive to see the Local Plan reflect these issues, which needs to be followed by swift action and tangible investment on the ground that the Manor Royal BID has proven it can help with.</p> <p>Strategic Employment Location (Policy EC4) The Manor Royal BID recognises the identified need to provide more employment floorspace that cannot be accommodated within existing locations. We acknowledge the “Gatwick Green” strategic employment allocation (Policy EC4) with a focus on larger scale B8 uses. The need to ensure this is brought forward in a way that is complementary and does not undermine Manor Royal’s strategic function as one of Crawley’s and the Gatwick Diamond’s key employment locations is mentioned in the plan. This is critical to ensure Gatwick Green meets a demand currently unmet, and not able to be met, by Manor Royal and to avoid displacement effects. Therefore;</p> <p><i><u>In providing an allocation to Gatwick Green as a strategic employment location, the Council should explicitly state that their preferred policy position is to support development, growth, intensification and appropriate extensions of existing employment areas like Manor Royal and that any other such developments will be subject to the requirement for an impact assessment justifying significant development outside the existing main employment areas with an assessment of how new development impacts existing areas, including but not limited to the impact Gatwick Green may have. This would be equivalent to a “town centre first” policy for places like Manor Royal. The Manor Royal BID feels this is the responsible and sustainable approach to guiding development that properly balances growth with protection of limited resources and the environment.</u></i></p> <p>Suggested Modifications:</p>
REP/055 (2023)	Gatwick Green (Wilky)	EC5	<p>Policy EC5: Employment and Skills Development</p> <p>1.0 Introduction</p> <p>Background</p> <p>1.4 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to Policy EC5 Employment and Skills Development in the Draft Crawley Borough Local Plan, 2023 (DCBLP).</p> <p>1.5 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by TWG/GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) (the Site) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p>

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			<p>Scope of representation</p> <p>1.6 This representation sets out the evidence in support of Policy EC5 reference to:</p> <ul style="list-style-type: none"> • The National Planning Policy Framework (NPPF, 2021). • The planning Practice Guidance (PPG). <p>2.0 Policy EC5</p> <p>Intention of the policy</p> <p>2.1 The purpose of Policy EC5 is to bring forward initiatives to improve the skills of the local workforce and training opportunities to raise educational attainment levels within the Borough. These are considered to be important to reduce the disparity between the educational levels and earning potential of the local workforce and those who commute into Crawley. These characteristics are reflected in Crawley's position near the bottom of the social mobility rankings as 304th out of 324 local authorities (DCBLP, para 9.65). The Council estimates that £49 million GVA per annum is lost from Crawley due to skills shortages in the local workforce. The Council has committed to reduce the skills gap to help Crawley to continue to attract inward investment (DCBLP, para 9.66).</p> <p>2.2 Policy EC5 has two parts. Part i requires all major developments at the application stage to prepare an Employment and Skills Plan to demonstrate how the construction and occupier (where known) phases of the development will support the initiatives identified in the Crawley Employment and Skills Programme. Part ii requires major developments to make a proportionate financial contribution towards employment and skills initiatives in Crawley.</p> <p>2.3 The Policy cross-refers to the Planning Obligations Annex (the Annex), which contains the basis for development contributions to ensure development within Crawley is served by, and helps provide, infrastructure of a suitable scale, quality and location so as to avoid harmful impacts. The Annex sets out the basis for planning obligations under various policies in the form of works or derived from contribution amounts based on formulas or generic approaches. This includes a formula for an employment and skills development financial contribution, which applies to all major residential and commercial developments so as to help improve social mobility, inclusion and address the existing skills gap.</p> <p>2.4 GGL supports Policy EC5 in principle, but considers that, in line with national planning policy and guidance, the Plan should acknowledge the scope for greater flexibility in its application with regard to major developments such as Gatwick Green.</p> <p>National planning policy and guidance</p> <p>2.5 Policy EC5 is considered to be in accordance with the policy and guidance contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The need to plan for and protect infrastructure features throughout the NPPF. With regard to infrastructure associated with strategic land</p>

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			<p>use policies, such as Strategic Policies EC1 and EC4, the NPPF requires such policies to make sufficient provision for, <i>inter alia</i>, infrastructure to serve strategic development: such infrastructure includes transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, the provision of minerals and energy (including heat), and community facilities (such as health, education and cultural infrastructure) (para 20). The NPPF requires joint working between strategic policy-making authorities and relevant bodies to determine where additional infrastructure is necessary (para 26).</p> <p>2.6 Local Plans should set out the contributions expected from development, including for 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 (para 34). Paragraphs 55 – 58 deal with planning obligations to bring about the delivery of infrastructure related to new development. The policy guidance states that planning authorities should use conditions on a planning permission where possible, or otherwise where a condition is not appropriate, use planning obligations. Where planning obligations must be secured, they must only be sought where they meet the tests set out in Regulation 122(2) of the Community Infrastructure Levy (CIL) Regulations 2010, i.e. they are 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.</p> <p>2.7 NPPF paragraph 58 goes on to confirm the importance of up-to-date policies that identify contributions expected from development – planning applications in accordance with such policies will be treated as being viable in line with the viability assessment of the Local Plan. The weight to be given to scheme-specific viability assessments at the application stage will depend on how up-to-date the Plan and related viability assessment are, and any changes in the circumstances of the site since the Plan was adopted.</p> <p>2.8 The importance of providing infrastructure features throughout the NPPF in relation to achieving sustainable development (para 8a); building a strong and competitive economy (para 82); promoting healthy and safe communities (para 92c); promoting sustainable transport (Section 9); supporting high quality communications (Section 10), and meeting the challenges of climate change (Section 14).</p> <p>2.9 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on planning obligations²⁰. PPG sets out guidance on the scope, nature and use of planning obligations under CIL or developer contributions. PPG states that policies for planning obligations should be set out in plans</p>

²⁰ <https://www.gov.uk/guidance/planning-obligations>

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			<p>and examined in public, and informed by evidence of infrastructure needs and a proportionate assessment of viability (Paragraph: 004 Reference ID: 23b-004-20190901).</p> <p>The need to retain flexibility in application</p> <p>2.10 PPG states that the evidence of need for infrastructure can be standardised or formulaic, and plan-makers should consider how needs and viability may differ between site typologies and may choose to set differential requirements. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. PPG also states that developers may be asked to provide contributions for infrastructure in several ways (Paragraph: 003 Reference ID: 23b-003-20190901), implying that there should be flexibility in how that is achieved, such as through planning obligations or contributions under CIL.</p> <p>2.11 PPG goes on to state that "...if a formulaic approach to developer contributions is adopted, the levy can be used to address the cumulative impact of infrastructure in an area, while planning obligations will be appropriate for funding a project that is directly related to that specific development". Whilst this guidance implies a binary approach to the funding and delivery of infrastructure, in reality the picture will be somewhat less clear. Some infrastructure 'projects' may be best provided by the Council utilising funding secured via development contributions, or could be better provided on-site via works. In the case of Gatwick Green, meeting the objectives of Policy EC5 are likely to be best achieved through the provision of an on-site education/training facility for apprenticeships or ongoing skills development. It is therefore important that Policy EC5 can be applied in a way that responds to specific circumstances; this could be achieved with some additional text that reflects the need for a flexible approach to the application of Policy EC5 in relation to major developments such as Gatwick Green.</p> <p>2.12 This flexibility could be included in the supporting text to Policy EC5 so as to inform its application in relation to major developments such as Gatwick Green. Aligned with the need for some flexibility, GGL has made representations to the Planning Obligations Annex seeking flexibility in how planning obligations are secured and delivered, and a change to reflect the approach to the application of Policy EC5 outlined in this representation in relation to major developments such as Gatwick Green.</p> <p>2.13 GGL supports the objectives behind Policy EC5, but considers that there is a need for more flexibility in the case where a development provides on-site employment and skills training capacity, that ought to be assessed as providing for skills training, in lieu of a contribution under Policy EC5 and the Annex (DCBLP page 278, item (ii)). For major developments, such a Gatwick Green, providing on-site skills and apprenticeship training facilities in the area of strategic logistics and advanced manufacturing would provide a suitable alternative way of delivering significant social and economic value to Crawley. Therefore, there should be flexibility on the application of Policy EC5, in combination with the Annex, to recognise that such value can equally be provided as works in lieu of a financial contribution.</p>

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			<p>Suggested Modifications:</p> <p>3.0 Proposed changes to Policy EC5</p> <p>3.1 It is considered that Policy EC5 provides an appropriate basis for securing reasonable and proportionate planning obligations in relation to employment and skills development from new development. It is therefore consistent with national policy and guidance on infrastructure and planning obligations, and so represents <u>sound guidance in the context of the tests at paragraph 35 of the NPPF.</u></p> <p>3.2 However, in order to acknowledge that the financial contribution towards employment and skills training in Crawley could equally be in the form of on-site skills training and education facilities, paragraphs 9.76 and 9.77 of the Plan should be amended as follows (additional text shown underlined):</p> <p>9.76 <i>A <u>planning obligation</u> or a developer contribution will be sought for all major residential and employment applications <u>to deliver employment and skills development in Crawley.</u> 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 <u>or obligations</u> will be agreed by the council and developer and secured through a S106 legal agreement.</i></p> <p>9.77 <i>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 Note⁸⁷. 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. <u>It is recognised however, that for some major developments it may be more appropriate for provision to meet part ii.) of the policy to be in the form of on-site education and skills training facilities to be funded by the development and its occupiers.</u> Both parts of Policy EC5 should be satisfied in accordance with the Planning Obligations Annex</i></p>
REP/044 (2023)	HX Properties Ltd. (Agent: Tim North Associates)	EC7	<p>Dear Sirs</p> <p>Crawley Borough Local Plan 2024 – 2040: Submission Consultation Draft May 2023</p> <p>My clients, HX Properties Ltd, raised representations objecting to Policy EC6 of the Regulation 18 and 19 versions of the same emerging Local Plan Review, concerned with “Hotel and Visitor Accommodation”, on the basis that the policy at the time was found to be unsound because it had not had regard to the implications surrounding airport related passenger car parking.</p> <p>Policy EC7 of the Crawley Borough Local Plan 2024-2040 Submission Consultation Draft May 2023 (hereinafter referred to as CBLP 2024-2040) is the latest iteration of earlier versions of the policy relating to “Hotel and Visitor Accommodation”. HX Properties Ltd object to Policy EC7 on the grounds that it is also unsound for the reasons</p>

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			<p>set out in these representations. These representations should be taken as superseding those submitted to your Council under Regulation 19 Consultation on 28th February 2020.</p> <p>The basis behind the earlier Regulation 18 & 19 versions of the same Local Plan Review was to provide a sequential test for hotel and visitor accommodation outside the town centre, whilst at the same time permitting the same uses on the Manor Royal Main Employment Area, where it could be demonstrated that the development caters specifically for the needs of Manor Royal. The earlier iterations of the same policy sought to restrict parking at new hotels and visitor accommodation to that solely in use for staff and guests in residence at the particular development, and not to be used for any other purpose, including long term off-airport car parking.</p> <p>At the time of the Regulation 19 Consultation, my clients agreed with the underlying purpose of what was then the first paragraph of Policy EC6 which relied upon the sequential test in accordance with the NPPG on <i>“Town Centres and Retail”</i>, where the underlying aim is to guide main town centre uses towards town centre locations first, and then if no town centre locations are available, to edge of centre locations and, if neither town centre locations or edge of centre locations are available, to out of centre location (with preference for accessible sites which are well connected to the town centre).</p> <p>Your Council accepts <i>“Hotel and Visitor Accommodation is identified in the NPPF as a main town centre use, and is subject to the sequential test”</i>, yet seeks to depart from the underlying purpose of the sequential test concerning <i>“Hotel and Visitor Accommodation”</i> in Policy EC7 of the CBLP 2024-2040. In this respect, despite recognising that <i>“... Crawley hotels also serve a particular airport-related function for passengers, air crew and other airport users”</i>; Policy EC7 proceeds to state that <i>“Gatwick Airport is considered to represent a sustainable location for visitor accommodation”</i>.¹ In my clients view, your Council has conflated the importance to be attached to the sequential test, a significant factor at the present time given the well published decline of town centres; and issues generally concerning sustainable development. If the two concept were the same, there would be no need for the sequential test.</p> <p>Put simply, if a demonstrable need is required for on-airport passenger car parking, the same must also apply to a mixed or composite use of hotel and airport related car parking, especially where one of the primary components of the same mixed or composite use, is airport related car parking. The contention advanced by my clients that on-airport hotels and visitor accommodation should be required to demonstrate a need before planning permission is granted, is given support through the wording of Policy EC7 : <i>“Car parking related to on-airport hotel development must meet the requirements of Policy GAT3”</i>.</p> <p>It is recognised that the Airport Owner and Operator enjoy permitted development rights in accordance with Schedule 2 Part 8 Class F of the Town & Country Planning (General Permitted Development) (England) Order 2015 (As Amended). However, as your officers will appreciate the phrase “operational building” is defined in Schedule 2 Part 8 Class O as meaning <i>“a building, other than a hotel, required in connection with the movement</i></p>

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			<p><i>or maintenance of aircraft or with the embarking, disembarking, loading, discharge or transport of passengers, livestock or goods at a relevant airport.</i>” In short, hotels do not benefit from permitted development rights, reinforcing the point that not only should the sequential test be applied in accordance with national advice, but similarly so too should a demonstrable needs test be required to be met in respect of on-airport hotel development as part of Policy EC7.</p> <p>These issues are particularly important in that it is understood that your Authority has altered its position from one where it was previously contended that airport related car parking at hotels and guest houses comprised an ancillary use which did not constitute development requiring planning permission. That position is no longer applied, rightly in my clients’ view.</p> <p>It has also been noted that the change in approach towards hotel and visitor accommodation on land at London Gatwick Airport has resulted in a change to the</p> <p>SA/SEA relating to Policy EC7. Option 2 of the SA/SEA relating to Policy EC7 concerns a policy approach of providing dedicated hotel and visitor accommodation through locally specific planning guidance for such uses, including in the town centre, Manor Royal and Gatwick Airport. The same option, it is said, ensures consistency with Policy GAT3, preventing the provision of airport-related parking in off-airport hotels and requiring on-airport hotels to comply with the requirements of Policy GAT3.</p> <p>What preferred Option 2 entails is that the most preferable location for hotel and visitor accommodation in terms of the sequential test, namely Crawley Town Centre, is to be regarded as an off-airport hotel site, where it meets the needs of passengers, air crew and others using the airport, at a time when the Government is seeking to encourage investment in town centres as a means of preventing their decline. Furthermore, where there is an absence of any qualifying conditions concerning on-airport hotels and visitor accommodation, can only mean that the same development is placed in a position of readily undermining the same uses in Crawley Town Centre, at the same time afforded preferential status to hotel provision on land at Manor Royal, where a demonstrable need is required to be shown on how the development will cater for the business needs of the Employment Area.</p> <p>In my clients’ opinion that approach simply cannot be right at a time when hotels in Crawley Town Centre are meeting the needs of passengers, airport crew and others using London Gatwick Airport. Indeed, far from re-invigorating the vitality and viability of Crawley Town Centre; the preferred option in terms of Policy EC7 has the propensity to hasten its decline. It is contended by HX Properties Ltd that this approach is misguided, being a direct result of your Council prioritising the need to prevent all airport related car parking outside the boundaries of London Gatwick Airport, from taking place, to the extent of discouraging a form of development which Government policy seeks to support in town centre locations.</p> <p>To compound the issue, recent developments granted planning permission by your Council for hotels on-airport have been allowed without any car parking. The requirement to meet on-airport car parking associated with on-</p>

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			<p>airport hotel development, in situations where no dedicated car parking is or will have been made available, will have a consequential impact on meeting other future on-airport car parking provision.</p> <p>In considering this matter, reference should be made to Application No. CR/2020/0707/NCC which was made pursuant to Section 73 of the Town & Country Planning Act 1990 (As Amended) and sought permission to allow the continued operation of the Hampton by Hilton Hotel, North Terminal, Gatwick Airport RH6 0PJ without complying with Condition No. 3 attached to the original planning permission Reference No. CR/2010/0692/FUL. Condition No. 3 attached to the earlier permission and the reason for its imposition are set out below:-</p> <p><i>"3. The hotel shall not be occupied until the parking spaces shown on the submitted plans have been provided and constructed. The areas of land so provided shall not thereafter be used for any purpose other than the parking of customers' vehicles."</i></p> <p>The reason for imposing this condition read as follows:-</p> <p><i>"To ensure that adequate and satisfactory provision is made for the accommodation of vehicles clear of the highways in accordance with Policy GC3 of the Crawley Borough Local Plan 2000."</i></p> <p>Interestingly, one of the factors advanced on behalf of Gatwick Airport Ltd to justify an absence of any dedicated car parking associated with the Hampton by Hilton Hotel, a consideration which was accepted by your Council, read as follow:-</p> <p><i>"The Hilton by Hampton Hotel would not be alone in not having any designated parking. The 245-bedroom bloc hotel at South Terminal (permitted in 2012) has no parking, nor has any parking been required as part of a recent (2019) permission for its extension. The 46-room "Yotel" at South Terminal similarly has no car parking."</i> (my emphasis)</p> <p>It can be seen that the proposition that hotel development on-airport is required to have its own on-airport parking for guests has simply not been adhered to by your Authority. On the contrary, by allowing no dedicated car parking in associated with on-airport hotels is simply a recipe for exacerbating problems relating to on-airport parking supply generally. This is particularly the case where as a consequence of the Hampton by Hilton Hotel having no dedicated car parking, and due to GAL's intention to redevelop what was Car Park M, including the area used for parking by Hampton by Hilton Hotel, its provision was subsequently decanted into Multi Storey Car Park 7 where some 60 spaces were intended to be made available for its use.</p> <p>The approach adopted by your Council towards car parking provision associated with off-airport hotels is contrary to the reasoned justification set out in paragraph 9.89 of the CBLP 2024-2040 where it is concerned with Policy EC7, viz:</p>

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			<p><i>"9.9 Hotels are an NPPF main town centre use, and support Town Centre's 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."</i></p> <p>In SA/SEA terms, two further options should have been explored in terms of Policy EC7 with regard to hotel and visitor accommodation. The first of these two additional options is where preferential treatment in terms of location for hotel and visitor accommodation is provided in Crawley Town Centre in accordance with the sequential test, and in Manor Royal, but only where it can be demonstrated that the scale and function of hotel and visitor accommodation would not undermine the established business role of Manor Royal. The second of these two further options is to permit hotel and visitor accommodation on-airport, where a demonstrable need can be shown to exist for such use, and where there are no more sequentially preferable locations available.</p> <p>Policy EC7 is however unsound for other reasons, in that it seeks to permit hotels and visitor accommodation on land at Manor Royal, subject to it catering for the business needs of the same employment area, and being used solely for staff and guests in residence of the development. Policy EC3 is specifically concerned with Manor Royal, with the reasoned justification set out at paragraph 9.47 outlining those complementary business facilities and staff amenities needed to support the day-to-day requirements</p> <p>within the employment area, with no account taken of hotel or visitor accommodation. In this way the two policies are incompatible in respect of the significance afforded to hotel and visitor accommodation.</p> <p>Policy EC7 fails to take into account that there many hotels in the vicinity of London Gatwick Airport which use their car parks as a temporary drop off facility in connection with a long term off-airport car parking provider, where cars are moved to an alternative location, whether on or off-airport, pending the customers return to the hotel from a holiday or business trip.</p> <p>The Car Parking Management Plan relating to a proposal to construct extensions and convert areas of the existing Ibis Gatwick Hotel, London Road, Northgate, Crawley West Sussex to create 57 additional rooms, resulted in a reduction in car parking spaces on the same land from 73 to 33. This was accepted by your authority, and is an example of the measures taken by a hotel in order to avoid a material change of use occurring, from a primary use as a hotel to a mixed or composite use as a hotel and for long term off-airport car parking purposes (Crawley Borough Council Ref No CR/2016/0580/ FUL refers).</p> <p>The approved Car Parking Management Plan is simply one example which has unintended consequences, in that hotel guests are provided with a number of choices of how to ensure that their vehicle is not left at the Ibis Gatwick Hotel during their leisure or business trip, being kept elsewhere, either at an on or off-airport parking site. This approach clearly has obvious benefits to the Ibis Gatwick Hotel in terms of an increase in the number</p>

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			<p>of rooms and hence revenue stream, at the same time intensifying reliance and therefore need for all kinds of on and off-airport car parking facilities able to cater for the hotel's car parking requirements.</p> <p>Schemes of this nature also have a consequential impact on future supply considerations for various types of on and off-airport car parking, with associated implications when considering public transport modal share requirements in the context of the May 2022 Section 106 Legal Agreement, and October 2022 ASAS. In the case of Gatwick Airport Ltd, they also benefit from this process in the event that the car is parked on-airport.</p> <p>In circumstances where hotel guests are prevented from leaving their vehicle at the particular hotel for the duration of their leisure or business trip in order to avoid a material change of use occurring involving long term passenger related car parking, has itself unintended consequences. It means that additional trips are involved transporting the passenger's car to an alternative location which may be either on or off-airport during the passenger's trip, before their vehicle is returned to the hotel awaiting their arrival. In my clients' view this process also has the propensity to exacerbate unauthorised long term off-airport car parking, of no benefit to the Council or operators of lawful long term off-airport car parking sites.</p> <p>In previous appeal decisions regarding long term off-airport car parking, your Authority has accepted that unauthorised car parking provides a constituent part of airport related passenger parking supply which is likely to continue into the future.</p> <p>For the reasons contained in these representations Policy EC7 is considered unsound; is inconsistent with Policy GAT3 and has implications for airport related car parking generally from a wider sustainability perspective, especially where it concerns hotel and visitor accommodation.</p> <p>Suggested Modifications:</p>
REP/056 (2023)	Gatwick Airport Limited	EC7	<p>EC7: Visitor Accommodation</p> <p>47. We objected to Policy EC6 in 2020 Regulation 19 DCLP. In 2021 we supported the alterations to the policy (renumbered EC7) which specifically excluded applications for hotel development at Gatwick from the need to apply the sequential test.</p> <p>48. We note that the 2023 draft plan further strengthens Gatwick as a preferred location for hotel development and we support this change.</p> <p>Suggested Modifications:</p>
REP/151	Manor Royal BID	EC9	<p>Supporting the Creative industries (Policy EC9): This policy makes reference to the need for better provision in support of creative industries, including the need to enhance the supply and range of employment floorspace for start-ups, incubation and grow-on space throughout the Borough. Further, the Economic Growth Assessment (EGA) finds that Crawley performs poorly in terms of new business start-ups (para 101). Reference is also made</p>

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			<p>to the role of the Innovation in terms of providing “grow-on” space for hi-tech small businesses (SMEs). The Manor Royal BID would argue that this is, at least in part, due to the lack of provision of smaller business space generally (sub 3,000 sqft) particularly smaller industrial and workshop space, similar to that provided by the Council at The Enterprise Court. This lack of affordable small business space limits the ability for small businesses to start and grow in Crawley where recent development trends of private developers favours larger scale industrial, warehouse and logistics facilities. An issue identified repeatedly by the Manor Royal BID, including in its Economic Impact Study (2017). The Innovation Centre will, to a degree, help a certain type of business, however, it is not by itself a solution. This is likely to continue to be a gap impacting companies of all types beyond creative or hi-tech industries. <u>The Manor Royal BID acknowledges the need for smaller business space. However, it encourages the Council to be more specific about the gap in terms of size and type of provision, to recognise that gap exists in Manor Royal and that it impacts on businesses beyond the Creative and Hi-Tech Industries. While the BID supports the promotion, attraction and growth of these specialist companies throughout Crawley the Local Plan should acknowledge the need that exists beyond these niche sectors in support of local entrepreneurs and start-ups and be more specific about how it might encourage these uses to come forward.</u></p> <p>Suggested Modifications:</p>
REP/151	Manor Royal BID	EC11	<p>Employment Development and Amenity Sensitive Uses (Policy EC11): This policy concerns the Buffer Zones at Manor Royal and Forge Wood where employment uses will be permitted, provided they do not adversely impact upon the amenity, function and setting of nearby residential uses. <u>The Manor Royal BID understands why this policy exists but feels the definition is vague in terms of what the Council deems to be “adverse” thereby making it difficult for businesses and residents to understand what uses might be deemed acceptable. This policy would benefit from more definition and clarity.</u></p> <p>Suggested Modifications:</p>
REP/151	Manor Royal BID	Other matters	<p>Other matters</p> <p>Release of land to the north of Manor Royal: A previous iteration of the Local Plan proposed an Area Action Plan to explore options to release land in the retained safeguarded area for development and to allow extensions to Manor Royal at its northern boundary, something the Manor Royal BID continues to be supportive of. On advice the Council has removed this intention and retained the safeguarded status until which point Government policy triggers a review. <u>The Manor Royal BID supports a review of the safeguarded land at the earliest opportunity subject to Government policy. If this land were to be released, the Manor Royal BID is unclear whether there is sufficient demand to accommodate both the Horley Business Park and the development of another strategic employment location. If not, the Council should consider which of these sites it prefers and be clear on its position to avoid simultaneously promoting both sites and undermining existing locations, including</u></p>

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			<p><i>Manor Royal. Therefore, the Local Plan should be clear whether its support of Horley Business Park and other sites outside the main employment areas is contingent on development to the north of Manor Royal.</i></p> <p>Manor Royal Supplementary Design Guides (SPGs): These supplementary design guides covering design and public realm in Manor Royal were produced as part of the Masterplanning process of 2010. Since then many changes have taken place, including; the production of three Manor Royal Project Packs, the Manor Royal Sustainability Action Plan and plans for a Manor Royal Biodiversity Net Gain Plan. More generally there is increased awareness now of new environmental standards, including energy, biodiversity and water efficiency. Therefore; <i>The Manor Royal BID asks that consideration is given to reviewing and refreshing the Manor Royal Supplementary Design Guides to ensure they are still relevant.</i></p> <p>Broadband capability: The Council has produced its own vision statement for Manor Royal to be “the south east’s leading digitally enabled and mixed use innovative business park, attracting sustained business investment that will deliver high value employment and higher levels of productivity and economic growth”. While this is not a vision the BID recognises it does not object to it. However, to achieve it sufficient high-speed broadband capability to all buildings and for all businesses must be available. This was identified as part of the Manor Royal BID’s previous Business Plan (2018-23) and again in the current Business Plan (2023-28). Limited progress has been made in satisfying this need and future proofing Manor Royal in this way, which undermines the Council’s vision. Therefore: <i>The Manor Royal BID has experience of working on projects to improve broadband speeds throughout the Business District and urges the Council to commit to making the necessary improvements during the very earliest phases of the plan period to avoid the attractiveness of Manor Royal to the high-tech companies the Council wishes to attract being undermined.</i></p> <p>APPENDIX A: Extracts from the Manor Royal BID Strategic Statement as they relate to housing and infrastructure.</p> <p>Transport and parking The ease of moving people, goods and services is a major consideration of any area and particularly for an area as significant as Manor Royal with so many businesses and people attracted to and using it. Congestion, particularly at peak times, is something that needs to be managed. MRBD supports initiatives that assist businesses in encouraging their staff to make use of alternatives to making single occupancy car journeys while recognising that travelling by car is popular and for some necessary.</p> <p>MRBD supports strategic partners who are active in encouraging and promoting better connections and increased capacity particularly by rail and road, including bus infrastructure and improving key stations and the way users can easily use these stations to move from one mode of transport to another i.e. rail to bus.</p>

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			<p>The availability of sufficient parking for car users is an issue for some where parking problems can impact on the attractiveness of the area as a place to work and can be problematic for visitors and customers, particularly those businesses that are customer facing or retail in nature.</p> <p>Manor Royal used to benefit from areas dedicated to car parking. These have now been developed. For some parking remains problematic. Consideration of how new development impacts on trip generation and congestion is important and MRBD would welcome consideration of options to ease parking pressures. This could include some form of park and ride or the creation of a communal on-site parking facility / transport interchange or hub with ease of access to and from it.</p> <p>The proper enforcement of traffic orders and restrictions is important for the continued free flowing, safe use and attractiveness of Manor Royal. Extensive work by the BID, including feedback and engagement with businesses, highlights the inadequate enforcement arrangements currently in place and Traffic Regulation Orders (TROs) in much need of review and revision. It is important this is acted on and the solution is sensitive to the needs of the area and the people expected to use it.</p> <p>The condition of roads, pavements and cycleways is important for their safe use, the perception of the area and for encouraging people to cycle and walk. However, the condition of these around the Business District is variable and in need of improving and upgrading. This includes upgrading of surfaces, safe separation of different users, and in some places the clarity of road markings signage and lighting. Improvements to the public realm should also be prioritised and supported for the benefits this can have in encouraging active travel as well as the much needed upgrade of the overall appearance, look and feel of the Business District.</p> <p>Housing and labour, including skills</p> <p>Tight labour market conditions and access to people with higher level skills are sometimes cited as problems for local firms generally. Action therefore is needed in this area for which MRBD is an advocate. It will participate where it can to influence delivery and policy and recognises that housing delivery (in terms of quantity and quality / mix) to ensure housing growth meets economic growth and is matched to the aspirations of the Business District.</p> <p>Housing supply, good transport infrastructure, labour supply and the economic growth of the area are inter-related and must go hand in hand. Where this does not happen this could lead to increased difficulty with recruitment, increased labour costs and/or business frustration – aspects of “over heating”. MRBD would be concerned where proper consideration is not given to these factors and development of any kind is promoted that leads to a worsening of this situation either in or around Manor Royal.</p> <p>APPENDIX B: Text from Manor Royal BID response to the Gatwick Masterplan consultation (December 2018)</p>

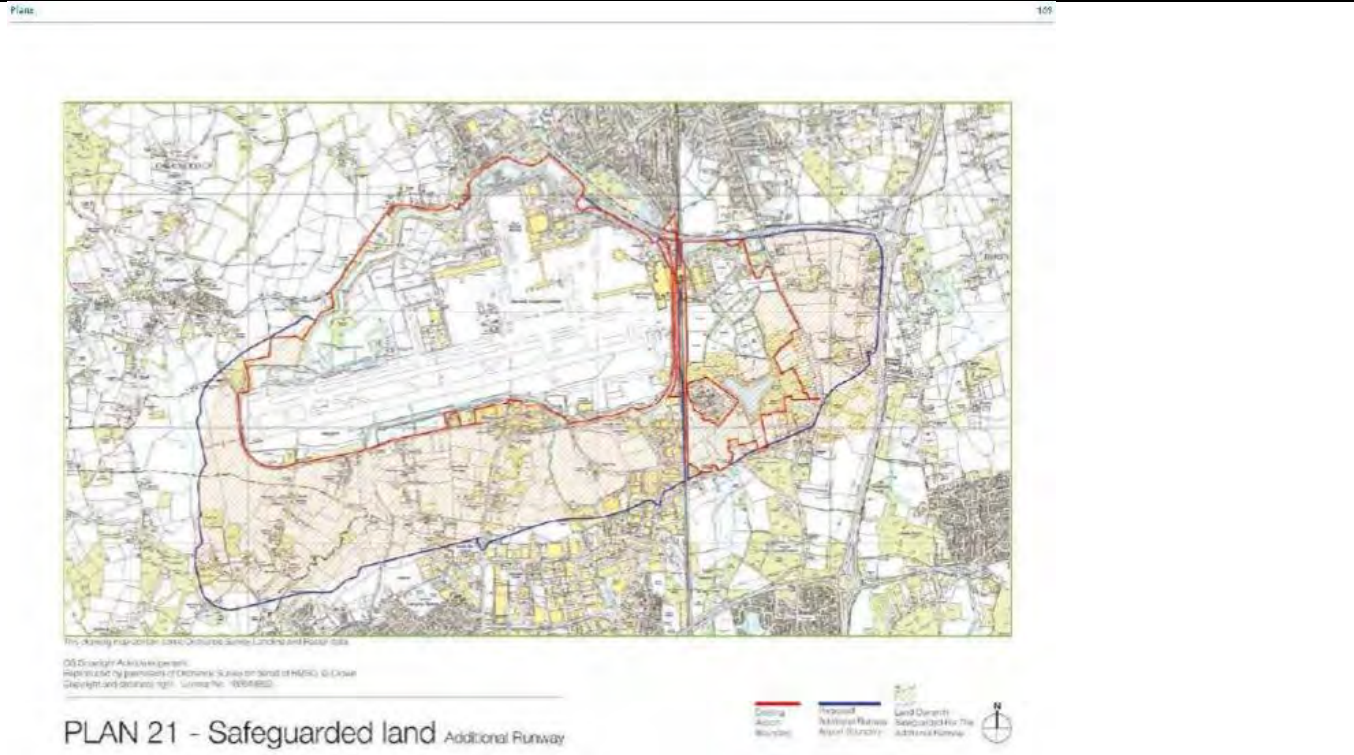
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			<p>MRBD recognises the benefits of an expanded Gatwick Airport. MRBD remains supportive of proposals that support growth. Plans to improve the efficient use of the existing runway (Option 1) are sensible and supported.</p> <p>Plans to bring into more active use the emergency runway to further meet the increasing demand for air travel (Option 2), while not increasing the actual footprint of the airport, are also sensible provided safety is not compromised and due consideration is given to the impact this may have on the surrounding area, particularly in terms of congestion and secondary issues related to commuters and passengers parking in surrounding areas. On this point we are not entirely convinced that sufficient measures have been taken to mitigate these impacts and believe there is a case for GAL to work more closely with the local authorities to invest in the local infrastructure.</p> <p>Our primary concern for Gatwick Airport to grow to circa 70mppa is whether the local infrastructure can cope with that level of use and that our area does not invite similar pressures, problems and criticisms experienced at Heathrow Airport.</p> <p>It is also noted that growth of this order would bring new opportunities, which we would be enthusiastic about promoting to Manor Royal based businesses. It would also bring new challenges. The availability of land to accommodate new commercial space and housing development is already highly constrained. Even without the introduction of a second runway we would encourage the Airport to work positively with the local planning authorities to find ways this might be remedied so that the Airport's growth can be accommodated successfully and not at the expense of other businesses and the area generally.</p> <p>A bigger Gatwick is also predicted to generate an uplift in demand for workers. Again, while this is an opportunity it is also a challenge in an area with practically zero unemployment where companies already struggle to recruit. This must be taken account of to avoid significantly increasing this pressure and causing companies to suffer from the impact of further wage inflation and other problems caused by not being able to fill positions and having to widen their area of search, which itself has the twin impact of creating an upward pressure on wages and to encourage further in-commuting.</p> <p>On this point we would encourage GAL to look at ways they can help promote and support opportunities for people to work in the area generally and not just to focus on those opportunities available at the airport itself. This would require the airport to take a broader "place based" approach to promoting the economic area of which it is a part.</p> <p>A call for closer partnership working</p> <p>Since the change in ownership of the airport there have been notable improvements in the airport itself and the supporting infrastructure. This has benefitted the airport and the surrounding area and is reflected in above</p>

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			<p>target increases in passenger numbers. As the airport grows it is important it maintains good relations with the surrounding businesses and residents.</p> <p>We would welcome the input of Gatwick Airport into the plans of the Manor Royal BID, as voted by the Manor Royal businesses in the BID Renewal Ballot, so that we can ensure an active and harmonious relationship between the two areas. It is the efficient function of both these areas and their healthy co-existence that is key to the continued success of the local economy. This could also lead to more positive relationships being built between the two areas that could lead to a better understanding, more reciprocal trade and the possibility of shared projects with the potential for much better outcomes.</p> <p>Pressure on infrastructure and the ability to innovate</p> <p>The consequences of growth in terms of the pressure on the local infrastructure is something that is felt and shared by all. It is important that Gatwick Airport is an active partner working with the local residents, businesses and their representative groups alongside the local authorities to manage these consequences.</p> <p>This should include proactive ways to engage with and invest in solutions to encourage modal shift (e.g. by working with Metrobus to help them to continually improve their service both in terms of innovation and frequency), to help to manage areas in the immediately vicinity to control parking (e.g. by working with local authorities and possibly investing in local off-airport parking service teams) and looking at ways that Gatwick Airport can work with groups like the Manor Royal BID to understand its pressures and help to deliver, in partnership with the local authorities, improvements to the road, walking and cycling infrastructure.</p> <p>Gatwick Airport could also be a significant partner in sharing its expertise with Manor Royal BID and local partners to help us to jointly innovate and embrace new ideas for improving sustainable travel behaviour (e.g. by sharing their experience of introducing electric vehicle car sharing schemes and being a champion for their introduction in nearby areas). Gatwick Airport could also share its technology experience on how data could be used to better inform travel decisions by people accessing the airport and travelling around the area generally.</p> <p>Option 3: Safeguarding land for a future second runway</p> <p>The points made above apply even more to proposals to expand the airport by developing a second runway. The continued safeguarding of land for development of a second runway and the prohibition of any other development serves to indefinitely constrain growth of the area. MRBD acknowledges the airport's desire to retain the option to introduce a second runway and to retain land for that purpose. In so doing MRBD highlights the continued uncertainty and frustration this on-going hiatus brings.</p> <p>Recognising the role Government has in deciding the future of national infrastructure assets like Gatwick Airport, MRBD encourages all parties to work towards a resolution to the status of the safeguarded land to bring an end to the unhelpful uncertainty and blight this effectively brings to Manor Royal and the wider area.</p>

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			<p>While generally supportive of growth at Gatwick Airport, MRBD cannot provide unreserved support for a second runway until further information is provided on key issues concerning; replacing lost commercial space, assisting displaced businesses, housing provision, infrastructure improvements (including but not limited to transport infrastructure) and the intention to involve local companies in any future development and operation of the airport.</p> <p>As well as the associated social and environmental considerations, which go hand in hand with any major infrastructure project of this scale and importance, MRBD needs further clarity about what measures will be put in place to manage the impact of this development on the Business District. Estimates suggest that approximately 1,000,000 square feet of commercial floorspace on Manor Royal will be lost, which equates to between 11% and 12.5% of the total current floorspace offer.</p> <p>In the event that a second runway is pursued, which we recognise is not the specific intent of the Draft Masterplan, we encourage Gatwick Airport to consider in more detail and to make more specific commitments as to how they can contribute to improving the surrounding infrastructure, other than the proposed financial contribution to the local authorities that seems a somewhat passive approach to a notable problem. The contribution proposed (£10m over 5 years) also seems inadequate to make any meaningful difference even to the current situation let alone a scenario where the capacity of the Airport is almost doubled.</p> <p>One of Manor Royal and Crawley's selling points is good transport connections. There are challenges faced by so many people already making the daily commute to the area. It is important these challenges can be met and the current situation not made worse. MRBD would also want to have a much better understanding of the potential impact on major access routes, particularly London Road but also Gatwick Road.</p> <p>In providing this response MRBD acknowledges that its view is one of many. It also acknowledges that most local businesses and business organisations tend to support the expansion of Gatwick Airport, albeit some of that support is tempered. It is important that every effort is made to engage with the business community and that their views are properly represented and taken account of.</p> <p>MRBD looks forward to an on-going dialogue with GAL throughout this process and in helping GAL understand the views of local businesses, particularly those located on Manor Royal Business District.</p> <p>Gatwick Airport Masterplan boundary map Map of changed airport boundary showing increased land take for the safeguarded area to accommodate space for a possible second runway extending further into Manor Royal than previously proposed, potentially affecting more properties and businesses.</p>

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Suggested Modifications:

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REP/032 (2023)	West Sussex County Council	Gatwick Airport Runway Project Transport Modelling ST4	<u>Gatwick Northern Runway Project</u> Gatwick Airport Ltd are developing plans to expand the airport by bringing the northern runway into regular use as part of their Northern Runway Project. There is potential for impacts of the project and the Crawley Local Plan to be cumulative and an application for a Development Consent Order for the scheme is imminent, so this could be a topic of discussion at a future examination in public. In order to provide evidence to inform future discussions on cumulative impacts of these schemes on the transport network, the County Council recommends that a sensitivity test is undertaken and included in the evidence base. This would also help to identify projects that could help to mitigate these cumulative impacts such as the Crawley Western Link Road / Multi-modal Transport Link between the A264 and A23. Suggested Modifications:
REP/152	Save West of Ifield Campaign	10.10	The Local Plan recognises the impact of noise on residents but fails to highlight the potential impact of Gatwick generated aircraft noise on the potential West of Ifield development and the consequent effects on the well-being of residents (Para. 10.10). Suggested Modifications:
REP/152	Save West of Ifield Campaign	10.11	Save West of Ifield questions the assumptions that the Local Plan has made regarding the future growth of Gatwick Airport in view of the numerous uncertainties relating to aviation in general (section 10:11) Suggested Modifications:
REP/152	Save West of Ifield Campaign	Gatwick	The Local Plan rightly highlights the importance of Gatwick Airport as a major employer in the area. However, it fails to analyse the impact of the Airport on housing demand in the area with an influx of workers. It also fails to highlight the need for employment diversification in the area given the uncertainties surrounding aviation as evidenced by the impact of Covid and its aftermath. Suggested Modifications:
REP/011 (2023)	National Highways	GAT1	NH are currently working with Gatwick Airport Limited (GAL) on their proposals for the Gatwick Airport expansion. Due to the close proximity of Gatwick Airport to the borough and the progress towards its expansion, NH would like to understand how the assumptions on development have changed and whether this has any implications for the findings of the Transport Study report which was written in 2020. The traffic forecasts on Gatwick growth will require review to ensure consistency with current forecasts and assumptions relating to the Plan. Suggested Modifications:

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REP/033 (2023)	Horsham District Council	GAT1	<p>Policy GAT1: Development of the Airport with a Single Runway</p> <p>We support this policy in principle but believe that its effectiveness could be improved. Development at Gatwick Airport important will clearly have major impacts in Crawley but also across a wider region that includes Horsham District. As such we have been working alongside CBC and other authorities, as part of the DCO process, to ensure that the impacts of airport growth are properly understood and assessed.</p> <p>We recognise and welcome wording in paragraphs 10.13 and 10.14 relating to considering the cumulative impact of numerous small developments and working with neighbouring authorities, but note that such references are not included within the policy wording. Accordingly, such wording carries less weight and therefore we suggest that similar wording be inserted in the wording of the policy itself.</p> <p>Further, there are references in paragraph 10.12 to passenger numbers, including that 53 million passengers are expected to use the airport in 2023. However, the most recent updated throughput provided to by Gatwick Airport themselves suggest that 32.8 million passengers were using the airport. It may therefore be appropriate to reflect updated information in the introductory paragraph.</p> <p>Suggested Modifications: Changes sought: We seek the inclusion of references to cumulative impacts of development and to working with other authorities within the policy wording. We also advise that it may be useful to supporting text to reflect updated information on passenger numbers.</p>
REP/056 (2023)	Gatwick Airport Limited	GAT1	<p>REPRESENTATIONS BY GATWICK AIRPORT LTD TO THE DRAFT CRAWLEY BOROUGH LOCAL PLAN 2024 – 2040 (MAY 2023) – SUBMISSION PUBLICATION CONSULTATION (REGULATION 19)</p> <p>GAT1: Development of the Airport with a Single Runway</p> <p>1. In our response to the 2020 Regulation 19 DCLP we broadly supported Policy GAT1 but objected to some of the detailed wording of the policy. We suggested some minor amendments to the wording of the policy and the supporting text to address these objections. Most of these changes have been made, although, in view of the fact that the 2021 Regulation 19 DCLP reinstated a policy for the safeguarding of land for a second runway (GAT2), the changes we suggested to the final paragraph of the policy are no longer required.</p> <p>2. We object to the description of Gatwick Airport in the GAT1 policy title and the opening text to the policy as 'a single runway, two terminal airport'. We consider this description fails to recognise that the main runway and the northern runway both form part of the airport's existing operations, although it is accepted that these runways are not currently operational at the same time. We also consider that the stance of the policy predetermines any response the Council may make to the current Northern Runway Project or the addition of a new runway in the safeguarded land at some future time. Consequently, this limitation should be deleted from the policy.</p>

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			<p>3. We note that Criterion (ii) has now been substantially amended through a rebalancing of the assessment approach through the inclusion of the word 'adverse'; the introduction of an additional impact test and the introduction of a requirement for compensation in addition to any mitigation measures. We object to all of these changes.</p> <p>4. The revised 'balance' assessment fails to take into account and give proper weight to the positive benefits arising from sustainable growth at the airport. We consequently request that the word 'adverse' be removed from the policy. Alternatively, to ensure the policy can provide a properly balanced assessment of any growth proposals, the final sentence should be amended to include reference to the benefits of the proposals so that the policy does not just focus on any adverse impacts (refer to wording in square brackets in the proposed policy below).</p> <p>5. We consider it is unnecessary to include the phrase "health and living conditions of the local community" as these impacts are already covered through the list of environmental considerations set out in the criterion and so it is unnecessarily repetitive.</p> <p>6. The proposed requirement for compensation is an attempt to protect private interests and is inappropriate to be included within a planning policy. Compensation is not a planning matter and is dealt with under separate legislation. The consideration of any planning application will include a balanced assessment of any benefit and harm arising from a proposal together with the extent and effectiveness of any mitigation proposed. The application will be determined on the basis of this balanced assessment of its impact, and it would be inappropriate to address any harm which cannot either be mitigated, or which is not outweighed by the public benefits, through payments to private interests.</p> <p>7. We note that the addition of a new criterion (iii) addressing biodiversity and support the approach set out therein subject to the deletion of the words "...or as a last resort, like for like compensation is secured;" Such 'compensation' will be addressed through the mitigation measures referred to, either on or off-site, and so these words are unnecessary and introduce a degree of repetition and ambiguity into the policy.</p> <p>8. We also note the additions to the penultimate paragraph of the Policy but have no comments on these alterations.</p> <p>Suggested Modifications:</p> <p>9. For convenience, the revised wording to the policy we now propose is set out below: <i>"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></p> <p><i>i. The proposed use is appropriate within the airport boundary and contributes to the safe, secure and efficient operation of the airport; and</i></p>


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			<p>ii. The impacts of the operation of the airport on the environment and the health and living conditions of the local community, including noise, air quality, flooding, surface access, visual impact and climate change, are minimised, controlled and where necessary satisfactory safeguards are in place to ensure impacts can be adequately mitigated [where they are not outweighed by the benefits of the proposals];</p> <p>iii. Biodiversity net gain is provided and significant harm to biodiversity is avoided. Where this is not possible, suitable safeguards are in place to ensure impacts can be adequately mitigated or, as a last resort, like for like compensation is secured;</p> <p>iv. Adequate supporting infrastructure, as necessary, particularly for surface access, can be put in place; and</p> <p>v. Where considered necessary and appropriate, the benefits to Crawley's local economy and community are maximised.</p> <p>The control or mitigation, compensation, of impacts as appropriate, and any associated infrastructure and benefits, will be expected to be secured through an appropriate package of planning conditions (Requirements for a DCO) and / or S106 obligations. Where development to enable sustainable growth at Gatwick Airport will be a Nationally Significant Infrastructure Project, criteria i-v above will be taken into account by the Council in preparing its Local Impact Report. (Deletion as proposed by PINS following pre-inquiry conference 20 April 2020).</p>
REP/113 (2023)	Natural England	GAT1	<p>Strategic Policy GAT1: Development of the Airport with a Single Runway</p> <p>We encourage this policy's requirement ii, regarding the need to ensure that adverse impacts of operation on the environment are appropriately mitigated and compensated, as a last resort. We would however also recommend that wording is altered akin to requirement iii to ensure the mitigation hierarchy is taken into account, as explained within the NPPF and National Planning Policy Guidance.</p> <p>We also encourage this policy's requirement iii, regarding the need for Biodiversity net gain to be provided and to ensure harm to biodiversity is avoided; in line with the overarching aims of section 15. of the NPPF and Goal 1 of the EIP. In addition to this, we apologise for overlooking a detail in our non-statutory advice provided on 28 April 2023. After review we believe that the targets established in requirement iii, to meet like for like compensation as a last resort, should be changed to be more consistent with part ii, which establishes fair compensation. As a general rule compensation goes beyond like for like in recognition of the seriousness of this stage in the mitigation hierarchy and the potential difficulties with compensatory habitat creation</p> <p>Suggested Modifications:</p>
REP/151	Manor Royal BID	GAT1 and GAT2	<p>Gatwick Airport (Chapter 10, Strategic Policy GAT1), including Safeguarded Land (GAT2) Manor Royal BID is supportive of a successful Gatwick Airport. It also recognises the need for the Local Plan to provide sufficient space – economically and spatially – for the local economy to diversify, broaden and become more resilient to avoid over-dependence on a single economic driver or industry. The BID is also realistic in</p>

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			<p>recognising the impact and consequences (positive and otherwise) of being located near to a busy international airport and vital piece of the national infrastructure.</p> <p>Para 10.6 refers to the draft Aviation Strategy (Dec 2018) concluding that demand for future runway capacity up to 2030 could be met by a combination of expanding Heathrow with other airports making the best use of existing runways. Due to the uncertainty created by COVID19, predicting future demand is difficult and so the National Infrastructure Commission (NIC) will not consider capacity beyond 2030. Therefore, it has been deemed prudent to continue to safeguard land for a possible future wide-spaced second runway at Gatwick that could, potentially, increase capacity to 95 million passengers per annum (mppa). For comparison purposes in 2017 Heathrow Airport handled circa 78 mppa.</p> <p>Para 10.14 refers to the intention, as part of its Masterplan (2019), for Gatwick Airport Limited to pursue a Development Consent Order (DCO) to bring into routine use the standby runway for smaller aircraft movements, referred to as the Northern Runway Project. This would have the effect of increasing capacity to 75.6 mppa by 2038 and to 80.2 mppa by 2047.</p> <p>In any and each event guidance is clear that airport growth, where it is justified, must meet strict environmental conditions. The BID takes this to apply to both the Northern Runway Project and any future wide-spaced second runway.</p> <p>While airport policy remains unchanged any development in the safeguarded area would be prohibited with the exception of small residential extensions or the refurbishment of existing buildings, increased land take for the Gatwick Safeguarded area at the northern boundary of Manor Royal, compared to the extent of land required to be safeguarded in previous iterations of the Local Plan, effectively blights more land from being developed and curtails minor extensions to the business district that the Local Plan states it supports. Therefore: <u>The Manor Royal BID regrets the Council has not been able to release land to allow sustainable growth of Manor Royal to the north, as was the previous intention when it proposed introducing an Area Action Plan. The Manor Royal BID does not support the extension of the Gatwick Airport Safeguarded Area that prevents even minor extensions. The extent of the safeguarded area should at least be returned to the previous boundary line and, if possible, tested further to allow more land to be released for the development and extensions of Manor Royal to come forward. Acceptance of the extended safeguarded area is contrary to supporting Manor Royal's growth and the diversification of Crawley's economic base and forces the Council to allocate other land for development outside the main employment areas. This is not a sustainable approach for any town much less one where land is scarce and has the effect of increasing the cost of development by limiting land supply.</u></p> <p>The continued need to safeguard land for a second runway (Policy GAT2) and the extent of land identified in the Local Plan blights development for a seemingly indefinite period with little challenge or indication when</p>


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			<p>that might be reviewed, therefore; <u>The Manor Royal BID regrets the Council has not been able to release land to allow sustainable growth of Manor Royal to the north as was the intention of the previous iteration of the Local Plan and encourages the Council to challenge GAL on the extent of land to be safeguarded, makes clear its intention to review the approach to continued and indefinite safeguarding of land for a second runway and signals its clear intent to review this as soon as practicable involving an immediate review of the Local Plan when changes to national aviation policy allow.</u></p> <p>The Local Plan policies support development of the airport with a single runway (Policy GAT1) and recognises the intention to bring into routine use the standby runway, which would increase capacity from circa 48 mppa to 75.6 mppa by 2038, and eventually to 80.2 mppa. Therefore; <u>As per our previous responses, while the Manor Royal BID is generally supportive of growth at Gatwick Airport with a single runway including plans to bring into more active use the standby runway to further meet the increasing demand for air travel, while not increasing the actual footprint of the airport. This support is on condition that safety is not compromised, and due consideration is given to the impact this may have on the surrounding area, particularly in terms of congestion, increased demand this would create for employment land and housing in an already highly constrained area and secondary issues related to possible wage inflation and commuters and passengers parking in surrounding areas. On these points we are not entirely convinced that sufficient measures have yet been taken to mitigate these impacts and believe there is a case for GAL to work more closely with the local authorities to invest in the local infrastructure including support for measures to control parking issues created by airport users in areas like Manor Royal. The burden of managing and controlling these issues should not fall entirely on the local authorities.</u></p> <p>Suggested Modifications:</p>
REP/005 (2023)	Thames Water	GAT2	<p>We support the deletion the Gatwick Airport Safeguarded Land policy.</p> <p>The previous safeguarded area includes Thames Water's Crawley Sewage Works and therefore provided uncertainty in relation to future upgrades at the sewage works.</p> <p>There are currently no approved plans for an additional runway at Gatwick Airport and this does not form part of the Government's Aviation Strategy and therefore we agree the safeguarding should be removed.</p> <p>Suggested Modifications:</p>
REP/027 (2023)	LRM Planning on behalf of WT Lamb Properties,	GAT2	<p>POLICY GAT2: SAFEGUARDED LAND</p> <p>1. Our clients object to the policy in its current form as it includes land to the east of Balcombe Road that can play no practical role in the provision of a second runway nor the infrastructure that has been identified if a second runway was to be provided in the future.</p> <p>National Planning Policy Requirements</p>

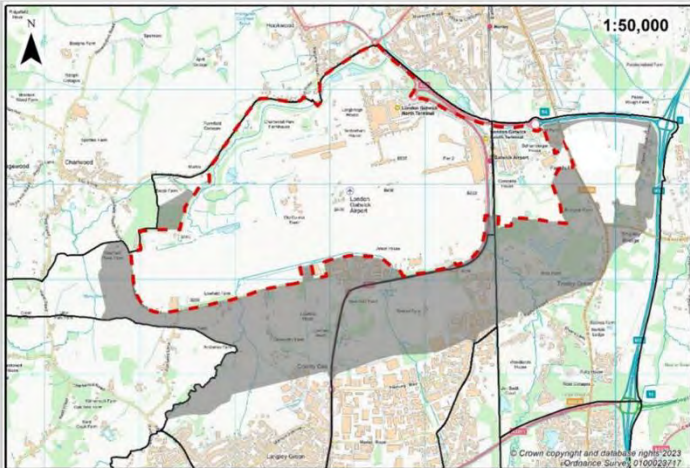
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	the Dye Family and Elliott Metals/the Simmonds Family		<p>2. The National Planning Policy Framework (NPPF) (2021) establishes the Government’s planning policies for England and how they are to be applied. It provides a framework within which locally prepared plans can be produced (paragraph 1). This forms the basis for our representations.</p> <p>3. Paragraph 15 of the NPPF states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area, a framework for addressing economic, social and environmental priorities, and a platform for local people to shape their surroundings.</p> <p>4. Plans should: be prepared with the objective of contributing to sustainable development; be positively prepared, but deliverable; shaped by effective engagement; contain policies that are clearly written and unambiguous; be accessible through the use of digital tools; and serve a clear purpose (paragraph 16).</p> <p>5. Development plans must include strategic policies to address an area’s priorities for development and the use of land (paragraph 17). Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for inter alia housing; employment; retail; leisure; other commercial development; infrastructure; community facilities; and the conservation and enhancement of the natural, built and historic environment and measures to address climate change (paragraph 20).</p> <p>6. The preparation and review of policies should be underpinned by relevant and up-to-date evidence, that should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned (paragraph 31).</p> <p>7. Local plans will be examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound (paragraph 35). Plans are sound if they are: a) Positively prepared – provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and is informed by agreements with other authorities; b) Justified –provide an appropriate strategy, taking into account other reasonable alternatives, based on proportionate evidence; c) Effective – deliverable over the plan period and based on effective joint working on crossboundary strategic matters; and d) Consistent with national policy – enabling the delivery of sustainable development in accordance with policies within the NPPF.</p> <p>8. As it is currently written the identification of safeguarded land to the East of Balcombe Road cannot be considered to comply with the tests of soundness as it is not deliverable nor based on robust evidence in respect of the requirements of NPPF.</p> <p>Gatwick Green</p> <p>9. In removing the proposed allocation at Gatwick Green from the safeguarded area identified the Council have based their proposals on master plan 20 (figure 1 below). This shows the land to the east of Balcome Road as car parking. The logic in removing Gatwick Green is set out at para 10.21 of the plan: “the Local Plan</p>

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			<p>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. “</p> <p>10. It seems nonsensical therefore to include incremental parcels of land (including our clients site) as safeguarded land for a purpose that it cannot possibly fulfil which requires a comprehensive approach. Furthermore, the Council is clear that it has moved away from large scale car parking which the master plan envisages for our clients site. Rather it is more logical to allocate the wider area as part of Gatwick Green to meet the employment land shortfall as we have set out in our representations in respect of Policy EC1 and EC4. In this regard we are supportive of the principle of the approach taken by the Council but believe it needs to relate to the “left over” parcels of land to the East of Balcombe Road which ill be sterilised in the short term to contribute towards local needs yet with no role to play in any expansion if it were to ever be considered appropriate.</p>  <p>PLAN 20 - Airport Layout <i>Asstional Runway</i></p> <p>Figure 1. Plan 20 - Airport Layout</p> <p>Current Airport Proposals</p> <p>11. It is informative to consider the latest proposals for the use of the standby runway at Gatwick Airport. The proposals for accessing the airport are shown at figure 2, in the first instance, they conflict with (and supersede) Master Plan 20 and secondly they show no access or provision to access the safeguarded land. This seems at odds with the wording in the plan as it currently stands which does not reflect the intended approach of the airport (ie the two plans are physically incompatible). 12. Indeed, based on these proposals and the removal of the current extent of Gatwick Green, alongside the reluctance to identify large areas of</p>

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			<p>surface car parking, it is evident that the residual areas of safeguarded land to the east of Balcombe Road would serve no useful purpose.</p>  <p>Figure 2. Proposed access arrangements for use of second runway.</p> <p>CHANGES REQUIRED IN ORDER TO ENSURE THAT THE PLAN IS COMPLIANT WITH NPPF</p> <p>13. It is clear residual parcels of land to the east of Balcombe Road that remain in the safeguarded area serve no practical purpose:</p> <ol style="list-style-type: none"> a. Given that the current extent of Gatwick Green is to be removed, the residual areas (including our clients site) could not be used to contribute towards Master Plan 20. This is now out of date and superseded by the current proposals for the standby runway; and b. The current proposals for the increased use of the standby runway would not allow for access to the east of Balcombe Road and are physically incompatible with the car parking uses identified in Master Plan 20. Indeed, it is not possible to access our clients landholding via the airport land which make the master plan 20 proposals unimplementable absent the land controlled by the Wilky Group. This removes any likelihood of our clients land serving any useful purpose as being safeguarded. <p>14. There is therefore no useful purpose in retaining the incremental parcels of land to the east of Balcombe Road for safeguarding purposes. They cannot contribute towards substantive infrastructure and given the desire to move away from surface car parking (as indicated by the Council in the Plan) we believe that they would be better and more efficiently used in contributing towards employment needs. Indeed this is wholly contrary to the requirements of the NPPF, the approach is inter alia not positively prepared, justified, effective or consistent with national policy.</p>

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			<p>Suggested Modifications: 15. Accordingly, our requested change is that the safeguarding map plan should be redrawn to exclude our clients site as shown below. In addition further consideration ought to be given as to whether to further exclude all of the strips of land to the east of Balcombe Road.</p> 
REP/032 (2023)	West Sussex County Council	GAT2 ST4	<p>WSSCC objected to the previous Regulation 19 consultation (in 2021) due to a conflict between safeguarded land for the potential future additional wide space runway at Gatwick airport and the safeguarded search corridor for a Crawley Western Link Road. Further technical work has now taken place and a solution has been found, WSSCC would like to withdraw this objection.</p> <p>Suggested Modifications:</p>
REP/033 (2023)	Horsham District Council	GAT2	<p>Policy GAT 2: Safeguarded Land We support this policy, which sets out a clear basis for determining applications within this area. This is consistent with the approach taken by HDC.</p> <p>Suggested Modifications:</p>
REP/035 (2023)	Vail Williams on behalf of Ardmore Ltd	GAT2	<p>Response on Behalf of Jersey Farm for Crawley Borough Council Local Plan Review 2024 - 2040 Regulation 19 Local Representations Further to our previous representations to both Regulation 18 and 19 of the Crawley Borough Council Local Plan Review (LPR), we are writing on behalf of our clients Ardmore Ltd regarding land at Jersey Farm, which</p>

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			<p>is located to the North of the Borough and immediately adjacent to Manor Royal, the towns largest Main Employment Area.</p> <p>In line with our previous Regulation 18 & Regulation 19 representations, we still wish all previous comments to be considered by CBC and these additional June 2023 comments should be read in association with all our previous representations, including Connect Consultants Transport’s technical notes supporting our planning representations.</p> <p>Our main areas of comment on this Regulation 19 draft of the 2024-2040 Local Plan relate to the Local Plan Policies affecting our site, identified as outside the Built Up Area Boundary and the supporting evidence base, primarily the updated May 2023 Topic Papers, new 2023 evidence base documents and the May 2023 Sustainability Appraisal (SA).</p> <p>We also will make further detailed comment on the updated evidence base, especially in relation to the following:</p> <ul style="list-style-type: none"> • Economic Growth and Employment Policies EC1, EC2, EC3, EC4 and EC5; • Gatwick policies GAT 2 and GAT3; • Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link; • overarching policies relating to Sustainable Transport ST1 and ST2, Sustainable Development SD1; Water Neutrality policy SDC4; and • CL3 on Character Landscape and Form, and CL8 Development Outside the Built Up Area Boundary CL8. <p>For the reasons set out below we submit that the Local Plan as drafted is unsound. Policies EC1, EC4, ST1, ST4, CL3 and CL8, and GAT2 are unjustified, ineffective, and inconsistent with national policy.</p> <p><u>Gatwick & Safeguarding Policy GAT2:</u></p> <p>The allocation and protection of safeguarding at Gatwick has been discussed at previous Core Strategy and Local Plan Examinations. This historic evidence base regarding safeguarding is still being used to underpin this 2040 LPR. Previous iterations of the LPR included an area of search for an Area Action Plan (AAP) that looked to allocate potential Strategic Employment Locations (SEL) on safeguarded land. Our clients supported this approach that contemplated this positive change. Topic Paper 2 on Gatwick explains that the Council’s position has changed following a steer on a critical friend basis from PINS. Given this Regulation 19 version retains safeguarding, we argue that the policy as drafted is unsound as it is based on outdated central government policy and does not reflect the Airports Commission’s finding that endorses an additional runway at Heathrow instead of Gatwick.</p>


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			<p>Topic Paper 2: Gatwick Airport May 2023 confirms that the Local Plan supports development of an airport with a single runway (GAT1) and Safeguarded Land (GAT2). It also recognises the link with ST4: Safeguarding of a search corridor for CWMRTL.</p> <p>In relation to the council's current evidence base, Topic Paper 5: Employment Needs and Land Supply also confirms that initial PINs advice has been sought on the matter of safeguarding. It states that <i>"Pointing to continued uncertainty as to whether safeguarding could be lifted and the timescales for doing so, the inspector's position was that an Area Action Plan would unlikely be effective, as the approach would result in a significant change to the Plan's overall development strategy. In those circumstances, an AAP would not be appropriate because it should be consistent with the strategy of the submitted Plan. As such, the inspector's advice was that the Plan should contain a review trigger rather than a reference to an AAP, enabling the whole development and spatial strategy to be re-examined should the additional land become available."</i></p> <p>CBC confirm in para 4.32 that <i>"considering the steer from the advisory Inspector, GAL's objection and the draft national Aviation Strategy's statement, the council revised its approach, considering the geographic extent of safeguarding rather than questioning the principle of its retention."</i></p> <p>CBC have therefore based their assessment on the GAL Masterplan 2019 as a guide for suitable development, however we contest that maintaining historical safeguarding without robust evidence to justify it, in principle and extent is flawed. An alternative approach to the use of the land in sustainable locations on the edge of Manor Royal, such as Jersey Farm should be considered by the Inspector (and CBC) in light of the need for additional sustainable employment land in the Borough and the existing evidence as to any potential future expansion at Gatwick airport.</p> <p>Whilst CBC state that GAL are actively supporting the Government approach that maintains safeguarding should an additional runway be required in the future, we contest that this policy approach relies on outdated and <i>"rolled over"</i> evidence that does not reflect the opportunities being proposed by GAL, under the promoted Development Consent Order (DCO) for the open use of the Emergency or Northern Runway.</p> <p>Both the August 2019 Masterplan document and its executive summary <i>"Making best use of Gatwick"</i> form the basis of the GAL future proposals for the airport. Plan 19 (p173) shows a widening of the taxiway (1) and the reconfiguring the Rapid Exit Taxiway (4), and plan 20 at (p174) indicates that an additional runway to the South and shows that areas within the Jersey Farm site could be required for a noise bund.</p> <p>Whilst the 2019 GAL Masterplan illustrates that a noise bund may be required, we believe that even if the principle of continued safeguarding is accepted by the Inspector, a reduced envelope would be appropriate and suitable, allowing the release of additional sustainable employment land to the North of Manor Royal. We</p>

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			<p>also consider that the 2019 GAL Masterplan should not be regarded as determinative, especially as it is materially different to what GAL are currently promoting through the DCO.</p> <p>No evidence has been submitted to demonstrate any up-to-date assessments of the potential alternatives having been further tested regarding the ability to use the Northern runway (as promoted by DCO) or using less of the existing safeguarded land.</p> <p>The 2015 Inspector's Report acknowledged that safeguarding was appropriate, at that time as the council was still pending the Airports Commission decision on an additional runway. Para 12 of the Inspectors Report stated "<i>Substantial areas of potentially developable land in the north of the borough are currently safeguarded from development which would be incompatible with the development of a second runway. Consequently, the Government's decision on the location of an additional runway could have significant implications for future development in the borough.</i>" However, this has now been concluded with Heathrow selected.</p> <p>Para 13 & 14 of Inspector Pikes Report on the 2015 Local Plan stated that to wait for the government decision was "<i>a sensible approach, for trying to address all development options for different runway scenarios would have been unduly complex, potentially confusing and very time-consuming. Accordingly, I indicated at the outset of the examination that I would not consider evidence which sought to take account of the second runway decision.</i>"</p> <p>The council's Topic Paper 5 Employment Needs and Land Supply also states that "<i>The Local Plan Inspector for the 2015 Local Plan required the council to identify as much developable land as possible from within the borough (a "leave no stone unturned" approach).</i></p> <p>However, the position has changed since 2015, with the Airports Commission clearly now endorsing growth at Heathrow and therefore the "status quo" of simply rolling over the safeguarding is not appropriate and is unsound, because it both ignores the additional runway commitment at Heathrow and the ongoing DCO work by GAL. This does not replicate the required "<i>no stone unturned</i>" approach required by Inspector Pike. Therefore, another 8 years on from the 2015 Inspector's Report, the Local Plan Review should reflect this up-to-date position in its policies and its evidence base. Simply continuing to roll over the principle of safeguarding is unjustified and policy GAT2 is unsound.</p> <p>In addition, the safeguarded area in the Local Plan Review has been extended in size and scale to reflect the GAL 2019 Masterplan without any sufficient evidence to justify the extension and despite the 2023 DCO. Further, 2 policies are inconsistent with the GAT2 safeguarding:</p> <p>i the Crawley Western Relief Road under Policy ST4 which removes land from safeguarding, and is inconsistent with the 2019 GAL Masterplan and</p>

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			<p>ii the Gatwick Green EC4 allocation for strategic employment allocation on land which is in the safeguarding area (and identified in the 2019 Masterplan for car parking, and additional hotel or office development).</p> <p>Both of these proposed incursions and policies are inconsistent with the airport safeguarding otherwise promoted by the council and both incursions are unjustified, ineffective and unsound.</p> <p>The National Planning Policy Framework para 106 (c) & (e) states that: <i>“Planning policies should: c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development; e) provide for any large-scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements;</i></p> <p>Policy ST4 identifies an area of search but this appears inconsistent with the GAT2 safeguarding and also indicates that, where CBC considers it to be required, the extent of safeguarding can be treated as flexible and capable of amendment.</p> <p>The coalition Government’s Airports Policy 2013 para 5.9 stated <i>“Land outside existing airports that may be required for airport development in the future needs to be protected against incompatible development until the Government has established any relevant policies and proposals in response to the findings of the Airports Commission, which is due to report in summer 2015.”</i></p> <p>In December 2018 the Government released Aviation 2050. Our client responded to the consultation stating that safeguarding had blighted land in Crawley for decades and clarity over future Aviation provision should be provided. A copy of our formal representation can be provided.</p> <p>Para 3.66 of the Consultation Strategy document confirmed that <i>“Several airports safeguard land for future developments. The safeguarded land can be a mix of airport, council and private ownership, depending on the individual airport’s circumstances. It is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth. The National Planning Policy Framework (NPPF) has restated the government’s commitment to “identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice”. The government believes that this provides sufficient guidance for local authorities to consider the future needs of airports and their associated surface access requirements, when developing local plans.”</i> (Emphasis added).</p>

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			<p>Since publishing the Airports Policy in 2013 the Airports Commission has found in favour of Heathrow for additional runway capacity. However, despite that material change in circumstances, CBC seeks to rely on rolling over the land safeguarded in 2015, as now proposed to be extended by GAL. The LPR therefore fails to justify the principle or extent of the safeguarding, on the basis of robust and up to date evidence. Further, the boundaries for the proposed safeguarded area are being inconsistently applied so as to unjustifiably seek to exclude the Gatwick Green allocation (EC4) and to inconsistently safeguard land for the Crawley Western Multi-Modal Transport Link (CWMTL) (ST4).</p> <p>The May 2023 Sustainability Appraisal states that Objective 5 is key to employment growth in order “<i>To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.</i>” We support this objective.</p> <p>In addition, the SA criteria for assessment confirms that the Local Plan seeks to ensure Investment attractiveness, whilst recognising that insufficient land supply exists and is resulting in a lack of qualitative and quantitative employment floorspace, fit for current & future business growth.</p> <p>The SA also confirms that Crawley has experienced a “<i>Changing Economy</i>” and states that “<i>The recent economic implications arising from COVID-19 have shown Crawley’s economy to be very reliant on the aviation sector, and as identified by the Economic Recovery Plan (2021) there is need to support continued economic recovery and diversification</i>”.</p> <p>In regard to the Growth at Gatwick, the Sustainability Appraisal confirms that pre covid levels of passengers per annum at the Airport are now demonstrating recovery at the Airport but there is <i>also “a need to support the continued economic recovery of aviation related sectors, whilst also supporting the diversifying of Crawley’s economy so that it is more responsive to change.</i> “. Whilst we agree with the approach, we would suggest that this needs to relate to opportunities both on airport and off airport, especially those locations suitable for development close to the airport’s current boundary.</p> <p>Para 5.11 of the SA states that it has tested under Scenario 3 (Crawley borough focus), “<i>the introduction of policies seeking to increase densities and maximise effective use of land,and ... The extent of the safeguarding required for further expansion of Gatwick Airportto open potential opportunities for balancing the needs of the Airport with other economic needs.</i>”</p> <p>The SA fails to robustly address opportunities to maximise effective use of land, or the extent of safeguarding required for further expansion of Gatwick Airport and prioritises potential airport growth over the ability for the local economy to diversify and be more robust to aviation patterns of growth and consolidation.</p> <p>Local landowners and developers, as well as local stakeholders and business groups are significantly frustrated with the ongoing constraint to economic land supply and GAL objections to any planning</p>

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			<p>applications within safeguarding boundaries, including as proposed to be extended, which is further stifling economic growth. We also note that the Consultation Statement Appendix C relating to The Wilky Group's (TWG) submissions (in support of the proposed Gatwick Green allocation), confirm TWG agree that the safeguarding area protected in the Local Plan 2015 is now outdated following the Airports Commission's findings and national and local evidence no longer warrants the safeguarding to the North of Manor Royal.</p> <p>The Economic Growth Assessment (EGA) supporting this Local Plan as well as the Employment Land Area Assessment (ELAA) and the Employment Land Trajectory (ELT) indicate that insufficient land is available and therefore we believe the LPR Inspector should scrutinise all opportunities for the reassessment of safeguarded land, to facilitate increased employment development, especially those that are sustainable and located adjacent to Main Employment Areas.</p> <p>The Employment Topic paper 5 also clarifies that <i>"the requirement to safeguard land for a possible future southern runway at Gatwick Airport severely restricted the supply of available land for employment."</i></p> <p>Government planning objectives are set out in Para 8 of the National Planning Policy Framework (NPPF) 2021 which confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, linking the three-overarching economic, social, and environmental objectives.</p> <p>In relation to the economic objective, para 8a outlines the need <i>'to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure'</i>. Para. 8b outlines the social objective to support strong, vibrant, and healthy communities, and para. 8c outlines the environmental objective to protect and enhance our natural, built and historic environment, including through making effective use of land, minimising waste and pollution and mitigating and adapting to climate change.</p> <p>Suggested Modifications:</p> <p>By maintaining safeguarding without an up to date evidence base to justify both the principle and extent, we submit that: (i) GAT2 is inconsistent with the NPPF; (ii) Policy GAT2 and Topic Paper 2 are inconsistent with Policy ST4 and EC4, where safeguarding has been amended, and (iii) the policy should be further amended to reflect an up to date and robust alternative assessment of any necessary extent of airport safeguarding, which can then be consistently applied across the whole plan, rather than the partial, inconsistent and unjustified alterations to safeguarding currently proposed.</p>
REP/050 (2023)	Homes England	GAT2	<p>Rowley Farm - GAT2: Safeguarded Land</p> <p>We continue to recognise the national policy drivers for the continued safeguarding area proposed for the potential southern runway of Gatwick Airport and support the progress made within the revised policy wording and evidence relating to the areas of search for the Crawley Western Multi-Modal Transport Link found within</p>

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			<p>Policy ST4, with reference and support for the text of paragraph 17.29. The amendments made aligns with our previous recommendations made in the West of Ifield 2021 representations.</p> <p>Given the importance of the Western Multi-Modal Transport Link to address cumulative development impacts across Crawley and the wider area, the flexible approach at the eastern (A23) end of the proposed link that seeks to balance the risk of safeguarding conflict against the potential loss of employment land and ability to deliver the Western Multi-Modal Transport Link as a strategic transport link is supported. The supporting feasibility study shows alternative options that could be deployed in the event a southern runway does come forward which is considered a sound approach given the uncertainty around a southern runway at this time and the need for wider land use impacts to be considered as part of any runway proposal at that time.</p> <p>Homes England supports the wording within supporting text paragraph 10.18 for the trigger of a Local Plan Review should a change in National Aviation Policy come forward and we will welcome engagement in any future Local Plan Review, however in the interim, should safeguarding fall away Policy CL8 should be applied to this site.</p> <p>Homes England looks forward to working positively with the Council and other stakeholders in the development of the Local Plan.</p> <p>Annex 1 – Annex 1 Homes England’s Red Edge Ownership at Rowley Farm</p> <p><small>Annex 1 – Annex 1 Homes England's Red Edge Ownership at Rowley Farm</small></p>  <p>Suggested Modifications:</p>
REP/050 (2023)	Homes England	GAT2 and ST4	<p>Conflict between Policy GAT2 (Gatwick safeguarding area) and Policy ST4 (Crawley Western Multi-Modal Transport Link)</p> <p>We continue to recognise the importance of the safeguarding area proposed for the potential southern runway of Gatwick Airport and support the progress made within the revised policy wording and evidence relating to the areas of search for the Crawley Western Multi-Modal Transport Link found within Policy ST4, with</p>

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			<p>reference and support for the text of paragraph 17.29. The amendments made aligns with our previous recommendations made in the 2021 representations.</p> <p>Given the importance of the Western Multi-Modal Transport Link, the flexible approach at the eastern (A23) end of the proposed link that seeks to balance the risk of safeguarding conflict against the potential loss of employment land and ability to deliver the Western Multi-Modal Transport Link as a strategic transport link is supported. The supporting feasibility study shows alternative options that could be deployed in the event a southern runway does come forward which is considered a sound approach given the uncertainty around a southern runway at this time and the need for wider land use impacts to be considered as part of any runway proposal at that time.</p> <p>Suggested Modifications:</p>
REP/053 (2023)	Quod on behalf of Barker Trust	GAT2	<p>Therefore, is no robust evidence for the reinstatement of the Gatwick Airport second runway safeguarding and Draft Policy GAT2 should be deleted, and the Site released to meet the industrial employment need. The existing passenger throughput at the airport is 46mppa and Gatwick Airport predicts 62mppa by 2038 (without the second runway) with 74mppa by 2038 (with the second runway). This sufficient capacity covers the life of the plan and there is no robust evidence that in this plan period there will be a requirement for further expansion with a second runway.</p> <p>Gatwick Airport Safeguarding The NPPF states that planning policies should “identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development” (Paragraph 106, our emphasis).</p> <p>In line with our representations to the Regulation 18 Draft Local Plan, the Council accepted that “robust evidence” did not exist to maintain the safeguarding for a second runway and deleted draft Policy GAT2 (Safeguarded Land) in the Draft Local Plan 2020 with Paragraph 3.20 stating: “The council does not consider there is, at this time, robust evidence to justify the continued safeguarding of land for a further runway at Gatwick, and in light of the other significant needs arising which this land could support, commits to commencing work on an AAP to determine the most appropriate use of this land for future development needs rather than just protecting an extensive area for one use.” (our emphasis)</p> <p>Draft Local Plan 2021 deleted the North Crawley Area Action Plan (“NCAAP”) and reinstated Draft Policy GAT 2 and expands the airport safeguarding corresponding to the area identified in the Gatwick Airport Masterplan 2019.</p> <p>There has been no material change in the planning policy position from the publication of the Draft Local Plan 2020 to that of the Draft Local Plan 2023 to warrant the safeguarding. Paragraph 10.17 of the Draft Local Plan</p>

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			<p>2023 states: “The National Infrastructure Commission Baseline report in 2021 concluded that the Second Assessment due in 2023 would not consider airport capacity because future demand and the approach to expanding runway capacity in the south east is currently unclear. 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.” This is an unsound approach to take. Uncertainty regarding the need to safeguard land does not equate to robust evidence justifying such safeguarding. The planning requirement is not that there has to be certainty that safeguarding is not required, but that robust evidence is required for land to be safeguarded. The necessary robust evidence does not exist.</p> <p>The existing passenger throughput at the airport is 46mppa and Gatwick predicts 62mppa by 2038 (without second runway) with 74mppa by 2038 (with the second runway). There is sufficient capacity without the second runway for the life of the plan and there is no robust evidence that in this plan period there will be a requirement for expansion.</p> <p>Furthermore, the Gatwick Airport Masterplan 2019 pre-dates Covid and its associated impacts which has not been addressed in the Draft Local Plan 2023 nor its supporting evidence.</p> <p>The Draft Local Plan 2023 continues makes reference to review of the Local Plan “should changes to national aviation policy allow for the removal of the safeguarding of all the land for Gatwick Airport expansion” (Paragraph 1.33).</p> <p>However, both Paragraph 3.66 of the Draft Aviation Strategy and Paragraph 106 of the NPPF are clear that robust evidence is required and this needs to be provided as part of the emerging Local Plan review. For the emerging local plan to be consistent with national policy and found to be sound, robust evidence must be provided as part of this review.</p> <p>There is no evidence, let alone robust evidence, to support the need for a second runway at Gatwick following the designation of the ANPS, and the Court of Appeal was clear in identifying that a second runway option at Gatwick Airport was not objectively capable of being a solution for meeting the need for additional airport capacity in the South East. Paragraph 93 states the following: “Given that a central purpose of the ANPS was to promote the United Kingdom’s status as an “aviation hub”, we see no room for a submission that the Secretary of State acted unlawfully in rejecting the Gatwick second runway scheme on the evidence that it could not fulfil that objective. On the contrary, as we have said, since there was a clear and unassailable finding that expansion at Gatwick “would not enhance, and would consequently threaten, the UK’s global aviation hub status” (paragraph 3.19 of the ANPS), a scheme for the development of a second runway at that airport could not realistically qualify as an “alternative solution” under article 6(4). <u>In fact, it would be no solution at all.</u>” (Our emphasis)</p>

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			<p>The ANPS and the Court of Appeal judgment make it clear that a second runway at Gatwick is not a solution to the need for further runway capacity in the South East. GAL's previous objection relies on the Airports Commission report, which pre-dates both the ANPS and the Court of Appeal case, and its evidence as to the criticality of further runway capacity. This is clear and robust evidence that safeguarding is not required.</p> <p>The draft safeguarding area covers the previously non-safeguarded land. This is based on the Gatwick Airport Masterplan 2019. As we do not consider robust evidence exists for the safeguarding, it should not extend to land which was previously not identified as such, particularly on the basis of on an airport driven masterplan.</p> <p>The NPPF requires that there is "robust evidence" for such safeguarding and in light of the designation of the ANPS and the Court of Appeal and Supreme Court decisions there is no such robust evidence as previously confirmed by the Council. For the Draft Local Plan 2023 to be found sound Draft Policy GAT2 must be deleted.</p> <p>There is no robust evidence for the Gatwick Airport second runway safeguarding and Draft Policy GAT2 should be deleted.</p> <p>Suggested Modifications: For the Draft Local Plan 2023 to be found sound Draft Policy GAT2 must be deleted.</p>
REP/055 (2023)	Gatwick Green (Wilky)	GAT2	<p>1.0 Introduction</p> <p>1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. The representation relates to Policy GAT2 Safeguarded Land in the Draft Crawley Borough Local Plan, 2023 (DCBLP).</p> <p>1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The plan at Appendix 1 shows the land owned by GGL and the extent of the proposed Gatwick Green allocation. The land has been promoted by TWG/GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>Scope of representation</p> <p>1.3 This representation does not address the principle of Safeguarded Land for a possible additional wide-spaced runway at Gatwick Airport. Instead, it focuses on the extent of safeguarding under Policy GAT2 as identified on the draft Local Plan Map and its interface with Gatwick Green.</p>

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			<p>1.4 Land use planning and aviation evidence is provided to demonstrate that Gatwick Green can be developed in a manner that is fully compatible with, and not prejudicial to, the future development of an additional wide-spaced runway at Gatwick Airport.</p> <p>1.5 The representation also contains detailed evidence to support minor adjustments to the DCBLP to ensure that a land and resource-efficient approach is taken in the planning of shared highway access infrastructure.</p> <p>Executive Summary</p> <p>1.6 GGL supports Gatwick Green being removed from the extent of the Safeguarded Land, as identified under draft Policy GAT2, and provides evidence to demonstrate that Gatwick Green can be developed in a manner that is fully compatible with, and not prejudicial to, the future development of an additional wide-spaced runway at Gatwick Airport. The representation includes airport planning evidence by Mott MacDonald to support the case being made.</p> <p>1.7 The Aviation Policy Framework (APF²¹) and the National Planning Policy Framework (NPPF, 2021) provide national aviation and planning policy to guide the future expansion of airport infrastructure. The APF states that airport master plans should be subject to wide consultation with local authorities, the community and stakeholders, allowing the future development of airports to be considered in the local plan process. Airport Master Plans should contain <u>sufficient information and drawings</u> to identify any additional land requirements, which under the NPPF must be based on 'robust' evidence to identify any infrastructure that is 'critical' to the scheme so as to <u>minimise long-term uncertainty and blight</u>.</p> <p>1.8 Gatwick Airport Ltd (GAL) prepared the Gatwick Area Master Plan in 2019²² (GAMP). The GAMP is a key document where the evidence and justification for safeguarding is expected to be found. The Council should therefore expect to see the robust evidence that supports the extent of the Safeguarded Land in the GAMP. However, whilst the GAMP includes a conceptual layout for an additional runway, this is not underpinned by any evidence to support the extent of land safeguarded for surface parking east of Balcombe Road (c 92 ha or 227 acres).</p> <p>1.9 The evidence, therefore, supports the Council's decision to remove some of the historically Safeguarded Land indicated as surface airport-related car parking related to a future additional wide-spaced runway to allow the allocation of Gatwick Green. The Council's decision is based on the conclusion that surface parking does not represent an efficient use of this land, particularly in light of anticipated proposals by GAL to provide more land-efficient car parking and sustainable surface access.</p>

²¹ The Aviation Policy Framework, DfT, March 2013

²² Gatwick Airport Master Plan 2019, Gatwick Airport Ltd, July 2019

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			<p>1.10 Indeed, GAL is already planning more land-efficient parking solutions through its Development Consent Order (DCO) for the continuous use of the emergency runway. The continued sterilisation of Gatwick Green for future car parking would represent an unnecessary, inefficient and inappropriate use of a key strategic site needed to meet the clear and urgent economic needs of the Borough.</p> <p>1.11 The evidence also demonstrates that the highway requirements related to Gatwick Green and the additional wide-spaced runway can be accommodated in the Safeguarded Land between the Gatwick Green allocation and the M23 spur road – this represents a resource-efficient solution with significant benefits for GGL and GAL. These matters have been the subject of discussions between GGL’s transport consultant and Gatwick Airport Limited (GAL). Some minor adjustments to the DCBLP are proposed to allow for the joint use of this strip of Safeguarded Land.</p> <p>1.12 The evidence shows that in all other respects, Gatwick Green can be developed to be mutually compatible with the future development of an additional wide-spaced runway.</p> <p>2.0 Extent of Safeguarded Land</p> <p>Introduction</p> <p>2.1 GGL provides evidence to demonstrate that the removal of Safeguarded Land from Gatwick Green under draft Policy GAT2 and identified on the Local Plan Map is justified. Evidence is also provided to demonstrate that Gatwick Green can be developed in a manner that is fully compatible with, and not prejudicial to, the future development of an additional wide-spaced runway at Gatwick Airport. GGL also proposes some minor adjustments to the Safeguarded Land to reflect GAL’s requirements and GGL’s landownership, and to policy wording to ensure that Gatwick Green can be fully developed in a land and resource-efficient manner which offers mutual compatibility with an additional runway in terms of highway / access infrastructure. The representation includes airport planning evidence by Mott MacDonald to support the case being made.</p> <p>Safeguarding under national policy</p> <p>2.2 The Aviation Policy Framework (APF, 2013) provides current Government policy on aviation. The APF recommends that airports continue to prepare Master Plans to address the future development and expansion of airports (paras 4.11-4.12). In preparing local plans, local authorities are required to have regard to policies and advice in the APF, along with other relevant planning policy and guidance (para 5.6). Airport Master Plans should, <i>inter alia</i>, include any long-term land requirements associated with future airport development (para B.5) and that this should be clearly identified on a safeguarding map (para 5.8) to minimise long-term uncertainty and non-statutory blight (para B.5). However, the responsibility for safeguarding land for future expansion rests with local planning authorities based on guidance in the National Planning Policy Framework (NPPF). Similar guidance is contained the UK</p>

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			Government's Aviation Green Paper, known as the draft Aviation Strategy (AS, 2018 – para 3.66), although this is not formal Government policy.
			2.3 The National Planning Policy Framework (NPPF, 2021) provides for the protection of sites and routes for future transport. The policy is contained at para 106(c)), which states that planning policies should: " <i>(c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;</i> " (Savills emphasis)
			2.4 The Aviation Policy Framework (APF ²³) reiterates the above policy from the NPPF at paragraphs 5.8-5.9, and goes on to state that Airport Master Plans should provide a clear statement of intent to enable future development of an airport to be given due consideration in local planning processes. It also requires that there should be wide consultation with local communities, including with local authorities. Furthermore, Airport Master Plans should contain <u>sufficient information and drawings</u> so that they may be clearly understood by the lay person as well as professionals and that any additional land should be clearly identified to <u>minimise long-term uncertainty and non-statutory blight</u> .
			2.5 Gatwick Airport Ltd (GAL) prepared a Master Plan in 2019 ²⁴ (GAMP). The Council should expect to see the robust evidence that supports the extent of the Safeguarded Land shown in the GAMP.
			2.6 National policy contains two tests for the inclusion of safeguarding in local plans (para 106 (c)), namely that the extent of the safeguarding must be based on <u>robust</u> evidence of its need and that it must relate to infrastructure that is <u>critical</u> to the development of the infrastructure, so as to widen transport choice and realise opportunities for large scale development. The above tests are particularly important for the future of Crawley given the historic conflict between providing for unmet employment needs and safeguarding land for airport infrastructure. The NPPF is clear that any inclusion of safeguarding policies in a Local Plan is, in the first instance, a matter for the local plan-making authority to consider and justify. In the context of the policy and guidance contained in the NPPF and the APF, the need for any land to be safeguarded must be tested through the plan-making process.
			2.7 Any safeguarding must, therefore, be justified by robust evidence of need and the area should be no bigger than that which is critical to serve the purpose of the scheme, i.e. related to required operational airport infrastructure. GGL has long made the case that there is no justification for safeguarding all the land to the east of Balcombe Road as shown on Plan 21 of the GAMP (Appendix 2) for surface car parking as indicated on Plan 20 of the GAMP (Appendix 3). Safeguarding of the Site owned by GGL

²³ The Aviation Policy Framework, DfT, March 2013

²⁴ Gatwick Airport Master Plan 2019, Gatwick Airport Ltd, July 2019

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			<p>and comprising the Gatwick Green allocation is not considered to be justified by any 'robust' evidence in the GAMP. The GAMP does not establish that the Gatwick Green land is 'critical' to serving the purpose of delivering an additional wide-spaced runway. The Council should expect to find the 'robust' evidence for the extent of safeguarding in the GAMP but, in relation to the significant provision for surface airport-related car parking, no such evidence is presented. The Council were therefore right to conclude that the case for safeguarding all the land east of Balcombe Road had not been made. No other evidence to explain and justify the extent of current safeguarding has been seen.</p> <p>2.8 Land east of Balcombe Road has been blighted by safeguarding since about 2007 which has had the effect of preventing the Council from allocating a strategic employment site and meeting its identified needs within the Crawley area. Gatwick Green has been consistently promoted for employment use by GGL throughout this period with its potential acknowledged through the Area of Search (AoS) in the adopted CBLP 2015 (Policy EC1) and the Area Action Plan (AAP) in the DCBLP 2020 (proposed Policy SD3).</p> <p>The extent of safeguarding for airport car parking – planning policy considerations</p> <p>2.9 Having properly considered and applied the safeguarding policy tests set out above, the Council has responded positively to the long-standing need for strategic employment land by allocating Gatwick Green for strategic employment development under Strategic Policies EC1 and EC4. The DCBLP therefore includes an area of Safeguarded Land for a future additional wide-spaced runway at Gatwick Airport, but with 44 ha of previously Safeguarded Land excluded, to accommodate an industrial-led Strategic Employment Location known as Gatwick Green.</p> <p>2.10 The Council sets out its approach to planning for Gatwick Airport in Topic Paper 2²⁵ - in addition to addressing the future needs of the airport, it sets out the strategy to bring forward new employment land/floorspace through the allocation of Gatwick Green, cross-referencing its economic evidence contained in Topic Paper 5²⁶. Taking account of the Inspector's advice at the Advisory Visit in April 2020, the Council considered the extent of safeguarding rather than the principle of it. In doing so, it took account of the long-standing constraint safeguarding has imposed on the Borough's land supply; the findings on the need for more employment land contained in the Economic Growth Assessment Supplementary Update for Crawley (EGA SU)²⁷ and Topic Paper 5, and the need to accommodate a Strategic Employment Location (SEL) at Gatwick Green (Topic Paper 2, para 2.3.4 and Section 3.5). The DCBLP therefore retained safeguarding, based on an amended land take, enabling a SEL to be</p>

²⁵ Topic Paper 2: Gatwick Airport, Crawley Borough Council, May 2023

²⁶ Topic Paper 5: Employment Needs and Land Supply, Crawley Borough Council, May 2023

²⁷ Northern West Sussex Economic Growth Assessment, Supplementary Update for Crawley, Final Report, Crawley Borough Council, January 2023

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			<p>allocated whilst safeguarding from development the land that would be required to accommodate a possible southern runway and associated infrastructure (para 3.5.1).</p> <p>2.11 Savills' assessment of the future need for Industrial and Logistics (I&L) land (Savills Market Demand Forecast report)²⁸ provides a forecast of the future need for I&L land based on a market demand analysis. This builds on the Council's econometric forecasts, the limitations of which are noted in Savills Market Demand Forecast report. This assessment concludes that the future demand for I&L land is 69 ha to 2040, not the 22.9 ha in the EGA SU.</p> <p>2.12 Topic Paper 2 went on to conclude that the land to be allocated for Gatwick Green was not needed for the runway or related highway connections, but only for a large area of surface car parking. In light of the evidence, the proposed extent of surface car parking east of Balcombe Road (c 92 ha or 227 acres) did not represent an efficient use of land given that there are more land-efficient approaches. These include decked and robotic parking, which the airport is already adopting and which are in line with the airport's Surface Access Strategy (para 3.5.1).</p> <p>2.13 The evidence, therefore, supports the Council's decision to remove some of the historically Safeguarded Land (indicated as surface airport-related car parking related to a future additional wide-spaced runway), to allow the allocation of Gatwick Green. The Council's decision is based on the conclusion that surface parking does not represent an efficient use of this land given proposals by GAL for more land-efficient car parking and sustainable surface access.</p> <p>2.14 GAL is already planning more land-efficient parking solutions. It is promulgating a Development Consent Order (DCO) for the continuous use of the emergency runway, which includes decked parking arrangements to free up land for other critical land uses to enable capacity to be increased from c 50 mppa (million passengers per annum) to c 80 mppa, an increase in capacity of 60%.</p> <p>2.15 In addition to the long-standing unmet need for employment land, the Council is still aware of the need to address the residual effects of the COVID-19 pandemic, which exposed a lack of resilience in Crawley's economy due to structural difficulties. At the end of 2021, CBC issued "One Town" Crawley's Economic Recovery Plan²⁹ which provides a vision for Crawley's future socio-economic prosperity. The 'one town' vision centred on a green growth economy delivered through, <i>inter alia</i>, <u>a new site to help boost jobs for residents</u>; tackling <u>long term</u> structural economic challenges by attracting business investment and <u>addressing the limited supply of employment land</u>, and delivering a diverse and resilient</p>

²⁸ Appendix 2 to representation on Strategic Policy EC1 – Savills on behalf of GGL

²⁹ "One Town" Crawley's Economic Recovery Plan, Crawley Borough Council, December 2021

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			<p>economy. Crawley BC intended to employ 'flagship interventions' to achieve this, one of which would be unlocking sufficient suitable employment land to drive recovery.</p> <p>2.16 The objectives of the plan are embodied in Strategic Policies EC1 and EC4 of the DCBLP, which allocates Gatwick Green. The allocation has been made in light of long-term economic circumstances, but has gained further momentum to address the structural difficulties exposed by the COVID-19 pandemic. The approach also recognises that retaining the Site for possible long term airport-related surface car parking would represent "<i>an inefficient use of the land</i>" in the context of:</p> <ul style="list-style-type: none"> a. The Airport's plans for decked and robotic parking to serve its short-term expansion plans under its planned Development Consent Order (DCO)³⁰. b. The increasing switch to more sustainable modes of transport under its Surface Access Strategy (para 3.5.1, Topic Paper 2: Gatwick Airport, May 2023). <p>2.17 As previously stated, there is neither a critical need for, nor any robust evidence to support, the continued safeguarding of Gatwick Green for additional airport-related car parking.</p> <p>2.18 On behalf of GGL, Mott MacDonald's aviation team has undertaken a preliminary assessment of the need for airport-related surface long-stay car parking to serve the future additional wide-spaced runway at Gatwick Airport. The assessment considers whether there is a likely to be a need for 44 ha of airport-related surface car parking which would be lost to Gatwick Green, together with alternative approaches to accommodating future parking requirements – the assessment is contained in Appendix 4. The purpose of this work is to test the Council's assessment that the land in question would represent "<i>an inefficient use of the land</i>" when set against the context of the Airport's stated plans for decked parking, robotic parking, and higher yielding and more land-efficient valet parking products, along with the success already achieved in increasing use of more sustainable modes of transport.</p> <p>2.19 The conclusion of the assessment is that it is very unlikely that there will be a need for the scale of surface car parking that would be displaced by Gatwick Green, and that any unmet need could be comfortably accommodated through alternative, more efficient parking solutions, both within the existing operational area and the remaining Safeguarded Land east of Balcombe Road, identified under Policy GAT2. As GAL is implementing and planning for alternative intensive parking solutions, as part of its DCO Northern Runway Project proposals, the full extent of land safeguarded for additional surface car parking will not be required in the future. The continued sterilisation of Gatwick Green for future car</p>

³⁰ Your London Airport, Gatwick, our northern runway: making best use of Gatwick | Environmental Impact Assessment Scoping Report Volume 1: Main Text, GAL, September 2019 (paras 4.36 and 5.2.42)

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			<p>parking would, therefore, represent an unnecessary, inefficient and inappropriate use of a key strategic site needed to meet the clear and urgent economic needs of the Borough.</p> <p>2.20 The policy in the NPPF requires robust evidence to justify safeguarding any land, and no such evidence has been provided in the GAMP with respect to the parking areas shown over Gatwick Green. GGL considers that the Council is correct in its decision that safeguarding Gatwick Green for surface car parking represents an inefficient use of land. In terms of the policy tests in the NPPF, namely the sustainability assessment of alternatives and the tests of soundness, the use of the Site as a Strategic Employment Location (SEL) as opposed to surface car parking is wholly justified. Surface car parking is, therefore, inefficient and the alternative use as a strategic employment site is justified not only through identified existing employment land needs, but also as a result of the ongoing structural difficulties with the Crawley economy post-pandemic.</p> <p>2.21 The Council has assessed the alternative options in its Sustainability Appraisal³¹ (SA/SEA). This evaluated three options: (1) safeguarding land as shown in the GAMP, (2) do not safeguard any land, and (3) safeguard land with an amended boundary to allow for strategic employment provision. Option 3 was selected as the most sustainable option as it responded to national policy to retain safeguarding, but with an amended boundary to accommodate Crawley's unmet employment land needs in the form of a SEL at Gatwick Green. This approach enabled land south of the airport required to accommodate the physical land take of a possible wide-spaced runway and its operations to be retained. The approach is summarised in the DCBLP as the justification for allocating Gatwick Green under Policy GAT2 (para 10.21): <i>"...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."</i></p> <p>2.22 The analysis outlined above is reflected in Topic Paper 2 on Gatwick Airport</p> <p>The extent of safeguarding for airport car parking – airport masterplanning considerations</p> <p>2.23 More detailed evidence in this representation demonstrates that the Council's analysis is correct, such that there is a robust case in support of Policy GAT2 as proposed. That evidence is contained in the assessment by Mott MacDonald (Appendix 4), which can be summarised as follows:</p> <ul style="list-style-type: none"> • The Aviation Policy Framework recommends that airports continue to prepare Master Plans as a clear statement of intent so that this can be given due consideration in local planning processes.

³¹ Crawley Borough Council Local Plan Review | Sustainability Appraisal / Strategic Environmental Assessment, Draft Report, For the Submission Local Plan, January 2021

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			<ul style="list-style-type: none"> • The National Planning Policy Framework (NPPF) states that there must be 'robust evidence' to identify and protect sites and routes 'critical' to developing transport infrastructure. • An Airport Master Plan should provide the robust evidence to justify the requirements for safeguarded land for infrastructure that is critical to the expansion of the airport. • The GAMP does not include analysis or justification for the extent of the area indicated for surface long-stay car parking between Balcombe Road and the M23, instead deferring to preceding Master Plans, that also do not include these details. • Two trends have dominated car parking requirements at Gatwick Airport: (1) the significant improvement in public transport mode shift, from private cars to rail, and (2) additional car parking required to support growth in air traffic has been accommodated within existing airport owned land through intensification of parking density. GAL intends to continue both these trends to support anticipated growth over the next 15 years. • There is no robust evidence available to justify the extent of surface parking that was initially indicated over 15 years ago. The Airport Masterplan of 2019 - the apparent justification for safeguarding - was not updated to take into account the well-established and continuing trends of a shift to sustainable public transport, parking density, valet parking and more recent innovative automated parking products that are more land-efficient. • GAL's approach of safeguarding for surface parking in its Master Plan does not represent an efficient use of land given that there are more land-efficient alternatives including valet, block, decked and robotic parking. The Airport is already adopting some of these more efficient parking methods through its sustainable transport / surface access strategy, but there is no reference to these efficiencies in the plan shown for extensive surface parking for the wide-spaced runway. • The evidence supports the Council's decision to remove part of this land proposed for safeguarding for extensive surface car parking and instead allocate it for an industrial-led development to meet critical unmet needs is fully justified. <p>2.24 Consistent with these findings and foreshadowing Policy GAT2 and the allocation of Gatwick Green, paragraph 3.20 of the DCBLP 2020 stated that <i>"the indicative plans for a southern runway provided in the Gatwick Airport Masterplan show a large area for surface car parking, indicating an inefficient use of valuable land in a constrained borough with high development needs. A more consolidated approach could potentially open up opportunities for other developments"</i>. In removing Gatwick Green from safeguarding, the Council recognised not only the historic and current evidenced need for employment land release, but also the urgent need to provide economic development opportunities</p>

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			<p>2.25 In light of the above economic considerations, GGL notes the Council's approach to the principle of safeguarding and supports the general extent of Safeguarded Land under draft Policy GAT2 and as shown on the Draft Local Plan Map.</p> <p>3.0 Compatibility between highway infrastructure associated with Gatwick Green and the additional wide-spaced runway</p> <p>3.1 Between the Gatwick Green allocation and the M23 spur road is a strip of Safeguarded Land retained to accommodate highway infrastructure required for the possible additional wide-spaced runway at the Airport and owned by GGL (see plan at Appendix 1). This highway infrastructure comprises the following:</p> <ol style="list-style-type: none"> 1. Two slip roads (that merge into one) intended to connect the diverted A23 to Junction 9 on the M23, following an alignment close to the existing M23 spur road. 2. The diversion of Balcombe Road to the east to follow the M23 and to re-join the diverted A23 to the south. <p>3.2 In addition to the above, GGL intends to create highway infrastructure for the Gatwick Green site, parallel and close to the M23 spur road. The adjoining Gatwick Green allocation requires access from Balcombe Road forming an east-west access road to serve storage and distribution development: this would result in the potential for three roads to be constructed in broadly the same corridor and running parallel to the M23 spur road. This could be reduced to two roads with a more efficient approach. GGL has given consideration as to how the highway infrastructure for Gatwick Green could be accommodated within the Safeguarded Land in a more efficient manner and without prejudicing the future provision of the slip roads to serve the proposed additional runway.</p> <p>3.3 This arrangement would, therefore, ensure that the access strategy for Gatwick Green would respect the proposals for both the Gatwick DCO, based on plans shared by Gatwick Airport Limited (GAL) and the Gatwick Airport Master Plan (GAMP, 2019) and the potential wide-spaced southern runway, based on the surface access strategy (2019) published by GAL. In summary:</p> <ul style="list-style-type: none"> • Land to the north of the site has been safeguarded by Crawley Borough Council in agreement with GGL to allow for proposed roads and embankments associated with both the DCO scheme and the Southern Runway Scheme. The latter identifies a diversion of Balcombe Road to a location adjacent to and west of the M23 motorway and along the southern side of the M23 Spur. • The position of the northern access to GG does not prejudice the widening of the M23 spur over bridge proposed by GAL within the DCO. • The alignment of the northern access to Gatwick Green through the Safeguarded Land represents a resource-efficient solution that would serve both the purposes of the Gatwick Green development and a possible future wide-spaced second runway.

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			<ul style="list-style-type: none"> • The northern diversion of Balcombe Road can be accommodated within the safeguarded land designated to the north of the Gatwick Green Site allocated in the Draft Crawley Borough Local Plan. • Access through the existing (unused) Buckingham Gate to Gatwick Station and airport can be retained in both scenarios, (DCO and Southern Runway). • The Southern Runway surface access does not prejudice the delivery of a southern access into Gatwick Green from Balcombe Road. • The Gatwick Green development does not prejudice the delivery of the proposed grade separated junction as shown on the Southern Runway surface access plans and the network can be configured to retain access between the proposed car parks to the East and South of Gatwick Green. This can be achieved using existing adopted roads, notably, Balcombe Road, Fernhill Road and Antlands Lane. This is illustrated in the plan attached as Appendix 5. <p>3.4 The plan at Appendix 5 shows how these proposed arrangements would work. The arrangements will ensure that (1) an access road through the Safeguarded Land would be fully compatible with the wide-spaced second runway highway proposals, and (2) the retained car parking areas to the east and south of Gatwick Green can be accessed from the existing adopted roads in the area. GGL</p> <p>3.5 To avoid a land and resource-inefficient outcome, the Gatwick Green access road has been designed to coincide with a logical alignment of a diverted Balcombe Road within the Safeguarded Land. This could, in the future, form part of the diverted Balcombe Road and be upgraded and extended, as required by GAL. The M23 slip roads could also be accommodated within the identified Safeguarded Land.</p> <p>3.6 The accommodation of these highway requirements has been discussed with GAL, with a view to reaching an agreement that these arrangements meet the needs of both parties. Periodic engagement with GAL has identified matters which may usefully be resolved prior to the Examination of the DCBLP.</p> <p>3.7 In the absence of an agreement with GAL, GGL is clear that the proposed arrangements are technically feasible and viable from a transport planning and highways perspective. GGL considers that these arrangements represent pragmatic, workable and resource and land-efficient solutions which should be embodied into policy in the DCBLP. It allows GGL to utilise the land it owns in the most efficient manner, whilst not prejudicing the Airport's long term access plans. Further, it avoids the duplication of roads, thereby reducing the carbon footprint of the proposals, provides room for additional landscaping (as a buffer to the M23 spur) and would assist in reducing the cost of the future Airport highway infrastructure to the benefit of GAL.</p>

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			<p>3.8 These arrangements can be accommodated via a minor change to Policy GAT2 in the DCBLP, namely a policy response to facilitate the dual use of the Safeguarded Land in this area – details are set out later in this representation.</p> <p>3.9 This change to the policy is being promoted by GGL and will require adjustments to Policy GAT2 in the DCBLP to allow for this logical, sustainable and resource-efficient solution.</p> <p>3.10 The technical assessment by Mott MacDonald (Appendix 4) also addresses the wider compatibility between Gatwick Green and the proposed additional wide-spaced runway and related infrastructure. The assessments conclude that the Gatwick Green allocation is considered to be compatible with the future development of the airport for the following reasons:</p> <ul style="list-style-type: none"> • It would not block or prevent any critical infrastructure (such as runways, railways or terminal buildings) that are required to safeguard for an additional wide-spaced runway to the south of the existing airport. • It would not hinder sustainable aviation growth at Gatwick Airport and is therefore fully compatible with any policy requirement to safeguard land for future national requirements. • The site can be developed to be fully compliant with the land use requirements for PSZs³², as described in the DfT’s Circular ‘Control of Development in Airport Public Safety Zones’ published in March 2010. • Gatwick Green can be designed so as to be fully compliant with all other aspects of Aerodrome Safeguarding that need to be considered to protect flight safety from the airport, i.e. in relation to heights of all buildings, bird strike hazard, cranes, lasers, glare and confusing patterns of lights. These will be taken into account and continue to be addressed as the scheme is developed through its design lifecycle. • Gatwick Green would be compatible with the Airport’s short-term expansion plans for the use of the standby runway under GAL’s proposed DCO application. <p style="text-align: center;">Discussions between GGL and GAL</p> <p>3.11 GGL and GAL held discussions relating to access to Gatwick Green and safeguarding for the delivery of a wide-spaced second runway to the south of Gatwick. The engagement took place over 2020-2021 and focused on the interface between the two projects, but GAL did not want to continue in relation to any detail. It was hoped that a Statement of Common Ground (SoCG) could be achieved, but no substantive agreement was reached between the parties. A brief statement setting out an agreed</p>

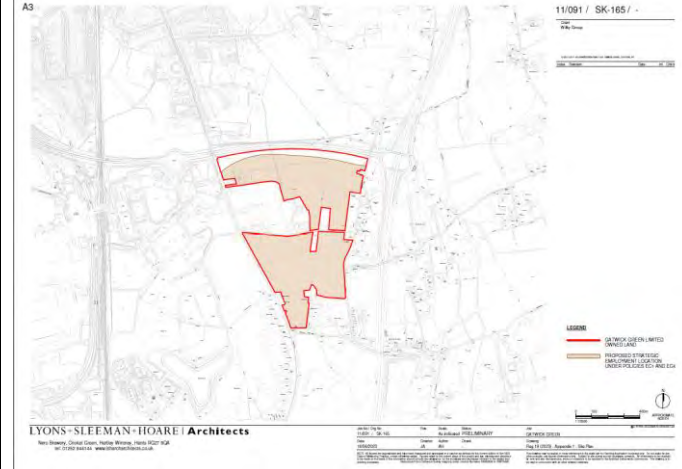
³² Public Safety Zones relating to operational airport runways

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position is contained at **Appendix 6**. GGL will be re-engaging with GAL with the intention of achieving a SoCG prior to the DCBLP Examination.

Appendix 1: Site Plan



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			<p>Appendix 2: Plan 21 rom Gatwick Airport Master Plan, 2019</p>  <p>© Copyright Airports Co. UK All rights reserved. No part of this document may be reproduced without the prior written permission of Airports Co. UK Copyright and Address rights. License No. 10000000</p> <p>PLAN 21 - Safeguarded land Additional Runway</p> <p> — Safeguarded Land — Additional Runway — Land Currently Subsequently For The Additional Runway — Airport Boundary </p> <p>Appendix 3: Plan 20 from Gatwick Airport Master Plan, 2019</p>  <p> 1 Area Terminal Building 2 Control Tower 3 Access Pad 4 New CAT Control Tower 5 Offices 6 Control 7 Private Motor System 8 Research Laboratories 9 New Access 10 New Access 11 New Access 12 New Access 13 New Access 14 New Access 15 New Access 16 New Access 17 New Access 18 New Access 19 New Access 20 New Access 21 New Access </p> <p>PLAN 20 - Airport Layout Additional Runway</p>


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			<p>Appendix 4: Gatwick Green Safeguarding – Mott MacDonald</p> <p>1 Introduction</p> <p>1. Crawley Borough Council released the Draft Crawley Borough Local Plan (DCBLP / Plan) for Reg19 consultation from 9th May 2023 for six weeks. This follows a consultation from 6 January 2021 for responses by 30 June 2021 on an earlier draft of this Local Plan.</p> <p>2. This statement forms an appendix to representations by Savills on behalf of Gatwick Green Limited (GGL) to Policy GAT2 (Safeguarded Land), which relates to (1) land designated in the Plan as safeguarded for the potential future development of an additional wide-spaced southern runway for Gatwick Airport, and (2) the deletion of land previously safeguarded to accommodate the allocation of Gatwick Green as a comprehensive industrial-led development of predominantly storage and distribution uses.</p> <p>3. Gatwick Airport Limited (GAL) submitted an objection to this Strategic Employment Allocation at Gatwick Green (Policy EC4) in response to the 2021 consultation, with supporting Annexes drafted by RPS relating to the employment land allocation, and Arup relating to land safeguarding (Policy GAT2) and transport modelling.</p> <p>4. In this statement, Section 2 provides an Executive Summary. Section 3 addresses the importance of Airport Master Plans and what they should contain, given they are required for land-use planning purposes. Section 4 assess the need for, and alternatives to, the land safeguarded for airport car parking related to a potential future wide-spaced southern runway. This section also includes a review of the Reg 19 submission by Gatwick Airport in response to the 2021 consultation on the draft local plan. Section 5 summarises these points. Section 6 provides overall conclusions.</p> <p>5. This appendix has been prepared by Mott MacDonald's airport planning team, supported by transport planners who specialise in airport surface access within an Integrated Transport Division. Both the airport and transport planning teams are very experienced in providing airport masterplans and surface access strategies to airports of all sizes. They operate in a global market and have a track record of working for some of the busiest and most complex international hub airports. This includes providing both airport and transport planning services to Singapore Changi Airport, New York JFK Airport and London Heathrow Airport on major airport masterplans and new terminal development projects within the last 5 years.</p> <p>2 Executive Summary</p> <p>6. Crawley Borough Council has published the DCBLP with an area of Safeguarded Land under Policy GAT2 for a future additional wide-spaced runway at Gatwick Airport. The Plan also allocates 44 ha of previously Safeguarded Land to accommodate an industrial-led Strategic Employment Location (SEL) known as Gatwick Green to meet the long-standing unmet economic needs of the Borough.</p> <p>7. The Council set out its approach to planning for Gatwick Airport in a Topic Paper (Topic Paper 2: Gatwick Airport, January 2021). This sets out the in-principle case for safeguarding land for a future additional wide-</p>

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			<p>spaced runway but excludes the land to be allocated for Gatwick Green. This is on the grounds it is not needed for critical airport infrastructure and that no robust evidence has been presented to justify its use for a large area of surface car parking.</p> <p>8. The Aviation Policy Framework (APF, 2013) is Government policy that introduced the need for airports, as critical transport infrastructure, to provide Master Plans. These are to be based on an analysis of options and under GAL's Economic Regulation License are subject to consultation with the local community. The guidance supports the provision of a plan to show land safeguarded for these needs, which the National Planning Policy Framework (NPPF) requires is based on 'robust' evidence of the infrastructure that is 'critical' to the delivery of the expansion scheme. Master Plans form a key part of the evidence for local authorities to prepare local plans, including the designation of safeguarded land in line with national planning policy in the NPPF.</p> <p>9. Airport Master Plans are required to provide robust forecasts of passenger numbers and air transport movements and translate these into infrastructure requirements and the land needed to accommodate those. The Gatwick Airport Master Plan 2019 (GAMP) contains three plans that relate to the proposed additional wide-spaced runway (Plans 20, 21 and 22). However, in respect of the extent of long-stay car parking, these plans are not supported by the robust analysis and options development work that is required by the NPPF. The annex to the GAL objection to the 2021 draft local plan referenced the submissions to the Airport's Commission in 2014 as the source for land safeguarding for car parking. However, this source also does not contain 'robust evidence' and simply states a requirement without justification. The Council's Topic Paper is therefore supported in relation to its findings on airport related surface car parking.</p> <p>10. UK airports are all seeking to achieve an increasing rate of modal shift in passenger surface access from private vehicles to more sustainable modes of transport. These trends can be seen in increasingly ambitious mode-share targets that will continue in the context of the climate crisis. At Gatwick Airport, the share of passengers traveling to the airport by non-car modes of transport is forecast to increase from 44% in 2018, to 48% by 2022. This trend has and will continue to reduce the proportion of passengers that will require long-stay car parking. Consequently, the increase in passenger numbers over time will have a proportionally smaller effect on the need for long-stay airport car parking.</p> <p>11. There are various considerations for, and approaches to, the provision of airport-related car parking associated with an additional wide-spaced runway at Gatwick. The GAMP describes a short- to medium term future (5 to 15 years) in which, consistent with these trends and other considerations, there is proportionally less land identified for airport-related long-stay car parking. This is being achieved through greater modal shift to public transport and denser (more land-efficient) car parking products that are common at UK airports.</p> <p>12. In contrast, the approach to safeguarding for the long-term future additional wide-spaced runway in the GAMP inconsistently reverts to largely conventional surface car parking, that does not acknowledge the trends</p>

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			<p>in modal shift and recent parking intensification projects that have already been, or are planned to be, undertaken. The approach of safeguarding this land for surface parking does not therefore represent an efficient use of land given that there are more compact alternatives though decked and robotic parking, which the airport is already adopting, and are in line with the Airport's Surface Access Strategy.</p> <p>13. The GAMP (and earlier submissions to the Airports Commission) contain no robust evidence to justify the extent of land safeguarded for surface car parking, in terms of either demand or design solutions. Given this lack of evidence, the increasing use of alternative modes of surface access and the emerging alternatives to traditional surface car parking, the land occupied by Gatwick Green is not considered to be critical to the delivery of an additional wide-spaced southern runway. No additional evidence to justify the current extent of safeguarding has been seen.</p> <p>14. The GAMP is GAL's public position on airport expansion and safeguarding for future expansion, required under Government policy. It is therefore reasonable for any public authority to expect the GAMP to justify future land use requirements and policy. In this regard, the GAMP falls short of fulfilling these requirements and accordingly the Council has allocated some of the surface parking area for critical economic infrastructure.</p> <p>15. In relation to Aerodrome Safeguarding, Gatwick Green is fully compatible with the requirements to protect flight safety from inappropriate developments and protecting third party risk in accordance with DfT Public Safety Zones.</p> <p>16. In the context of the Airport's proposed Development Consent Order (DCO) application for short-medium term expansion using the emergency ('Northern') runway to grow the airport capacity to 70 million passengers per annum (MPPA) by 2032 (GAMP) and up to 74 MPPA by 2038 (EIA Scoping Report), Gatwick Green is fully compatible with these plans and no concerns have been raised by GAL in its discussions with GGL. This compatibility also applies in the event the airport expands to 80 MPPA as envisaged in GAL's DCO summer 2022 consultation document (para 1.1.8).</p> <p>17. Safeguarding considerations associated with highway access to an expanded Gatwick Airport, including additional slip roads from the M23, the diversion of the A23 and access to retained safeguarded longstay parking areas are addressed in the representation by Savills on behalf of GGL on Policy GAT2 and in Appendix 5 to that representation.</p> <p>18. Overall, this appendix demonstrates that the development of Gatwick Green would be fully compatible with safeguarding for the development of an additional wide-spaced southern runway (and associated critical infrastructure) and would not hinder the sustainable growth of Gatwick Airport.</p>

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			<p>3 Airport Master Plans: purpose and scope</p> <p>19. The Aviation Policy Framework (APF, 2013) provides current Government policy on aviation. The APF notes that the Government recommends that airports continue to prepare Master Plans as a clear statement of intent regarding the future development of an airport so that this can be given due consideration in local planning purposes. Guidance on Airport Master Plans is now contained in the APF, which recommends that the more ground covered and more extensive the consultation, the greater its value in informing future land use, transport and economic planning processes. Airport Master Plans are therefore the key document that should justify the extent of safeguarded land for future expansion.</p> <p>20. The APF states that whilst Master Plans are not expected to contain detailed engineering drawings, they should “...<i>contain sufficient information, including drawings where appropriate, so that they may be clearly understood by the lay person as well as professionals.</i>”. The APF goes on to state that where long-term land requirements for future development need to be identified, the “...<i>additional land and property involved, including those associated with PSZs and safety surfaces, should be clearly identified to minimise long-term uncertainty and non-statutory blight</i>”. It is therefore clear that Airport Master Plans are expected to be prepared as the basis for longer term land-use planning (para B.1), and that any safeguarded land should minimise long term blight (para B.5).</p> <p>21. Past and current aviation policy envisages several pre-requisites for Airport Master Plans: (1) to be based on detailed analysis and planning work, (2) to contain sufficient information, and (3) that such land should minimise long-term uncertainty and blight.</p> <p>22. National planning policy contained in the National Planning Policy Framework (NPPF) adds further important advice on the scope and depth of evidence needed to justify the safeguarding of land for airport expansion. Airport Masterplans are a key evidence source for addressing the requirements of national planning policy. The NPPF states that planning policies should “<i>identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development; ...</i>” (para 104(c)). This advice is replicated in the APF (para 5.8).</p> <p>23. It is therefore important to consider the Gatwick Airport Master Plan and examine whether it contains the robust evidence necessary, including analysis into future demand needs, options development, evaluation and selection to justify the extent of land required to accommodate infrastructure that is critical to the expansion proposals. Safeguarding is not justified unless such robust evidence and clear justification is demonstrated.</p> <p>24. Similarly, the Annex to GAL’s objection to the 2021 draft local plan is also reviewed in the following section to determine whether it, in turn, includes ‘robust evidence’ to justify the extent of safeguarded land.</p>

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			<p>25. It should be noted that the GAL representations include the statement that all of the safeguarded land should be treated as a single entity. This disregards the important point of 'criticality'. The land safeguarded for the second wide-space runway is location dependent, as the separation from the existing runway is necessary to comply with aeronautical regulations for independent parallel runway operations and the expanded facilities must connect to and integrate with existing airfield infrastructure.</p> <p>26. The same principle does not apply to long-stay car-parking, which is not location 'critical'. It is therefore an over-simplification to treat the safeguarded land a single entity, recognising that it includes different land-uses with varying levels of importance to airport expansion.</p> <p>4 Airport – Safeguarded Land 4.1 Policy Context – GAT2: Safeguarded Land</p> <p>27. The DCBLP includes a chapter relating to Gatwick Airport, including Policy GAT 2, addressing land safeguarding for a second wide-spaced runway as shown in Figure 4-1 below.</p>  <p>Figure 4-1. Extract from DCBLP showing proposed safeguarding area</p> <p>28. This is supported by Topic Paper 2 relating to Gatwick Airport, which provides further context regarding aviation safeguarding policy, referencing the national Aviation Policy Framework (APF, 2013) and the National Planning Policy Framework (NPPF, 2019).</p> <p>29. The DCBLP excludes the Gatwick Green employment site from the safeguarded area, which is shown in Figure 4-1 and justified in the supporting text to Policy GAT2 and in Topic Paper 2. The approach is justified</p>

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			<p>by the need to meet Crawley's economic needs and that surface airport car parking does not represent an efficient use of the land given the availability of more land-efficient parking options, such as decked and robotic parking (para 3.4.1, Topic Paper 2).</p> <p>30. The policy framework for safeguarding land outside airports that may be required for future airport development is noted in the main representation on Policy GAT2 by Savills. This appendix focuses on assessing compliance with the NPPF based on the evidence in the GAMP, which is the key document where safeguarding needs would be expected to be set out and justified.</p> <p>31. As GAL's representation to the 2021 DCBLP includes a reference back to the 2014 submission to the Airports Commission, this earlier document has also been reviewed to determine whether it provides robust evidence, on which the more recent GAMP is based.</p> <p>32. The NPPF (2019) notes that the means of protecting land for future airport expansion is via Local Plans. As noted at paragraph 19, it is required that in planning for such protection, land identified for future development should be based on 'robust evidence' to justify sites and routes that are 'critical' to that infrastructure.</p> <p>33. In summary, the basis for safeguarding land is Local Plans and safeguarding is not justified unless this NPPF test for 'robust' evidence and clear justification as to the 'critical' need for infrastructure and extent of land is demonstrated.</p> <p>4.2 Gatwick Green Development</p> <p>34. The Gatwick Green development proposes to provide a comprehensive industrial-led development of predominantly storage and distribution uses in an area of land to the east of Balcombe Road (Figure 4-2). The DCBLP states that, "<i>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</i>". This is on the grounds that "<i>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.</i>"</p>

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Figure 4-2. Extract from Draft Local Plan showing Strategic Employment Location



4.3 Gatwick Airport Master Plan(s)

4.3.1 Current Gatwick Airport Master Plan (2019)

35. Gatwick Airport Limited (GAL) published its most recent Gatwick Airport Master Plan in 2019 (GAMP). This document describes three possible future scenarios for the growth and development of the airport. Scenario 1 assumes the continuation of the existing single runway operation and indicates growth up to 61 million passengers per annum (MPPA) by 2032. Scenario 2 assumes the existing emergency ('Northern') runway, put into dependent use (for which a DCO application is underway), could add between 10 and 15 aircraft movements in peak hours, increasing capacity to 70 MPPA by 2032 (GAMP) and up to 74 MPPA by 2038 (EIA Scoping Report). Scenario 3 considers that a new wide-spaced southern runway could be delivered within approximately 10 years of starting the planning process and could take capacity up to 95 MPPA.

36. The GAMP includes clause 5.4.12 regarding southern runway safeguarding that states, "The area of land currently safeguard for the additional runway was based on a much earlier scheme developed by the previous airport owners, BAA. This currently safeguarded area is illustrated in Plan 21." **Figure 4-3** reproduces the GAMP Safeguarded Land. **Figure 4-4** reproduces the conceptual Airport Layout within the Safeguarded Land. It seems apparent that Figure 4-4 illustratively indicates extensive areas of surface parking to the East of the railway and the new access route to the new terminal.

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			 <p>PLAN 21 - Safeguarded land Additional Runway</p> <p>Figure 4-3. Safeguarded Land Extract from Gatwick Airport Master Plan 2019</p>  <p>PLAN 20 - Airport Layout Additional Runway</p> <p>Figure 4-4. Airport Layout Extract from Gatwick Airport Master Plan 2019</p> <p>37. The landside transport section of the GAMP (published in 2019) summarises and is based on the preceding Airport Surface Access Strategy (ASAS), published in 2018. The ASAS includes information relating to car-parking provisions and public transport mode share (see section 4.5 below), which includes their ever increasing sustainable transport targets. However, the ASAS does not indicate how these might affect the</p>

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			<p>amount of land that may be needed in the future to accommodate car parking related to the decreasing proportion of passengers that will travel to the airport by private car.</p> <p>38. GAL has initiated a DCO process related to plans to put the Emergency ('Northern') Runway into continuous operational use. The government site for National Infrastructure Planning indicates that EIA scoping reports were submitted in September 2019. The scoping report indicates that GAL is pursuing Scenario 2 (emergency runway use), and not actively pursuing Scenario 3 (additional wide-spaced runway) but, nevertheless, GAL considers it in the national interest for land to continue to be safeguarded.</p> <p>39. A Preliminary Environmental Information Report (PEIR) relating to this DCO was submitted in September 2021. This revised the forecast traffic increase to 75.6 MPPA by 2038 and to 80.2 MPPA by 2047, as a basis for economic benefits projections.</p> <p>4.3.2 History of Master Plans for Gatwick Airport</p> <p>40. In justification for the extent of land safeguarded for a future additional wide-spaced runway, the GAMP refers back to earlier Master Plans in clause 5.4.12, <i>"The area of land currently safeguard for the additional runway was based on a much earlier scheme developed by the previous airport owners, BAA."</i></p> <p>41. GAL published previous Airport Master Plans in 2005 and 2012. The 2005 Master Plan states, <i>"The area required for landside airport facilities to the east of the railway needs to be substantially extended, primarily for car parking and road access to the new (third) terminal."</i> and, <i>"The boundary to the east of the railway corresponds with that indicated in the White Paper."</i> The 2012 Master Plan references safeguarding for a second runway stating, <i>"The area for landside airport facilities to the east of the railway would need to be substantially extended to accommodate a transport interchange (including areas for coach parking and car rental), car parks and front line ancillary facilities such as offices and hotels."</i> It should be noted that 'front-line ancillary facilities such as offices and hotels' are not referenced in the later GAMP 2019 as part of the basis for land safeguarding. Of critical importance is that these earlier Master Plans, like the GAMP, do not provide 'robust evidence' to justify the extent of land required for safeguarding for future car-parking needs. Nor is such evidence contained in the GAL Airport Surface Access Strategy (ASAS, May 2018), which predated the GAMP.</p> <p>42. The safeguarded land associated with a wide-spaced runway originated in the Aviation White Paper (The Future of Air Transport, DfT, 2003), which has since been withdrawn. This paper did not include any justification for an extent of safeguarded land, but did state, <i>"It must be stressed that the map was only indicative, pending detailed design work and submission of a planning application by the operator. The map should not therefore be taken to be a formal safeguarding map."</i></p> <p>43. It is apparent that in all the published Airport Master Plans (2005, 2012, 2019) and also in the Airport Surface Access Strategy (2018), there is no explicit or evidenced design rationale for the extent of</p>

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			<p>safeguarded land for car parking areas associated with an additional wide-spaced runway. The high-level plans provide the only basis for the extent of safeguarding, and in respect of land for long-stay parking, there is no assessment of need, alternative options development, evaluation and selection, as would constitute a rigorous master plan process. As such, the criterion for robust evidence in the NPPF is not considered to have been met.</p> <p>44. The GAL representations to the 2021 DCBLP included an Annex that referenced, “GAL’s Second Runway Operational Efficiency Master Plan” is Appendix A5 of the Updated Scheme Design Submission (to the Airport’s Commission), issued in May 2014. While not currently available on GAL’s website, this published document contains a table describing the number of car parking spaces to be accommodated in the eastern zone. However, this document does not provide any explanation of the method by which these numbers have been derived, or the parameters on which any calculations have been based. As such, it also is not considered to provide robust evidence. The GAL representations are reviewed in more detail from Section 4.7 below.</p> <p>4.4 Gatwick Airport – Car Parking Trends</p> <p>45. The number of car parking spaces at Gatwick has been increased since the publication of the 2005 Master Plan. The projected demand for parking has also been updated with each Master Plan revision</p> <p>Table 4-1 History of Existing and Projected Demand for Car Parking at Gatwick</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2"></th> <th colspan="2">2005 Master Plan</th> <th colspan="2">2012 Master Plan</th> <th colspan="2">2019 Master Plan</th> </tr> <tr> <th>Existing</th> <th>2015 Demand Projection</th> <th>Existing</th> <th>2020 Demand Projection (40 MPPA)</th> <th>Existing</th> <th>2023 Demand Projection</th> </tr> </thead> <tbody> <tr> <td>Short-Stay</td> <td></td> <td>4,100</td> <td>4,720</td> <td>4,960</td> <td>6,500</td> <td>4,902</td> <td>9,402</td> </tr> <tr> <td rowspan="3">Long-Stay (inc. Valet and 'holiday')</td> <td>On Airport</td> <td>27,134</td> <td>30,000</td> <td>26,655</td> <td>30,000</td> <td>34,096</td> <td>39,163</td> </tr> <tr> <td>Off Airport Approved</td> <td>21,350</td> <td>21,350</td> <td>-</td> <td>-</td> <td>21,200</td> <td>21,200</td> </tr> <tr> <td>Un-approved</td> <td>2,400</td> <td>-</td> <td>5,800</td> <td>Decreased</td> <td>-</td> <td>-</td> </tr> <tr> <td></td> <td>Sub-total</td> <td>50,862</td> <td>51,350</td> <td>-</td> <td>-</td> <td>55,296</td> <td>60,363</td> </tr> <tr> <td>Staff</td> <td></td> <td>-</td> <td>10,000</td> <td>7,000</td> <td>-</td> <td>6,200</td> <td>6,200</td> </tr> <tr> <td>TOTAL</td> <td></td> <td>54,962 (exc. Staff)</td> <td>66,070</td> <td>33,815 (exc. staff & off-airport)</td> <td>+6,000 by 2020</td> <td>60,200</td> <td>69,765</td> </tr> </tbody> </table> <p>46. The previous Master Plans show a trend of increasing parking provision to support growth in air-traffic. This is summarised in the GAMP as a growth of 19.5% from 32,640 public spaces in summer 2010 to 39,000 spaces in summer 2017. Unapproved off-airport parking has been reduced (in line with GAL and CBC policy), while more intensified car parking arrangements have been accommodated within the Airport’s operational area.</p> <p>47. It should be noted that ‘Off Airport Approved’ has been maintained consistently at slightly over 21,000 spaces throughout these masterplans and their forward demand projections. Only the 2005 masterplan</p>			2005 Master Plan		2012 Master Plan		2019 Master Plan		Existing	2015 Demand Projection	Existing	2020 Demand Projection (40 MPPA)	Existing	2023 Demand Projection	Short-Stay		4,100	4,720	4,960	6,500	4,902	9,402	Long-Stay (inc. Valet and 'holiday')	On Airport	27,134	30,000	26,655	30,000	34,096	39,163	Off Airport Approved	21,350	21,350	-	-	21,200	21,200	Un-approved	2,400	-	5,800	Decreased	-	-		Sub-total	50,862	51,350	-	-	55,296	60,363	Staff		-	10,000	7,000	-	6,200	6,200	TOTAL		54,962 (exc. Staff)	66,070	33,815 (exc. staff & off-airport)	+6,000 by 2020	60,200	69,765
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			<p>describes these as a mixture of “a number of long-established off airport car parks, run by specialist operators (16,668 spaces), and at many hotels (4,674 spaces)”. These available ‘off airport approved’ spaces were not referenced in the 2014 submission to the Airport’s Commission, inconsistently with the published masterplans.</p> <p>48. In each case, there has been a predicted growth in demand over the following 5 to 10 years. This has been accommodated within the existing land ownership boundary through a variety of measures to intensify the parking density on the site. For example, the 2012 Master Plan stated, “<i>These additional spaces are expected to be provided by a mixture of decking and multi-storey car park construction on the site of existing surface car parks</i>”.</p> <p>49. Similarly, the GAMP describes recent and planned car parking projects that continue this intensification trend further within the next 5 years; “<i>We have recently completed a project to deck part of South Terminal’s long-stay car parking to provide an additional 1,565 spaces...</i>” and “<i>we have identified two sites for additional multi-storey car parking, one at each terminal. MSCP 7 would create approximately 3,000 spaces in a multi-storey structure on the site of a current staff car park located just to the north of North Terminal. MSCP4 at the South Terminal would create approximately 1,500 spaces...</i>”. Combined with “<i>3,500 spaces delivered by consolidation of our long-stay self-park product into one site and optimising the configuration of current storage areas</i>” these projects “<i>deliver 9,565 extra spaces throughout the period, or an increase of 24.5% from 2017 capacity</i>”. Gatwick Airport submitted their planning application for proposed MSCP 7 at North Terminal in 2022 (Planning Application Reference No: CR/2022/0707/CON).</p> <p>50. Looking forward, the GAMP indicates that the same approach would be followed for longer-term growth over the next 15 years (corresponding to a capacity range of 57 to 61 MPPA); “<i>Additional car parking, or parking required to replace existing spaces lost owing to other developments, can be provided by decking more of the long stay car parks at North and South Terminals, as required. We are also exploring the use of machine assisted parking technology in the longer term to increase the capacity and utilisation of existing car parks.</i>”</p> <p>51. The EIA scoping report for the emergency (‘Northern’) runway DCO describes that “<i>approximately 46,700 parking spaces were available in summer 2018 within the airport boundary</i>” (including staff parking) and a further 21,196 authorised spaces off-airport. Projects to increase car-parking associated with the application include, “<i>a new multi-story car parking capacity: 4,250 spaces</i>” and “<i>Use of robotics technology within existing long stay parking areas resulting in an additional 2,500 spaces</i>”. This would result in a total of 53,450 spaces on-airport. The total provision of new parking also considers; “<i>to replace existing parking spaces, lost due to development associated with the Project</i>” ... “<i>The overall net increase in car parking spaces would be approximately 17,500</i>”. Existing (green) and new parking (purple) areas are shown in</p>

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52. Figure 4-5 below.

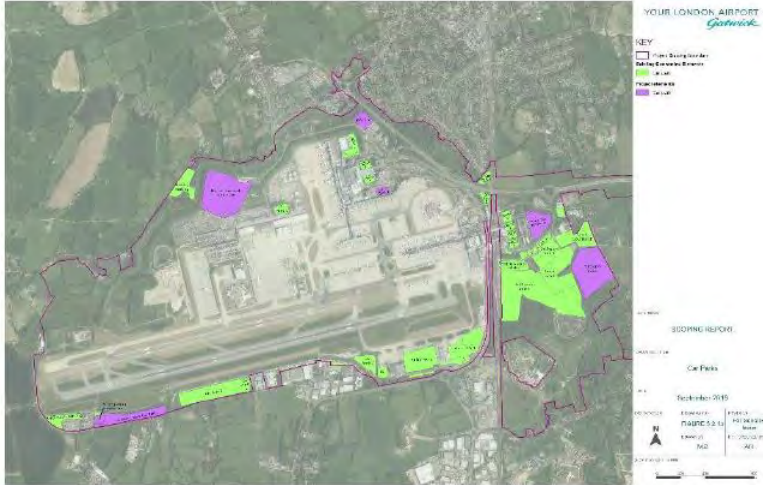


Figure 4-5. Existing and Project car-parking – EIA scoping report, Volume 2, Figures.

53. There are a number of car parking trends that should be highlighted including: the ratio of parking spaces to airport passengers and staff; the correlation with mode-share shift targets; the ratio of short-stay to long-stay parking, and the intensification of parking density through decking, MSCPs, configuration optimisation and robotic parking systems.

54. It is clear from these trends that considerable increases in car-parking provision have been achieved ranging from the 2005 Master Plan (31,234 passengers + 7,200 staff) to summer 2018 (39,000 + 6,200 staff), with a further 9,565 spaces planned (GAMP 2019) up to a total of 17,500 new and replacement (DCO EIA scoping). This has all been achieved within the existing airport boundary (with a further 22,000 authorised spaces off-airport) enabling growth from 32.8 MPPA to a throughput of 46.4 MPPA in 2018 and more than doubling to a planned capacity of 75 to 80 MPPA in the DCO PEIR in 2021.

55. The land safeguarded for a wide-spaced runway to the south was first established in the Aviation White Paper in 2003 and has been carried forward with some adjustments through Airport Master Plans to date. It is apparent that the extent of the Safeguarded Land in the GAMP has not considered the achievements described above, including the intensification of car-parking land-use within the existing airport boundary since 2005 to date and projected to continue through to 2047.

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4.5 Gatwick Airport – Sustainable Transport Mode Share

56. GAL has emphasised its commitment to a sustainable transport policy in its ASAS (2018); *“Gatwick’s commitments are to improve our public transport mode share for passengers and staff, provide sustainable travel choices and reduce the environmental impacts of surface access”* and in the GAMP, *“We expect to be held to our commitment to promote sustainable travel for our passengers and staff, and we will work with our partners and service providers to deliver safe and efficient access 24 hours a day, seven days a week”*.

Table 4-2. History of Mode Share at Gatwick

	2004	2011	2017
Private Car	51.7%	42.4%	38.6%
Hire Car	2.3%	1.8%	0.9%
Taxi	15%	13.3%	15.4%
Bus/Coach	6.8%	6.7%	5.9%
Rail	24%	35.5%	38%
Other	-	0.3%	0.2%

Source: 2005, 2012 Master Plans and 2018 ASAS, referencing CAA passenger surveys in preceding years

57. The historical trend of mode share shift towards public transport is apparent from the recent published Airport Master Plans. While taxi, bus and coach use has not altered significantly, the biggest transition is to rail (up by 15% over 13 years) and away from private cars (down by 13% in the same timeframe).

58. In 2012, it stated that of the 42.4% using private cars, *“Car parking is an essential function of the airport operation with around 22% of passengers accessing the airport by a private car, which is parked here”*.

59. This led to GAL setting targets in the GAMP to further progress this trend of mode-share shift, as shown in Figure 4-6. This has, in effect, superseded the earlier mode share targets contained in the ASAS to 2022 and noted at paragraph 34. These include rail to increase to 45% by 2030, an increase in use of bus and coach by staff and passengers, and a reduction in staff parking spaces, all corresponding to sustainable travel initiatives.



Figure 4-6. Mode share targets, extracted from GAMP 2019

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60. During the independent Airports Commission study, each of the sites made submissions to outline their proposals to deliver additional runway capacity. GAL's submissions included an indication of its plans for Surface Access that stated; "Gatwick will achieve the highest use of sustainable modes of transport: it will achieve a 60% public transport mode share for customers (46m by 2050) and a 50% sustainable mode share for staff". These were illustrated in the graphs shown in Figure 4-7 and Figure 4-8:

FIGURE 1: CHANGE IN MODE SHARE (AIR PASSENGERS)

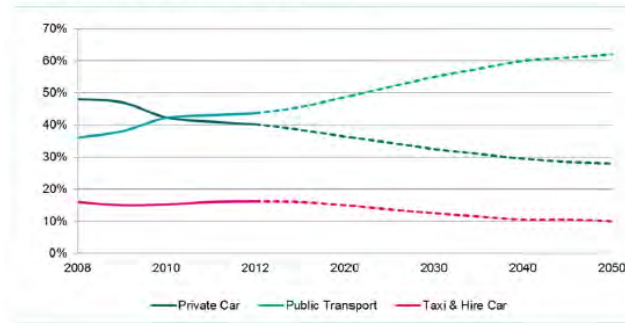


Figure 4-7. Mode share targets, extracted from SD6 Surface Access submitted to Airports Commission

FIGURE 2: CHANGE IN MODE SHARE (EMPLOYEES)

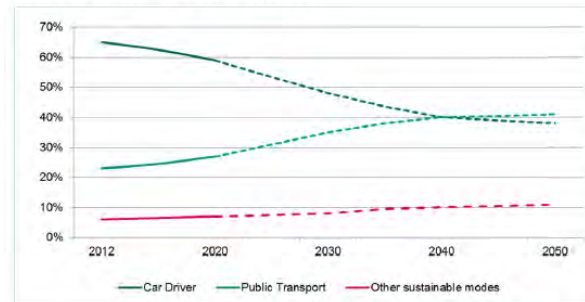




Figure 4-8. Mode share targets, extracted from SD6 Surface Access submitted to Airports

Commission

61. Significant progress has been made since 2004 in improving the public transport mode share from 31% in 2004 (bus/coach and rail) to 45% in 2017 for passengers. Targets associated with the development of a wide-

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			<p>spaced runway to the south aim to continue to improve to over 60% by public transport for passengers and over 50% for staff (up from 30% in 2012). All of this contributes to a decreasing dependency on surface access by private car, (and thereby parking), by passengers and staff as a mode share percentage that offsets any growth in air-traffic.</p> <p>62. This significant change has taken place since the Aviation White Paper in 2003 and should also be considered when updating any assessment of the land area required to be safeguarded for landside infrastructure for surface access associated with an additional wide-spaced runway to the south.</p> <p>4.6 Airport Industry Trends in Car Park Intensification</p> <p>63. Airports typically cover considerable land areas and, within landside areas, car parking is one of the significant drivers of land-use, of which, a significant proportion can be surface parking for long-stay. Airports are also in the relatively unique position of knowing, from booking systems, that many of these cars will be parked for a considerable period (from days to weeks) and when the vehicles will require to be collected/accessed. This enables unique opportunities for land-use efficiency, which have been adopted (due to valid business cases) at airports around the UK. The following paragraphs note some examples of this.</p> <p>64. Block parking is a system by which vehicles, that do not need to be accessed for a finite period, can be arranged in a dense grid, without the need for circulation roadways (that can accommodate shuttle buses) that are typical of surface parking. This is often used for valet products and could also be applied to long-stay car parks with appropriate management. Figure 4-9 shows an example from Manchester Airport.</p>  <p>Figure 4-9. Example of block parking at Manchester Airport, UK</p>

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			<p>65. Robotic parking is a further evolution of block parking. This approach uses robots to position cars in a grid array in a similar fashion to block parking. However, because there is not a valet driver who needs to exit the vehicle by opening the doors, it is possible to arrange cars with a smaller gap between adjacent vehicles. The robotic technology has been developed and has been trialled at Charles de Gaul Airport in Paris and also at Gatwick Airport, which Stanley Robotics reports to achieve 50% more vehicles within the same area relative to conventional surface parking.</p> <p>Figure 4-10 shows an example image</p>  <p>Figure 4-10. Example of robotic parking</p> <p>66. Decker car-parking provides a low-cost, light-weight structural solution that typically allows for an increase in parking density by creating a relatively easily accessible second level of parking, roughly doubling the number of cars that can be accommodated each area. Examples of this type of light weight decking solution are available at Gatwick in their long-stay parking and at Heathrow by Purple Parking.</p> <p>67. Multi-storey car parks offer the greatest number of vehicles in a given area. They are typically used for short-stay applications at airports where space and land-value are at a premium. However, this is not universally the case. An important and clearly relevant case study can be seen in the Heathrow public consultation documents that were available during preparations for the 3rd runway DCO application. In this case, the northern and western 'parkways' were proposed as multi-storey long-stay car parks, in the context where additional land was to be obtained through Compulsory Purchase Orders to enable the development of a new runway and associated infrastructure. While multi-storey car parks have a higher capital cost than surface car parks, they clearly reduce the amount of land that is required for long-stay car-parking. Figure 4-11 shows location options considered for these long-stay 'parkways'.</p>

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Figure 4-11. Sites considered for long-stay car parking in the Heathrow 3rd runway EIA scoping report

68. All these examples provide case studies of ways in which car-parking land use can be intensified in an airport context. It is also important to note that many of these options have been adopted by Gatwick Airport in the recent past and form part of its plans for future growth, including the emergency runway DCO application, while remaining within its existing operational/land-ownership boundary. These innovative and more intense parking arrangements could equally be applied to the Airport's further growth as part of its wide-spaced southern runway proposals, as opposed to surface parking.


4.7 Safeguarded Land - proposed number of car parking spaces

69. GAL's representations to the 2021 DCBLP included an Annex relating to safeguarded land (GAT 2), hereinafter referred to as 'The Annex'. It includes a reference to "GAL's *Second Runway Operational Efficiency Master Plan*", Appendix A5 of the Updated Scheme Design Submission (to the Airport's Commission), issued in May 2014. This was indicated as the basis for the extent of the land safeguarded for long-stay car-parking.

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			<p>70. Appendix A5 contains Section 3.7 relating to the Eastern area developments, referring to the land to the east of the railway line (and west of the M23). It provides the following table (Figure 4-12) describing the number of parking spaces that the safeguarding land area is based upon. The sum of long-stay, block parking and staff parking match the 95,750 spaces described in The Annex.</p> <table border="1" data-bbox="750 438 1211 627"> <thead> <tr> <th></th> <th>2050</th> </tr> </thead> <tbody> <tr> <td>Car Parking</td> <td></td> </tr> <tr> <td>Short Stay - Number of MSCP</td> <td>9</td> </tr> <tr> <td>Short Stay (spaces)</td> <td>8,500</td> </tr> <tr> <td>Long Stay (spaces)</td> <td>59,750</td> </tr> <tr> <td>Long Stay as Block parking (spaces)</td> <td>23,900</td> </tr> <tr> <td>Staff (spaces)</td> <td>12,100</td> </tr> </tbody> </table> <p>Table 3.7_1 Car Parking Provision for Eastern Zone</p> <p>71. It should be noted that this submission to the Airports Commission did not include any calculations of how these numbers of car parking spaces had been determined or any justification of the basis upon which they had been estimated. Therefore, referencing this source does not constitute 'robust evidence'.</p> <p>72. It should also be noted that this table specifically mentions that 23,900 of the 95,750 parking spaces would be 'block parking', which, as noted above, is more spatially efficient than conventional surface parking. This is not described or considered in The Annex, which would therefore over-estimate the land area required.</p> <p>73. The GAL submission to the Airports Commission was issued and published in 2014. GAL has since updated and published their Airport Surface Access Strategy (ASAS) in May 2018 and their Masterplan in 2019, but these two documents do not update the projected car-parking demand associated with a wide-spaced southern runway.</p> <p>74. As a part of DCO application to bring the emergency ('Northern') runway into operational use, GAL submitted an EIA scoping opinion in 2019 and a Preliminary Environmental Information Report (PEIR) in 2021. These updated the baseline parking numbers in line with recent development projects.</p> <p>75. It is clear from these recent published documents that the baseline parking provision has changed since the submission to the Airport's Commission in 2014, including the provision of new short-stay multi-story car parks, efficiencies in long-stay parking and innovative new initiatives in parking management and robotic automation. It is therefore likely that if the Airports Commission design calculations were to be updated, (because they are no longer accurate), they would take this new baseline into account and derive a different result, with a reduction in the number of long-stay parking spaces required. Below we discuss the implications of these recent developments on the safeguarded land assessment described in the Annex.</p>		2050	Car Parking		Short Stay - Number of MSCP	9	Short Stay (spaces)	8,500	Long Stay (spaces)	59,750	Long Stay as Block parking (spaces)	23,900	Staff (spaces)	12,100
	2050																
Car Parking																	
Short Stay - Number of MSCP	9																
Short Stay (spaces)	8,500																
Long Stay (spaces)	59,750																
Long Stay as Block parking (spaces)	23,900																
Staff (spaces)	12,100																

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			<p>76. The GAL submission to the Airports Commission indicated that the short stay parking provision of 5,000 spaces (in 2014) would only increase to a total of 8,500 spaces, (in table 3.7 above), to support the third terminal associated with the wide-spaced southern runway. Figure 4-13 below shows a further four proposed MSCPs immediately adjacent to the new terminal building, which would provide these additional 3,500 short stay parking spaces.</p>  <p>The figure is a site plan of Gatwick Airport. It shows the layout of the airport including runways, taxiways, and terminal buildings. A legend in the bottom right corner identifies three types of locations: 'Existing MSCP' (blue squares), 'Proposed MSCP' (teal squares), and 'Proposed Car Rentals' (orange squares). The plan shows several existing MSCPs and four proposed MSCPs located near the terminal buildings. Proposed car rental locations are also marked near the terminal area.</p> <p>Figure 4-13. Additional short stay MSCPs (GAL submission to Airport Commission, 2014)</p> <p>77. Conversely, the ASAS, GAMP and DCO application indicate that current development projects (MSCP4 and MSCP 7) will increase short-stay associated with the two existing terminals to over 9,000 spaces (as opposed to 5000 spaces in 2014), increasing the baseline by 4,000 spaced, and that this could continue to grow further to support the additional traffic enabled by the use of the northern runway.</p> <p>78. As the total parking demand is a constant, determined by passenger numbers and mode share, then this over-provision of short-stay parking (on existing airport land) will offset the future requirements for longstay parking (in the Eastern area), if a wide spaced southern runway were developed.</p> <p>79. The PEIR includes a projection of long-stay parking demand associated with the growth in air traffic to 75.6 MPPA (million passengers per annum) in 2038, enabled by the use of the existing northern runway. This</p>

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			<p>increases long-stay parking to only 57,798 spaces and retains current staff parking levels at 6,200 spaces. As an efficiency metric, this equates to less than 850 spaces per MPPA.</p> <p>80. When compared to the submission to the Airports Commission in 2014, the 95,750 spaces, (which comprised 83,650 long-stay and 12,100 staff parking), related to 95 MPPA, gives an efficiency metric of over 1000 spaces per MPPA. On this pro-rata basis, it is clear that current requirements (PEIR in 2021) are considerably more efficient in terms of long-stay and staff parking demand than was assumed in 2014.</p> <p>81. This is significant for two reasons. Firstly, it is reflective of the ongoing trend shifting towards public transport mode share. GAL is actively pursuing this shift in travel behaviour as described in their recent ASAS (2018) and Masterplan (2019).</p> <p>82. Secondly, the staff parking allowance of 12,100 spaces (from table 3.7 above) is almost double the 6,200 spaces today. Conversely, however, in the DCO PEIR, the staff parking is retained at 6,200 spaces, despite increases in MPPA, indicating a significant staff mode share shift. This is also very different from trends at other airports aiming to reduce the proportion of staff parking, as their mode share choices are easier to influence than passengers. For example, the Heathrow 3rd Runway DCO application described staff parking reducing from 24,800 spaces in 2016 to 12,100 spaces by 2040 – a reduction to under 50%, despite higher MPPA. It is clear that the staff parking provision used in The Annex is un-realistic and would be considerably lower if it were updated today, as demonstrated by the DCO consultation documents.</p> <p>83. The other, very significant, omission from the 2014 submission to the Airports Commission is that it does not mention 'Off Airport Approved' parking. These spaces have been included in the categories of longstay parking supply in each of the published masterplans, surface access strategies and the DCO submissions, from 2005 to date. The quantum of 'Off-Airport Approved' spaces has been consistently 21,200 spaces, contributing to the long-stay total. These are provided at hotels that support Gatwick Airport and by long established specialist operators, as described above. There is no indication that these companies would cease to provide this service in the event of the development of a wide-spaced southern runway. Therefore, it must be assumed that the 21,200 approved spaces would continue to be provided 'Off Airport', rather than within the Eastern area development.</p> <p>84. The full beneficial impact of some of the points raised above cannot be quantified without undertaking a full surface access study associated with a future wide-spaced southern runway, updated from 2014, to take into account trends such as mode share shift.</p> <p>85. However, even without this level of analysis, it is clear that the figure of 95,750 spaces used in The Annex is a clear over-estimate of demand that does not take into account a number of the quantifiable points raised above. The existing provision of additional short-stay MSCPs since 2014 (creating a total of 9,400 in the GAMP) and future short-stay MSCPs for a new terminal (adding a further 3,500) would account for 12,900</p>

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			<p>spaces rather than the 8,500 described in table 3.7 above. As the total parking demand is constant this would offset the long-stay requirement by 4,400 spaces.</p> <p>86. The provision of 12,100 staff car parking spaces for the wide-spaced southern runway is disproportionate to the existing 6,200 spaces, as retained in the northern runway PEIR. This indicates an over-allowance of at least 4,300 spaces even taking into account pro-rata staff growth from 75.6 MPPA (northern runway) to 95 MPPA (wide-spaced southern runway).</p> <p>87. It is clear from the published masterplans that the total long-stay parking spaces includes 21,200 'Off Airport Approved'. The long-stay parking allowance of 83,650 spaces (of which 59,750 conventional and 23,900 block parking), is a higher ratio of long-stay than in the DCO PEIR and is representative of the total long-stay parking demand. As such, the requirement for the safeguarded land (eastern area) should be reduced by the 21,200 spaces 'Off Airport Approved' that are described in the published Airport Masterplans, ASAS and DCO application documents.</p> <p>88. The combined effect of these quantifiable trends alone is a reduction in demand of 29,900 spaces, comprising 4,400 short-stay, 4,300 staff parking and 21,200 off-airport approved. This would leave a residual demand east of the railway of 65,850 which is over 30% lower than the 95,750 considered in The Annex. This is summarised in table below.</p> <table border="1"> <thead> <tr> <th>Car parking spaces</th> <th>GAL representations</th> <th>Realistic</th> <th>Correction</th> <th>Basis for Correction</th> </tr> </thead> <tbody> <tr> <td>Source / basis</td> <td>(2014, Appendix 5)</td> <td>GAMP, DCO</td> <td>As described above</td> <td>Recent GAL projects, GAL published documents</td> </tr> <tr> <td>Short Stay</td> <td>8,500</td> <td>12,900</td> <td>-4,400 less long-stay</td> <td>9,400 (inc. MSCP4+ MSCP7) + 3,500 (new terminal)</td> </tr> <tr> <td>Staff Parking</td> <td>12,100</td> <td>7,791</td> <td>-4,309 less staff spaces</td> <td>6,200 x 95 / 75.6 MPPA</td> </tr> <tr> <td>Long-stay</td> <td>83,650</td> <td>79,250</td> <td>-4,400</td> <td>Over-provision of short-stay</td> </tr> <tr> <td>Block parking / Valet</td> <td>0</td> <td>23,900</td> <td>+23,900 less area</td> <td>Appendix 5, 2014</td> </tr> <tr> <td>'Off Airport Approved'</td> <td>0</td> <td>21,200</td> <td>-21,200 Off-airport</td> <td>GAMP, ASAS, DCO</td> </tr> <tr> <td>Conventional parking</td> <td>83,850</td> <td>34,150</td> <td>-49,500</td> <td>Reduced by short-stay, block parking and 'Off Airport'</td> </tr> <tr> <td>Sub-totals</td> <td>95,750 long-stay + staff, 8,500 short-stay</td> <td>87,041 long-stay + staff 12,900 short-stay</td> <td>-8,709 +4,400</td> <td>Reduced by staff, replaced by short stay</td> </tr> <tr> <td>TOTAL</td> <td>104,250 spaces</td> <td>99,941 spaces</td> <td>-4309</td> <td>Reduced by staff</td> </tr> <tr> <td>Requirement for Safeguarded Land</td> <td>95,750 spaces (of which no block)</td> <td>65,841 spaces (of which 23,900 block)</td> <td>-29,909</td> <td>Reduced by staff, short-stay and 'Off-Airport' (31%)</td> </tr> </tbody> </table>	Car parking spaces	GAL representations	Realistic	Correction	Basis for Correction	Source / basis	(2014, Appendix 5)	GAMP, DCO	As described above	Recent GAL projects, GAL published documents	Short Stay	8,500	12,900	-4,400 less long-stay	9,400 (inc. MSCP4+ MSCP7) + 3,500 (new terminal)	Staff Parking	12,100	7,791	-4,309 less staff spaces	6,200 x 95 / 75.6 MPPA	Long-stay	83,650	79,250	-4,400	Over-provision of short-stay	Block parking / Valet	0	23,900	+23,900 less area	Appendix 5, 2014	'Off Airport Approved'	0	21,200	-21,200 Off-airport	GAMP, ASAS, DCO	Conventional parking	83,850	34,150	-49,500	Reduced by short-stay, block parking and 'Off Airport'	Sub-totals	95,750 long-stay + staff, 8,500 short-stay	87,041 long-stay + staff 12,900 short-stay	-8,709 +4,400	Reduced by staff, replaced by short stay	TOTAL	104,250 spaces	99,941 spaces	-4309	Reduced by staff	Requirement for Safeguarded Land	95,750 spaces (of which no block)	65,841 spaces (of which 23,900 block)	-29,909	Reduced by staff, short-stay and 'Off-Airport' (31%)
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			<p>4.8 Safeguarded Land – areas available for parking</p> <p>89. The total area of safeguarded land available for car parking east of the railway is described in The Annex as 138 hectares, as shown in Figure 4-14 below.</p> <div data-bbox="757 411 1451 820" data-label="Figure"> </div> <p>Figure 4-14. safeguarded land available for car parking, source: GAL representations to 2021 DCBLP</p> <p>90. The safeguarded land available for car parking excluding Gatwick Green is described as 81 hectares above, a reduction of 57 hectares (from the 138 ha. described without Gatwick Green).</p> <p>91. However, the DCBLP (local plan) has allocated only 44 hectares for Gatwick Green.</p> <p>92. The discrepancy of 13 hectares (between 57 ha. difference described above and 44 ha. allocated) is partially due to an inconsistent measurement approach being applied to the two cases.</p> <p>93. Some areas of land around Gatwick Green have been discounted, which indicates that they are possibly considered too small to be effectively used for car parking. However, as they accumulate to 13 hectares of land, which is equivalent to 6,500 conventional surface parking spaces (or close to 10,000 block parking spaces), it seems inappropriate to discount these areas without first carrying out a parking design layout to test their viability.</p> <p>94. It should be noted that cars are relatively small and manoeuvrable relative to areas at this scale, which means they can effectively use narrow pieces of land, as can be seen in the other parcels of land being considered adjacent to the railway and new terminal access road.</p>


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			<p>95. It is recommended that any parking density comparisons should more accurately compare 138ha. of available land without Gatwick Green against, 94ha. of available land with 44 ha. allocated to Gatwick Green.</p> <p>96. This would be an impartial comparison, rather than applying a subjective, and potentially, over-cautious judgement to which particular areas will prove to be viable for car-parking or not. Otherwise, there is a risk that preferential perception bias is being applied that could impact the validity of the conclusions that have been reached.</p> <p>4.9 Safeguarded Land - density of car parking types</p> <p>97. The Annex provides a table 1 describing 'Typical car parking densities', based on experience at Gatwick Airport, as shown in Figure 4-15 below.</p> <p>Table 1 – Typical car parking densities</p> <table border="1" data-bbox="757 635 1397 756"> <thead> <tr> <th>Car park type</th> <th>Car park density</th> </tr> </thead> <tbody> <tr> <td>Surface level</td> <td>1 space per 20 sqm</td> </tr> <tr> <td>Single deck</td> <td>1 space per 31 sqm (15.6 sqm of ground floor area)</td> </tr> <tr> <td>MSCP</td> <td>1 space per 42 sqm (density by ground floor area subject to the number of floors)</td> </tr> </tbody> </table> <p>Figure 4-15. Typical car park densities, source: GAL representations to 2021 DCBLP.</p> <p>98. These are presented as typical rates for planning purposes, as they must allow for a range of scenarios and situations. However, the figures presented are high when compared to industry norms, particularly those for decked car-parks and multi-story car parks and will therefore over-estimate the amount of safeguarded land required.</p> <p>99. On this basis, these planning parameters have been checked for industry good practice by comparing them against benchmarks at Gatwick Airport and other comparable UK airports, to determine if they are appropriate to use as a basis for safeguarding.</p> <p>100. A parking space in UK is typically 2.4m by 4.8m to accommodate the majority of cars available. The width of aisles varies to allow more or less space for vehicle manoeuvring depending on the context and the frequency/intensity of use. Aviation industry good practice includes the provision of clearly marked pedestrian lanes for safety. A typical long stay example at Gatwick Airport has a 5.5m laneway including the footpath, resulting a depth of 15m by 2.4 for every two parking bays as shown in This translates into an area of 18 square meters (sqm.) per bay. The allowance of 1 space per 20 sqm for surface parking is considered reasonable for planning purposes (allowing for some inefficiencies due to entry and exit barriers, bus-stops, etc).</p>	Car park type	Car park density	Surface level	1 space per 20 sqm	Single deck	1 space per 31 sqm (15.6 sqm of ground floor area)	MSCP	1 space per 42 sqm (density by ground floor area subject to the number of floors)
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			<p data-bbox="719 277 1478 308">Figure 4-16. example of a typical surface long-stay car-park at Gatwick Airport</p>  <p data-bbox="719 662 2018 783">101. Theoretically a car-park with a single level of light-weight decking can achieve a maximum efficiency rating of double a surface car-park (i.e. for an average of 1 space per 20 sqm, which would be equivalent to 1 space per 10 sqm of surface area available). In practice this cannot be achieved, as there needs to be some spatial allowance for ramps, which are typically linear and space efficient.</p> <p data-bbox="719 802 2018 954">102. Decked solutions are often rectangular for structural efficiency, which results in some surface parking around the perimeter if they are located within a plot that is not rectangular. These two factors can reduce the efficiency of decked car-park solutions. A review of benchmark examples at Gatwick and Heathrow Airports indicates a range from 20 sqm/bay up to 29.5 sqm/bay, with an average of 22.5 sqm/bay, depending on the parking configuration and the number of levels provided.</p>

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			 <p data-bbox="741 699 1283 719">Figure 4-17. example of a typical decked car-park at Gatwick Airport</p> <p data-bbox="730 740 2027 863">103. It should be noted that this form of light-weight construction, (often steel frame), varies from the heavier concrete construction methods used for multi-story car-parks. However, it is not limited to a single-deck above ground level. Purple Parking, at both Heathrow and Gatwick Airports, are 3 level solutions with two levels of decking above ground, increasing their spatial efficiency.</p> <p data-bbox="730 879 2016 970">104. It can be concluded that the value of 31 sqm per bay on average used in The Annex lies outside the upper limit of the range of benchmarked examples. A figure of 25 sqm per bay would be more realistic of real world examples and can easily be exceeded by applying 3 levels and/or block parking solutions.</p> <p data-bbox="730 986 1995 1109">105. Multi-story car parks are commonly used at airports, as they provide an efficient land use and a higher density of parking provision. A range of benchmarked examples have been taken from Gatwick, Stansted, Manchester, Bristol and Heathrow Airports. They are also typically rectangular layouts, with external spiral ramps.</p> <p data-bbox="730 1125 2018 1278">106. The range of spatial efficiency varies from 24 sqm/bay up to 34 sqm/bay with an average of 30 sqm/bay. The efficiency is typically driven by the size of the car park available (with larger MSPCs being more efficient due to a better ratio of bays to ramps) and are most efficient when located within a rectangular plot of land. These examples are typically in the range of 5 to 7 stories tall (with a highest of 9 stories at Manchester Terminal 2).</p>

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			 <p data-bbox="748 651 1335 671">Figure 4-18. example of a typical multi-story car-park at Stansted Airport</p> <p data-bbox="730 694 2029 842">108. The submission to the Airports Commission in 2014 indicated that 23,900 of the long-stay parking spaces could be arranged in a block parking configuration. This is appropriate for any valet parking and for the use of the robotic parking assistance that Gatwick Airport has already successfully trialled. The improved density of block parking has not been included in Figure 4-15 above from the Annex, and has disregarded, when it should have been considered for this significant quantum of block-parking.</p> <p data-bbox="730 865 2018 954">109. The benefits of block parking are that there is less need for aisles to access each vehicle independently. By eliminating the aisles between every second row of car parking bays the space per bay improves from 18 sqm/bay to under 12 sqm/bay.</p> <p data-bbox="730 976 2007 1066">110. Robotic parking enables narrower bays, due to drivers not needing to open car doors to access the vehicle. The robotic supplier to Gatwick Airport indicates that their system also achieves an improved spatial efficiency of 50% relative to conventional parking, validating this parameter.</p> <p data-bbox="730 1088 2013 1177">111. The supplementary information to GAL's 2022 planning application for a new MSCP 7 adjacent to North Terminal indicates that robotic parking is intended to deliver an incremental 2,500 spaces within the next 5 years, indicating that this spatial efficiency solution delivers sufficient value to Gatwick Airport.</p> <p data-bbox="730 1200 2000 1289">112. It should be noted that block parking is not exclusive to surface parking. Figure 4-17 above shows an example at Gatwick Airport of a block parking arrangement being deployed in a decked car-park, combining the land-use efficiency gains of these two methods.</p>

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113. The following table indicates the density of car parking that has been found by benchmarking car parks at Gatwick Airport and comparable UK airports, including block parking. These parameters have been used to assess the required areas of safeguarded land required in Section 4.12 below.

Car Park Type	Car Park Density (space per bay)	Car Park Density (space per bay at ground level)
Surface	1 space per 20 sqm	1 space per 20 sqm
Block parking (surface)	1 space per 13 sqm	1 space per 13 sqm
Decked car park	1 space per 30 sqm (single deck, conventional layout) 1 space per 25 sqm (double deck, conventional layout)	1 space per 15 sqm. 1 space per 12.5 sqm.
Decked block parking	1 space per 20 sqm (single deck, block parking)	1 space per 10 sqm
Multi-storey car parks	1 space per 35 sqm (conventional layout)	Dependent on number of levels 1 space per 7 sqm (if 5 levels) 1 space per 5 sqm (if 7 levels)

Table 4-3: car-park densities for planning purposes from benchmarks

4.10 Height Limitation to Car Parking

114. The Annex states that, “the land west of the A23 would be limited to one deck due to aerodrome safeguarding height constraints.”

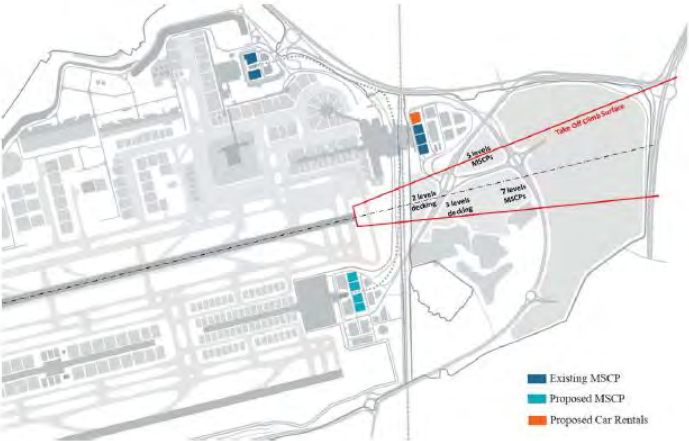
115. This is referring to the Obstacle Limitation Surfaces (OLS) that protect flight safety from developments that might otherwise present an obstacle and a hazard to flight procedures.

116. Of all OLS, the most onerous are the Take-off Climb Surface (TOCS) and the Approach Surface (APPS) associated with Gatwick’s existing main runway. Both surfaces rise at a gradient of 2%, however, in this case the approach surface to runway 26L is less onerous to development as a result of the inset landing threshold, meaning that the surface starts further to the west and is higher than the TOCS at any given location on the extended runway centreline.

117. The Take-off Climb Surface is associated with departures from runway 08R. This surface starts at the end of the paved runway at the end of the Take-off Distance Available (TODA). Rising at a gradient of 2%, this surface has risen by 8m prior to the first car park, which is located 400m from the end of the paved runway. The second car park starts at a distance of 550m from the runway end and would therefore be limited to an 11m height. The majority of the existing south terminal long-stay car-parks start at a distance of 750 to 800m from the end of the runway and so would be limited to a height of 15 to 16m. By the time the A23 is reached the surface has risen to 25m above the runway threshold level.

118. Car parks are typically design with a 3m floor to floor height to allow sufficient clearance for most conventional vehicles as well as a reasonable allowance for structural depth, lighting and signage.

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			<p>119. Therefore, only the first car park would be limited to a single deck. The second car park could accommodate an additional level of decking. The majority of car parks closer to the A23 could be MSCPs of a minimum of 5 levels and up to a maximum of 7 levels. This is shown in the diagram below.</p>  <p>Figure 4-19. height limitations to car parks due to obstacle limitation surfaces</p> <p>4.11 Commercial Viability of Long-Stay MSCPs</p> <p>120. The Annex states that, “GAL notes that it is not viable for long stay products to be provided through constructing MSCPs, given the added construction costs and lower financial returns from passenger charges for long stay parking.”</p> <p>121. The commercial viability of a MSCP is complex and, to be assessed robustly, would depend on a number of factors. This would include the levels of demand and utilisation, the pricing structure (e.g. rate per bay per day/hour), the cost of development, how the project would be financed and the return on investment required. This cannot be assessed at this time, as it would also depend on the time of development and it is unknown if or when UK government will support a second wide-spaced runway at Gatwick Airport, via a future Airports Commission or otherwise.</p> <p>122. In order to determine the commercial viability of multi-story long-stay parking, GAL would need to consider a combination of pricing levers, design choices, operational efficiency levers, and mode-share levers, etc, many of which factors are within GAL’s control. It should be noted that many airports charge a premium</p>

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			<p>for valet parking, which is an increasing industry trend, and also enables the spatial efficiency gains of block parking.</p> <p>123. Taken at face value, it is likely that the cost of construction of a concrete frame multi-story car park would be greater (per bay) than the cost of an equivalent capacity asphalt surface car park. However, this is just one element of the total costs that should be considered. An important additional consideration is associated with the total area of land take for parking</p> <p>124. Firstly, there is the cost of land purchase at fair market value, which must be considered even in the event that the land is available through Compulsory Purchase Orders, enabled by a Development Consent Order (DCO). This land cost will be multiple times greater for surface car parks than for MSCPs (due to the number of levels), offsetting the increased cost of MSCP construction.</p> <p>125. Secondly there are all of the costs associated with the environmental impact considerations. A greater surface area of hard-standing creates more drainage network infrastructure, and larger balancing ponds, to attenuate the flows to achieve discharge consents. Similarly, recent updates to environmental regulations require biodiversity net gain. For a larger site area, more green space would be replaced by built environment, which would then have to be offset either within the development or off-site for the full development duration at additional cost.</p> <p>126. All cost factors would all need to be considered to determine whether MSCPs cost more to develop than surface parking and, if so, by how much. The GAL representations do not include robust evidence to support this assertion that MSCPs are not commercially viable for long-stay parking.</p> <p>127. Long stay car parking does typically generate a lower rate of revenue (per bay, per hour) than short stay car parking at airports, due to demand and convenience. However, this does not necessarily mean that long stay MSCPs are not commercially viable.</p> <p>128. An important benchmark for comparison is the Heathrow 3rd Runway Development Consent Order. This scheme did not reach a final submission and decision, due to a combination of factors including a judicial review and the impact of the Covid pandemic. However, prior to this, the development masterplan scheme underwent two rounds of public consultation. One particular feature of this scheme was that all long-stay car parking was to be consolidated into two 'Parkways'. One of these was to be located close to M4 Junction 4, while the other was to be located close to M25 Junction 14. Each of these Parkways consisted of multiple MSCPs and were to be connected to the terminal areas by an electric powered transit system.</p> <p>129. Heathrow's decision to adopt the Parkways approach was in part influenced by the need to Compulsory acquire the necessary land for surface car parking, the consideration of the social and environmental impacts of the development on neighbouring communities and cost. In this context of a DCO, it was concluded that</p>

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			<p>land-take associated with extensive surface parking for long-stay was not the right approach for a new runway development. However, this does indicate that MSCPs were considered to be commercially viable for long-stay parking.</p> <p>130. Another relevant example is the Gatwick Airport Planning Application, submitted in 2022, for a proposed MSCP 7 at North Terminal (Planning Application Reference No: CR/2022/0707/CON).</p> <p>131. The delegated report indicates that this 8 story MSCP (ground + 7 levels) with a capacity of 3,200 bays is to be used for pre-booked passengers on a medium stay basis (typically 3 to 8 days).</p> <p>132. Short-stay parking is typically considered to be anything from a 15-minute quick pick-up to an airport visit within a day. Very few passengers are prepared to pay short-stay parking rates for a duration greater than 24 hours unless there is a special offer or their travel choices are not motivated by cost.</p> <p>133. A trip of 3 to 8 days would typically comprise a business trip, a weekend break or a week-long holiday. Before the use of the phrase 'medium stay' this would have traditionally have been considered to be within the time-frame category of 'long-stay'.</p> <p>134. This indicates that MSCPs are commercially viable for long-stay at Gatwick Airport, as many of the 95,750 spaces described in the submission to the Airports Commission in 2014 would be used by passengers travelling within this 3 to 8 day timeframe.</p> <p>135. Appendix A5 of the Updated Scheme Design Submission to the Airports Commission included an important note in Section 3.7 relating to the Eastern area developments as shown in Figure 4-20 below</p>

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			<p>3.7 Eastern area developments</p> <p>The area to the east of the railway has been designated to accommodate a consolidated surface car parking zone which feeds all terminal buildings as well as providing a safeguard for commercial developments should these be required.</p> <table border="1" data-bbox="757 459 1077 592"> <thead> <tr> <th>Car Parking</th> <th>2050</th> </tr> </thead> <tbody> <tr> <td>Short Stay - Number of MSCP</td> <td>9</td> </tr> <tr> <td>Short Stay (spaces)</td> <td>8,500</td> </tr> <tr> <td>Long Stay (spaces)</td> <td>59,750</td> </tr> <tr> <td>Long Stay as Block parking (spaces)</td> <td>23,900</td> </tr> <tr> <td>Staff (spaces)</td> <td>12,100</td> </tr> </tbody> </table> <p>Table 3.7.1 Car Parking Provision for Eastern Zone</p> <p>The area safeguarded for commercial developments, 35Ha, has been calculated on the assumption that some of the businesses impacted by the construction of the second runway, such as those in City Place, Manor Royal and Lowfield Heath, may need to be re-provided. These commercial developments would respond to their own business case which is separate from the second runway's business case. Should these be required there would be a need to deck some of the surface car parking shown in the table above to keep the developments within the extended airport boundary.</p> <p>Figure 4-20. extract from Appendix A5, GAL submission to Airports Commission, 2014</p> <p>136. This clearly states that the safeguarded area could accommodate up to 35 hectares of commercial developments if they need to be re-provided. <i>“Should these be required there would be a need to deck some of the surface car parking, shown in the table above to keep the developments within the extended airport boundary.”</i></p> <p>137. This confirms that 138 hectares of safeguarded land was originally intended to accommodate surface parking (rather than decked car park solutions, as indicated in The Annex).</p> <p>138. This also indicates the GAL accept the principle that car parking intensification to achieve greater parking density was acknowledged to be viable, through decking if necessary, to free up space for other land-uses.</p> <p>139. Lastly, this accepts the principle that commercial developments could be accommodated within this safeguarded land area.</p> <p>4.12 Summary of Safeguarded Land Area</p> <p>140. To summarise the key points made above, the GAL objection to the 2021 Draft Crawley Borough Local Plan is supported by an annex that reviews the safeguarded land required for car parking associated with a wide-spaced southern runway. The basis of this assessment is a number of planning parameters that have</p>	Car Parking	2050	Short Stay - Number of MSCP	9	Short Stay (spaces)	8,500	Long Stay (spaces)	59,750	Long Stay as Block parking (spaces)	23,900	Staff (spaces)	12,100
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			<p>been reviewed and are not found to be supported by robust evidence. This results in an over-estimate of the demand for car parking spaces and safeguarded land area.</p> <p>141. The required number of car parking spaces of 95,750 has been sourced from an appendix to the updated scheme design submission to the Airports Commission. However, this 2014 submission does not take into account the following factors:</p> <p>a. Since 2014, there has been a considerable over-provision of short stay parking on existing airport land near to the North and South Terminals of over 4,400 spaces, which would be increased further by a third terminal associated with the wide spaced runway. As the total quantum of car-parking is constant, this over-provision of short-stay parking would offset the residual requirement for long-stay parking in the safeguarded land.</p> <p>b. The number of car-parking spaces indicated for staff is disproportionate to the increase in traffic and does not reflect the reduced levels of staff parking in recent years. Even allowing for proportionate traffic growth there is an excess allowance for staff parking of over 4,300 spaces.</p> <p>c. The assessment does not take into account the 21,200 spaces that are currently available as 'Off-Airport Approved'. These are acknowledged in the various published masterplans, airport surface access strategies and the DCO application for the emergency runway. There is no indication that these 'Off Airport Approved' car parking providers would cease to provide this service in the event that a southern runway is developed. Therefore these do not need to be re-provided within the Eastern area development.</p> <p>d. The car parking demand does not include the method or basis on which it has been derived and does not transparently account for other factors such as mode-share shift of both passengers and staff.</p> <p>e. Taking only the quantifiable factors into account, there is an over-estimate of the amount of car parking required of 29,900 spaces (over 30%). The realistic requirement for long-stay and staff parking is therefore 65,850 spaces as a basis for the safeguarded land, without re-calculating demand to take mode share shift into account.</p> <p>f. Of these, it is clear from the GAL submission to the Airports Commission that 23,900 of the long-stay parking can be block parking, which has also not been taken into account. Only the residual 42,000 spaces would be conventional parking spaces.</p> <p>This is summarised in the table below:</p>

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			<table border="1"> <thead> <tr> <th>Type of Car Parking</th> <th>Spaces assumed</th> <th>Realistic demand</th> <th>Correction</th> </tr> </thead> <tbody> <tr> <td>Staff parking</td> <td>12,100</td> <td>7,791</td> <td>Reduce staff by 4,309</td> </tr> <tr> <td>Short stay (over-provision)</td> <td>8,500</td> <td>12,900</td> <td>Reduce long stay by 4,400</td> </tr> <tr> <td>Long stay (Off Airport Approved)</td> <td>21,200</td> <td>Excluded from eastern area</td> <td>Reduce by 21,200</td> </tr> <tr> <td>Total spaces in Safeguarded Land</td> <td>95,750</td> <td>65,850</td> <td>Reduce by 29,900</td> </tr> <tr> <td>Block parking / valet</td> <td>0</td> <td>23,900</td> <td>Reduce area due to density</td> </tr> <tr> <td>Conventional spaces in east area</td> <td>95,750</td> <td>42,000</td> <td>Reduced by 29,900 spaces and 23,900 block parking</td> </tr> </tbody> </table> <p>142. The comparison of areas available for parking in the Annex does not take a consistent approach to the with, and without, Gatwick Green scenarios. There is a 13 hectare discrepancy between the size of the Gatwick Green allocation and the areas of safeguarded land that has been considered available for parking. This over-estimates the calculation of parking density required, which should more objectively consider the realistic 44 ha. allocated to Gatwick Green.</p> <p>143. The type of car parking solutions required are based on a typical density of car parking supply. In reviewing the figures used against benchmark of decked and multi-story car-parks at both Gatwick Airport and comparable UK airports it is found the planning parameters used are outside the benchmarked range and are therefore over-estimating the number of MSCP levels required. The following parameters are found to be more realistic:</p> <table border="1"> <thead> <tr> <th>Type of parking</th> <th>Parameter used</th> <th>Benchmarks</th> </tr> </thead> <tbody> <tr> <td>Surface parking</td> <td>20 sqm per space</td> <td>20 sqm per space</td> </tr> <tr> <td>Decked parking</td> <td>31 sqm per space</td> <td>25 sqm per space (depending on number of levels)</td> </tr> <tr> <td>Multi story car parks</td> <td>42 sqm per space</td> <td>35 sqm per space</td> </tr> <tr> <td>Block parking</td> <td>Not used</td> <td>13 sqm per space/</td> </tr> </tbody> </table> <p>144. A mixture of decking and multi-story parking can be accommodated within the aerodrome safeguarding height limitations west of the diverted A23. This area is not limited to a single level of decking only as indicated in the Annex. A single level of decking is a limitation only for the long-stay car-park closest to the end of the runway (adjacent to the railway), increasing linearly up to 7 story MSPCs adjacent to the diverted A23 (the middle of the safeguarded land), if required.</p> <p>145. Multi-story long-stay car parks have been described as not commercially viable, however this assertion is not supported by robust evidence. More detailed analysis would not only consider construction costs, but also</p>	Type of Car Parking	Spaces assumed	Realistic demand	Correction	Staff parking	12,100	7,791	Reduce staff by 4,309	Short stay (over-provision)	8,500	12,900	Reduce long stay by 4,400	Long stay (Off Airport Approved)	21,200	Excluded from eastern area	Reduce by 21,200	Total spaces in Safeguarded Land	95,750	65,850	Reduce by 29,900	Block parking / valet	0	23,900	Reduce area due to density	Conventional spaces in east area	95,750	42,000	Reduced by 29,900 spaces and 23,900 block parking	Type of parking	Parameter used	Benchmarks	Surface parking	20 sqm per space	20 sqm per space	Decked parking	31 sqm per space	25 sqm per space (depending on number of levels)	Multi story car parks	42 sqm per space	35 sqm per space	Block parking	Not used	13 sqm per space/
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			<p>take land purchase and environmental costs into account, both of which will offset the construction savings of surface parking.</p> <p>a. An example from the Heathrow Expansion DCO public consultations demonstrates an example where MSCPs for long-stay parking were determined to be commercially viable, particularly where the alternative of surface parking would have required the compulsory purchase (and social impact) of considerably more land.</p> <p>b. Similarly, Gatwick Airport has submitted a planning application in 2022 for MSCP7 to accommodate pre-booked medium-stay parking for a duration of 3 to 8 days, demonstrating that this is cost viable. A majority of long-stay parking uses including business trips, weekend breaks and week-long holidays that would fall within this duration of stay.</p> <p>146. By combining these various points summarised above, the Annex supporting the GAL representations is seen to be an over-estimate of the safeguarded land area required. It also gives an un-realistic estimate of the density of parking that would be necessary with the allocation of Gatwick Green.</p> <p>147. The following table provides a direct comparison between the GAL representations and the findings of this assessment:</p> <table border="1" data-bbox="719 794 1384 1171"> <thead> <tr> <th data-bbox="719 794 1025 842">Parameter</th> <th data-bbox="1025 794 1182 842">GAL representations (Annex relating to GAT 2)</th> <th data-bbox="1182 794 1384 842">Realistic assessment</th> </tr> </thead> <tbody> <tr> <td data-bbox="719 842 1025 866">Area Available (without Gatwick Green)</td> <td data-bbox="1025 842 1182 866">138 ha</td> <td data-bbox="1182 842 1384 866">138 ha</td> </tr> <tr> <td data-bbox="719 866 1025 890">Area Available (with 44 ha. Gatwick Green)</td> <td data-bbox="1025 866 1182 890">81 ha.</td> <td data-bbox="1182 866 1384 890">94 ha.</td> </tr> <tr> <td data-bbox="719 890 1025 914">Number of spaces required (conventional)</td> <td data-bbox="1025 890 1182 914">95,750</td> <td data-bbox="1182 890 1384 914">42,000</td> </tr> <tr> <td data-bbox="719 914 1025 938">Number of spaces required (block parking)</td> <td data-bbox="1025 914 1182 938">0</td> <td data-bbox="1182 914 1384 938">23,900</td> </tr> <tr> <td data-bbox="719 938 1025 962">Density of spaces required (without Gatwick Green)</td> <td data-bbox="1025 938 1182 962">14.4 sqm per space</td> <td data-bbox="1182 938 1384 962">21 sqm per space</td> </tr> <tr> <td data-bbox="719 962 1025 986">Density of spaces required (with Gatwick Green)</td> <td data-bbox="1025 962 1182 986">8.5 sqm per space</td> <td data-bbox="1182 962 1384 986">14.3 sqm per space</td> </tr> <tr> <td data-bbox="719 986 1025 1034">Type of parking required (without Gatwick Green)</td> <td data-bbox="1025 986 1182 1034">Mixture of surface and decking</td> <td data-bbox="1182 986 1384 1034">Surface parking only (without block parking)</td> </tr> <tr> <td data-bbox="719 1034 1025 1082">Type of parking required (with Gatwick Green)</td> <td data-bbox="1025 1034 1182 1082">MSCPs with at least 3 levels</td> <td data-bbox="1182 1034 1384 1082">Decking or Block parking (or combination of)</td> </tr> <tr> <td data-bbox="719 1082 1025 1129">Height limit to parking structures</td> <td data-bbox="1025 1082 1182 1129">Single deck only</td> <td data-bbox="1182 1082 1384 1129">Varies from single deck up to MSCP with up to 7 levels</td> </tr> <tr> <td data-bbox="719 1129 1025 1171">Cost viability of long stay MSCPs</td> <td data-bbox="1025 1129 1182 1171">Not viable (stated without providing robust evidence)</td> <td data-bbox="1182 1129 1384 1171">Viable cases at Heathrow and Gatwick (also MSCPs are not required).</td> </tr> </tbody> </table> <p>148. Each of these solutions in isolation can be seen to accommodate the parking demand in addition to the Gatwick Green land allocation. A combination of block parking and decking can be seen to very easily surpass the required car parking demand.</p> <p>149. It can clearly be seen that the Gatwick Green land allocation is not prohibitive to safeguarding adequate space for car parking associated with a wide spaced southern runway.</p>	Parameter	GAL representations (Annex relating to GAT 2)	Realistic assessment	Area Available (without Gatwick Green)	138 ha	138 ha	Area Available (with 44 ha. Gatwick Green)	81 ha.	94 ha.	Number of spaces required (conventional)	95,750	42,000	Number of spaces required (block parking)	0	23,900	Density of spaces required (without Gatwick Green)	14.4 sqm per space	21 sqm per space	Density of spaces required (with Gatwick Green)	8.5 sqm per space	14.3 sqm per space	Type of parking required (without Gatwick Green)	Mixture of surface and decking	Surface parking only (without block parking)	Type of parking required (with Gatwick Green)	MSCPs with at least 3 levels	Decking or Block parking (or combination of)	Height limit to parking structures	Single deck only	Varies from single deck up to MSCP with up to 7 levels	Cost viability of long stay MSCPs	Not viable (stated without providing robust evidence)	Viable cases at Heathrow and Gatwick (also MSCPs are not required).
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			<p>4.13 Conclusions – GAT2: Safeguarded Land</p> <p>150. Safeguarded land is required to protect for a future additional wide-spaced runway to the south of the existing airport. It is recognised that this expansion of the airport would require the development of a new terminal building and associated surface access infrastructure.</p> <p>151. The extent of the land required for long-stay car parking associated with a wide-spaced southern runway (including to replace existing car parking facilities displaced by other airport land-uses) has not been demonstrated with robust evidence to satisfy the requirements of the NPPF.</p> <p>152. The 2021 DCO application has demonstrated how additional parking to support growth to 75.6 MPPA with use of the emergency ('Northern') runway can be accommodated within existing airport land. The previously safeguarded land associated with 95 MPPA is not based on current infrastructure or supported by robust evidence to justify the area required.</p> <p>153. This appendix has considered the significant developments in car parking provision since the DfT Aviation White Paper was produced in 2003 and the submissions to the Airports Commission in 2014. This includes considerations associated with sustainable transport policy; trends in mode share shift to public transport and the targets to progress these further to meet the objectives of the Airports Commission; the intensification of car parking land-use that has taken place and is planned under the DCO scoping proposals at Gatwick within existing land, block parking and valet parking products successfully adopted at other UK airports and finally the automated parking products and solutions that are available for use today that would enable further intensification of long-stay parking.</p> <p>154. The GAMP provides no robust evidence to support the extent of land safeguarded for surface car parking: on the contrary, trends in automated and multi-storey parking clearly indicate the ability of GAL to accommodate its parking requirements in a significantly reduced safeguarded area. Furthermore, the Gatwick Green allocation does not block or prevent any critical infrastructure (such as runways, railways, terminals, new or diverted primary access roads) that are fundamentally required to be safeguarded for an additional wide-spaced runway to the south of the existing airport.</p> <p>155. Taking all these factors into account Gatwick Green cannot be considered an incompatible development as it does not hinder sustainable aviation growth at Gatwick Airport. It is therefore fully compatible with any policy requirement to safeguard land for future national requirements. It also cannot be an inappropriate development, given the long-standing requirement for Strategic Employment Locations now addressed by the allocation of Gatwick Green in Strategic Policy EC1.</p>

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			<p>156. As such, the Gatwick Green allocation is entirely consistent with the policy and guidance on safeguarding for transport / aviation infrastructure contained in the NPPF (2019), the APF (2013) and the draft Aviation Strategy (2018).</p> <p>157. The GAMP fails to justify safeguarding of the extent in the current adopted Policy GAT2 (adopted DCBLP, 2015). In the absence of such robust evidence, there is no case to justify the need for the Gatwick Green land for surface car parking as it is not critical to safeguarding airport expansion.</p> <p>5 Conclusions</p> <p>158. A review has been undertaken in relation to the future need for safeguarded land for airport-related car parking; the limitation on land uses and the requirements of the current airport expansion plans under the DCO. These reviews have concluded as follows:</p> <p>a) The Aviation Policy Framework introduced the need for airports, as critical transport infrastructure, to identify future airport expansion needs. It recommends that airports continue to prepare Master Plans as a clear statement of intent so that this can be given due consideration in local planning purposes.</p> <p>b) The National Planning Policy Framework (NPPF) states that there must be 'robust evidence' to identify and protect sites and routes 'critical' to developing transport infrastructure to widen choice and realise opportunities for large scale development.</p> <p>c) An Airport Master Plan should provide the robust evidence to justify the requirements for safeguarded land for infrastructure that is critical to the expansion of the airport.</p> <p>d) The Gatwick Airport Master Plan, published in 2019, indicates an area of safeguarded land for a future additional wide-spaced runway to the south of the existing airport, including an extensive area indicated for surface long-stay car parking between the London-Brighton mainline and the M23. It does not include any analysis or justification for the extent of this land area, instead deferring to preceding Master Plans, that also omit these details.</p> <p>e) In the recent past, two trends have dominated car parking requirements at Gatwick Airport, both of which are intended to be progressed further in current plans and targets. Firstly, there has been a significant improvement in modal shift to public transport principally from private cars to rail. Secondly, that additional car parking required to support growth in air traffic has been accommodated within existing airport owned land though the intensification of parking. GAL intends to continue both these trends to support anticipated growth over the next 15 years.</p> <p>f) There is no robust evidence available to justify the current extent of surface parking, that was initially indicated over 15 years ago. The Airport Masterplan of 2019 - the apparent justification for safeguarding - was not updated to take into account the well-established and continuing trends of a shift to sustainable public transport, parking density, valet parking and more recent innovative automated parking products that are more land-efficient.</p>

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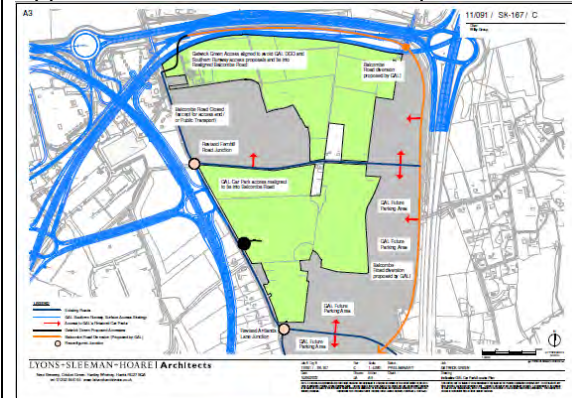
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g) GAL's approach of safeguarding for surface parking in its Master Plan does not represent an efficient use of land given that there are more land-efficient alternatives including valet, block, decked and robotic parking. Whilst the airport is already adopting some of these more efficient parking methods and these are included in the Airport's stated sustainable transport / surface access strategy, there is no reference to these efficiencies in the plan shown for extensive surface parking for the wide-spaced runway. This evidence supports the Council's decision to remove part of this land proposed for safeguarding for extensive surface car parking and instead allocate it for an industrial-led development to meet critical unmet needs is fully justified.

h) The Gatwick Green allocation is also considered to be compatible with the future development of the airport for the following reasons:

- It does not block or prevent any critical infrastructure (such as runways, railways, roads or terminal buildings) that are required to safeguard for an additional wide-spaced runway to the south of the existing airport.
- It does not hinder sustainable aviation growth at Gatwick Airport and is therefore fully compatible with any policy requirement to safeguard land for future national requirements.
- The site can be developed to be fully compliant with the land use requirements for PSZs, as described in the DfT's Circular 'Control of Development in Airport Public Safety Zones', updated in 2020.
- Gatwick Green can be designed to be fully compliant with all other aspects of Aerodrome Safeguarding that need to be considered to protect flight safety from the airport, i.e. in relation to heights of all buildings, bird strike hazard, cranes, lasers, glare and confusing patterns of lights. These will be considered and continue to be addressed as the scheme is developed through its design lifecycle.
- Gatwick Green is compatible with the Airport's short-term expansion plans for the use of the standby runway under GAL's proposed DCO application.

Appendix 5: Indicative Gatwick Airport Limited Car Park Access Plan



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			<p>Appendix 6: Matters for discussion relating to access between Gatwick airport Ltd and the Wilky Group / Gatwick Green Ltd</p> <p>Matters for Discussion Relating to Access Between Gatwick Airport Ltd and The Wilky Group The following summarises those matters associated with the proposed development at Gatwick Green, on which Gatwick Airport, (GAL) and The Wilky Group, have discussed technical feasibility in relation to surface access. It is recognised that this represents discussions on points of technical detail only and this note is therefore a report on their current position. Most of the issues relate to safeguarding for the delivery of the wide-spaced second runway to the south of Gatwick (herein referred to as R2) for which a Masterplan has been published.</p> <p>These discussions have not considered, nor do they relate to the determination of the Gatwick Green allocation for development within the Crawley Local Plan. Instead, the discussions consider some detailed aspects of the Gatwick Green Allocation that would benefit from review in the event that the principle of the allocation was to be taken forward, in order to minimise the incompatibility between any allocation and the R2 Masterplan.</p> <p>Relevant matters The following matters have been discussed between the parties.</p> <ol style="list-style-type: none"> 1. The diversion of Balcombe Road in an East/West alignment across the northern sector of the Gatwick Green site south of the M23 Spur 2. The alignment of the proposed southbound off-slips from the M23 along with the northbound on-slips which have been designed to serve the new R2 terminal. These are shown on the plans received from GAL, to cross the northern sector of the GG site. 3. The proposed access arrangements into GG from the re-aligned A23 road to the west of the GG site, currently shown as a link, off a new roundabout just south of Fernhill Road. 4. The need to ensure access to zones, (retained in the areas surrounding GG) for the provision of airport parking, including where those access routes may impact on the Gatwick Green site. 5. Access to Gatwick rail station via Buckingham Gate, (on Balcombe Road) for buses, pedestrians and cyclists <p>The items for consideration focus on the issues which may be agreed in principle, (largely relating to matters of detail), should the allocation be confirmed as “sound” following the EIP and the Inspectors Report.</p> <p>Progress towards in principle understanding and agreement. Some progress has been made towards identifying the technical principles relating to access to Gatwick Green and the relationship with infrastructure associated with the R2 Masterplan. Whilst no agreement has been reached on any matter at this time, (June 2021), the parties will continue discussions. These will</p>

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			<p>endeavour to support a formal statement of common ground once the representations have been submitted and in the lead up to the Local Plan Examination. This would be without prejudice to GAL's position on the acceptability in principle of the proposed allocation on the Crawley Local Plan of Gatwick Green.</p> <p>Suggested Modifications:</p> <p>4.0 Conclusions</p> <p>4.1 It is concluded that against the tests of soundness at para 35 of the NPPF, Policy GAT2 is sound as it effectively reconciles the immediate need for critical economic development in Crawley Borough and the long term possibility of an additional wide-spaced runway at Gatwick Airport. This is a sound and positive approach to policy, which is justified by the Council's evidence contained in Topic Paper 2 (Gatwick Airport), Topic Paper 5 (Employment Needs and Land Supply) and the SA/SEA, and so is effective and consistent with national planning and aviation policy.</p> <p>4.2 Whilst Policy GAT2 is sound, there is justification for a change to policy that will ensure that the efficient and effective use of land resources is achieved in relation to the provision of future highway connections. This minor change is referred to in this representation at paragraphs 3.1 to 3.9.</p> <p>4.3 It is, therefore, considered that the following amendment should be made to the DCBLP to allow for Gatwick Green's highway infrastructure to be accommodated in the Safeguarded Land between Gatwick Green and the M23 spur road, in a land and resource-efficient manner and in a way that is fully compatible with the future highway infrastructure required to serve the possible additional wide-spaced runway:</p> <p>Policy GAT2 (Safeguarded Land) should include a provision that states that any highway infrastructure associated with the Gatwick Green allocation under Strategic Policy EC4 can be accommodated in the Safeguarded Land between the Site and the M23 spur road, on the proviso that such infrastructure must not prejudice the future provision of motorway slip roads associated with the possible future additional wide-spaced runway.</p> <p>4.4 In relation to the proposed change to the DCBLP above, a revision to Policy GAT2 has been made and is attached at Appendix 7.</p> <p>Appendix 7: Proposed Changes to Policy GAT2</p> <p>Proposed changes to the Draft Crawley Borough Local Plan 2024-2040 (May 2023) Savills on behalf of Gatwick Green Limited</p> <p>Changes to policy / text</p> <p>Proposed changes to the policies and text of the DCBLP are set out below and are indicated by the following means:</p>

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			<p>Additions: underlined Deletions: crossed out</p> <p><u>Policy GAT2: Safeguarding Land</u></p> <p>“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.</p> <p>Small scale development within this area, such as residential extensions, will normally be acceptable. <u>In addition, access/highway infrastructure associated with the Gatwick Green allocation will be acceptable within the Safeguarded Land between the allocation and the M23 spur road, provided it can be designed in a way that is compatible with the expansion of the airport to accommodate highway infrastructure associated with the construction of an additional wide-spaced runway.</u> The airport operator will be consulted on all planning applications within the safeguarded area.</p> <p>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.”</p> <p>Reasoned Justification</p> <p>....</p> <p>“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 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. <u>Access to the Strategic Employment Location from Balcombe Road and a road to serve the Gatwick Green allocation can be accommodated in the Safeguarded Land between the allocation and the M23 spur road, in a manner that is compatible with the future provision of highway infrastructure associated with an additional wide-spaced runway: Policy GAT2 provides for this arrangement.</u>”</p>

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REP/056 (2023)	Gatwick Airport Limited	GAT2	<p>GAT2: Safeguarded Land</p> <p>10. In 2021, we previously supported the introduction of the new Policy GAT2. We maintain our support in principle for the policy.</p> <p>11. We nevertheless believe that the phrase ‘small scale’ requires definition as well as clarification as to whether it is intended to refer to both residential and other forms of development. This is of particular consequence due to the cross-referencing of Policy EC2 in respect of Lowfield Heath.</p> <p>12. We consider that the previous wording of the policy advising what types of development were likely to be permitted in the safeguarded land was helpful and should be retained in the policy wording. The previous wording that stated “minor development within this area, such as changes of use and small-scale buildings works, such as residential extensions, will normally be acceptable” made clear what was meant by minor development and gave the decision maker and statutory consultees a clear steer on the intention of the policy. The proposed policy wording has been watered down to such an extent that it could give rise to a wide range of interpretations that we consider could lead to the approval of prejudicial development in the safeguarded land that conflicts with the intended purpose of retaining the land in the first place.</p> <p>13. We also confirm that we do not object to the approval of temporary uses which do not prejudice the future delivery of a second runway which could be achieved through the reinsertion of the existing policy wording “Where appropriate, planning permission may be granted on a temporary basis” at the end of the draft policy</p> <p>14. We previously objected to the loss of safeguarded land at Gatwick Airport through the new allocation of 47 hectares of land to the east of Gatwick Airport as a strategic employment site (see Draft Policies EC1 and EC4). We continue to vigorously object to this allocation (refer to further comments in respect of Policies EC1(v) and EC4 below).</p> <p>15. We also objected to the potential loss of safeguarded land at Gatwick Airport in respect of the provision of the Crawley Western Relief Road. We continue to object to this policy (refer to comments in respect of Policy ST4 below).</p> <p>Suggested Modifications:</p>
REP/068 (2023)	Sussex Wildlife Trust	GAT2	<p>SWT highlights that there has been uncertainty from the LPA about this policy throughout the consultation process, but that it has now been incorporated into the submission version of the plan.</p> <p>SWT does not support the expansion of the airport and we do not feel this policy is consistent with sections 170 and 174 of the NPPF. The potential impacts on the land, and in particular those areas of high biodiversity value, must be made clear. We highlighted that CBC have not currently made it clear what the safeguarded land would be considered potentially suitable for if the safeguarding was removed.</p>

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			<p>We support the position of the Woodland Trust that;</p> <p>The policy should ensure that no areas of ancient woodland or veteran trees are included in this land safeguarded for future airport development.</p> <p>We are concerned that the proposed area includes the following ancient semi-natural woodlands (ASNW):</p> <ul style="list-style-type: none"> •Allen’s Wood ASNW (Grid reference: TQ3003540208) •Huntsgreen Wood ASNW (Grid reference: TQ2828540024) •Horleyland Wood ASNW (Grid reference: TQ2898240539) •Rowley Wood ASNW (Grid reference: TQ2791939226) •Unnamed ASNW at TQ2955640750 <p>In addition, we are concerned about the proximity of the site to</p> <ul style="list-style-type: none"> •Black Corner Wood ASNW (Grid reference: TQ2996939934) <p>We consider that this policy is not legally compliant or sound unless these areas of ancient woodland are excluded from any future development sites, with an appropriate buffer specified.</p> <p>Suggested Modifications:</p>
REP/087 (2023)	Woodland Trust	GAT2	<p>Policy GAT2: Safeguarded Land</p> <p>The policy should ensure that no areas of ancient woodland or veteran trees are included in this land safeguarded for future airport development.</p> <p>We are concerned that the proposed area includes the following ancient semi-natural woodlands (ANSW):</p> <ul style="list-style-type: none"> • Allen’s Wood ASNW (Grid reference: TQ3003540208) • Huntsgreen Wood ASNW (Grid reference: TQ2828540024) • Horleyland Wood ASNW (Grid reference: TQ2898240539) • Rowley Wood ASNW (Grid reference: TQ2791939226) • Unnamed ASNW at TQ2955640750 <p>In addition, we are concerned about the proximity of the site to</p> <ul style="list-style-type: none"> • Black Corner Wood ASNW (Grid reference: TQ2996939934). <p>We consider that this policy is not legally compliant or sound unless these areas of ancient woodland are excluded from any future development sites, with an appropriate buffer specified.</p> <p>Suggested Modifications:</p> <p>We consider that this policy is not legally compliant or sound unless these areas of ancient woodland are excluded from any future development sites, with an appropriate buffer specified.</p>

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REP/127 (2023)	Arora Management Services	Local Plan Map (Gatwick Airport Safeguarding Zone) /GAT2	<p>Thank you for notifying us of the amended Regulation 19 Consultation of Crawley's draft Local Plan. We provided detailed comments on the last round of consultation (dated 29-06-21) and we confirm that our comments on the previous version of the draft Local Plan should still stand.</p> <p>We would like to additionally highlight, however, that the proposed removal of Schlumberger House (Use Class E) from the Airport Boundary means that the Arora Group are more likely to explore alternative uses for this site, and it would be possible to secure residential uses on the site using the Prior Approval (Class MA) route, subject to satisfying Transport, Noise, Contamination (etc...) considerations. The Arora Group currently have no intention of introducing residential uses onto this site and would rather pursue airport-associated uses, which would be consistent with the current designation, however if the site is removed from the airport boundary and added to the safeguarding zone, we would need to consider alternative uses for this site which are not linked to the airport, which could include the introduction of C3 uses.</p> <p>As a final point, and expanding on the concerns over safeguarding set out in the previous June 2021 response and the uncertainty surrounding the delivery of a main second runway (ignoring the proposals to allow use of the northern runway for some departing planes), we suggested a modification to Policy GAT2 (Safeguarded Land). Having considered this further, we suggest that Policy GAT2 be amended to allow temporary or meanwhile uses of safeguarded land, provided these meanwhile uses are consistent with surrounding land uses/planning designations, as relevant, on the basis that this would still allow local business to make efficient use of their land, expand and grow (in accordance with the NPPF) whilst satisfying the government's safeguarding requirements in respect of the draft national Aviation Strategy, Aviation 2050 (December 2018). On this basis, we suggest the following modification to Policy GAT2:</p> <p>Small scale development within this area such as residential extensions, the redevelopment of existing employment / commercial sites, or temporary uses consistent with other local plan policies, will normally be acceptable. The airport operator will be consulted on all planning applications within the safeguarded area.</p> <p>Policies do not appear to have been fully justified and are detrimental to existing landowners' commercial interests.</p> <p>Suggested Modifications:</p>
REP/144	BYM Capital	GAT2	<p>Draft Policy GAT2: Safeguarded Land</p> <p>We object to this policy on the basis it is not justified and not consistent with national policy. The draft local plan policy map identifies land that should be "<i>safeguarded from development which would be incompatible with the expansion of the airport to accommodate the construction of an additional wide spaced runway (if required by national policy)</i>", restricting it to small scale development only. For the reasons set out below, we request that policy GAT2 is deleted in its entirety.</p>

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			<p>The <i>Airports National Policy Statement: new runway capacity and infrastructure at airports in the South of England (June 2018)</i> confirmed that the Government is in agreement with the Airport Commission's work that the preferred scheme is Heathrow's Northwest Runway (announced in October 2016), not an additional runway at Gatwick. On that basis, there is no national support for an additional runway at Gatwick – this has been the position for some time with no evidence to suggest that position will change during the plan period.</p> <p>Gatwick's own Masterplan (2019) confirms that Gatwick are “<i>not actively pursuing plans for an additional runway to the south</i>”. This position was reinforced by the CBC Regulation 18 local plan which proposed deletion of Policy GAT2 (safeguarding) due to lack of evidence for the need.</p> <p>The latest relevant national strategic framework 'Flightpath to the Future' (2022, DfT), does not refer to any additional runway safeguarding needs at Gatwick.</p> <p>It is clear that for the CBC local plan to be considered sound, it needs to be consistent with national government policy, and it needs to be justified via an appropriate strategy taking into account relevant evidence. The continued safeguarding of land to the south of Gatwick Airport is not consistent with national policy and is not justified.</p> <p>Furthermore, the NPPF states that plans should positively seek opportunities to meet the development needs of their area (paragraph 11a). Local Plans should “<i>provide a clear strategy for bringing sufficient land forward... to address objectively assessed needs over the plan period</i>” (paragraph 23).</p> <p>The draft Local Plan confirms that there is a shortfall of 13.73ha of new industrial land over the plan period. Whilst the draft local plan notes that the Gatwick Green site can meet this outstanding requirement, any development on site is likely to be delivered over a long period of time and delivered in a phased manner. The Borough's “key mixed business location” is located to the south of Gatwick at Manor Royal. The proposed runway safeguarding policy restricts the future sustainable extension of Manor Royal. By restricting development within safeguarded land, the local plan is not actively seeking to meet the Borough's objectively assessed employment needs.</p> <p>Suggested Modifications: For the plan to be positively prepared and to meet the minimum objectively assessed needs, the safeguarding policy should be deleted.</p> <p>For the reasons set out above, draft Policy GAT2 should be deleted in its entirety.</p>
REP/149	Turley on behalf of Panattoni UK	GAT2	<p>Panattoni have an active interest at land to the north of Fleming Way, Crawley, which sits within the Manor Royal Business District on the northern edge of Crawley, West Sussex. Panattoni submitted a planning application in March 2022 (Planning Reference: CR/2022/0187/FUL) for the: “<i>DEMOLITION OF EXISTING BUILDINGS TO PROVIDE TWO COMMERCIAL BUILDINGS (UNITS A AND B) FOR STORAGE AND DISTRIBUTION (B8) USE WITH ANCILLARY OFFICES, WITH ASSOCIATED</i>”</p>

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			<p><i>ENABLING WORKS, ACCESS (INCLUDING NEW ACCESS FOR UNIT A OFF HYDEHURST DRIVE), PARKING AND LANDSCAPING”</i></p> <p>The local planning authority, Crawley Borough Council, resolved to grant planning permission on 6th February 2023, with the Section 106 to be signed and executed shortly.</p> <p>The main purposes of this representation is to object to the principle and extent of the proposed Gatwick Airport Safeguarded Land area, proposed under draft Policy GAT 2 of the emerging Local Plan.</p> <p>The Gatwick Airport Safeguarded Land boundary as set out on the draft Proposals Map 2023 has been expanded further to the south and is proposed to cover a much larger area, than its position on the adopted Proposals Map 2015.</p> <p>The Safeguarded land boundary within the latest draft Proposals Map now includes part of our clients land at Fleming Way, Crawley, as demonstrated below in purple shading:</p> <p>Our clients raise fundamental concerns as to the soundness of this approach for the reasons set out below.</p> <p>The Need for Safeguarding</p> <p>Our clients site is situated within the Manor Royal Main Employment Area as defined by the adopted and emerging Local Plan economic policies EC1, EC2 and EC3. This is as shown on the adopted and emerging proposals map.</p> <p>Policy EC3 places a clear focus on the delivery of business uses in Manor Royal, seeking to protect and reinforce its core business function by promoting development within the B use classes, and encouraging the reuse and intensification of land or buildings within the main employment area.</p> <p>As set out within the draft Local Plan under proposed Policy EC3, <i>“Manor Royal is the principal business location for Crawley, and is instrumental to the economic success of the Gatwick Diamond. Its core business function is a key strength that should be retained and enhanced.”</i></p> <p>It is therefore entirely inconsistent for the Council to identify any land with Manor Royal for future airport safeguarding and undermine the role that Manor Royal plays within the Borough. The inclusion of land within Manor Royal for safeguarding purposes is completely contradictory to the approach of Policy EC3. Rather than support Manor Royal’s enhancement, safeguarding additional land would degrade its role and perpetuate employment land issues within the Borough.</p> <p>We would also note that Plan 20 (Airport Layout) (Additional Runway) in the GAL Masterplan 2019, an extract of which is provided below, indicates that the safeguarded land which falls within our clients site appears to simply facilitate a road.</p>

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			<p>It is considered that this could be easily accommodated, re-directed, to avoid the small proportion of our client site should the additional runway be brought forward ensuring the proposals do not place additional cost on the operation of an additional runway</p> <p>Notwithstanding our comments below on the principles of safeguarding land in its entirety, the safeguarding area should at the very least sit outside of the Manor Royal Employment Area as defined by the Local Plan. This would ensure consistency between policies within the adopted Local Plan and ensure that Manor Royal can retain its function as the principal business location within Crawley.</p> <p>However, the decision to retain safeguarded land for the future expansion of Gatwick Airport, is even more incongruous when one considers the national policy position for additional runway capacity set out within the Airports National Policy Statement (“ANPS”).</p> <p>Following the Supreme Court’s decision of 16th December 2020 in R (on the application of Friends of the Earth Ltd and others) v Heathrow Airport [2020] UKSC 52 (the Supreme Court Case) it is confirmed that additional runway capacity in the South East is to be met by the Heathrow Northwest Runway.</p> <p>There is no evidence of the need for further runway capacity in the South East (indeed, the Government and the Courts have expressly stated that a runway at Gatwick Airport is not a solution to meeting such capacity as it does not meet the objectives of Airport expansion in the South East) and Gatwick Airport have confirmed that they are no longer pursuing an additional wide-spaced runway (the purpose behind the previous safeguarding) in their 2019 Masterplan and within the EIA Scoping Report (September 2019) for the Development Consent Order (“DCO”) application to make best use of the existing runways.</p> <p>There is no evidence, let alone robust evidence, for retaining the safeguarding as required by the National Planning Policy Framework. The Draft Local Plan, as proposed, is therefore unsound and does not meet the tests of soundness as set out by the National Planning Policy Framework.</p> <p>In this regard we would also bring attention to paragraph 5.4.1 of the GAL Masterplan 2019 which states: <i>“Gatwick is no longer actively pursuing plans for an additional runway, but there nevertheless remains the possibility of building and operating one in the future.”</i></p> <p>The matter of identifying safeguarded land for airport capacity within the Local Plan is a matter of planning judgement and one for the local planning authority to make.</p> <p>It is plain that the Council have had significant reservations about the likelihood of Gatwick Airport Expansion coming to fruition and during previous consultations of the emerging Local Plan removed the need for safeguarding. This position was supported by a number of key employers and occupiers within the Borough.</p>

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			<p>To emphasis the point the Council have excluded a significant chunk of the safeguarded land identified within 2019 Gatwick Airport Masterplan for the delivery of Gatwick Green, a 47ha parcel of land to the east of Gatwick Airport. This was facilitated as the Council cannot meet their employment requirements without doing so.</p> <p>It light of this employment requirement the Council should not look to dilute and sterilise land within identified employment areas based on a hypothetical scenario of the expansion of Gatwick Airport to the south. It has plainly been rejected at a national level in favour of the expansion of Heathrow Airport, coupled with Gatwick airport themselves acknowledgement that they are no longer pursuing the expansion proposals in both the 2019 Masterplan and the DCO application and are rather seeking to make best use of existing runways.</p> <p>The Council and/ or the Inspector should exercise there planning judgement and note that based on the facts before them that there is insufficient evidence to warrant the safeguarding and consequential sterilisation of land within this plan period.</p> <p>Summary</p> <p>In summary, the airport have openly admitted through their own 2019 Masterplan document and DCO application that they are not pursuing the provision of an additional runway and at a national policy level it has been concluded that that additional runway capacity in the South East is to be met by the Heathrow Northwest Runway. This has also been endorsed / accepted through the Supreme Court. The safeguarding of land is now redundant.</p> <p>Suggested Modifications:</p> <ul style="list-style-type: none"> - The removal of Policy GAT 2 from the emerging Local Plan on the basis that there is insufficient evidence to warrant its inclusion; or - Should the Council / Inspector deem that the safeguarding land needs to remain in some guise, to not needlessly sterilise identified employment land and perpetuate employment issues within the Borough and exclude our clients land from the proposed safeguarding.
REP/154	DWDLIP on behalf of AITUP	GAT2	<p>Safeguarding</p> <p>AIPUT is supportive of the definition of 'small scale development' in paragraph 10.19 in relation to Policy GAT2 which would allow for the updating or refurbishing of buildings. This is because there is a reasonable need to invest in enhancements or redevelopment of individual existing buildings when they come to the end of their functional and/or economic life to provide new facilities that modern incoming occupiers require.</p> <p>However AIPUT has a background concern with the continued restriction that safeguarding places on the ability to invest in and redevelop existing properties and 'brownfield' land within the safeguarded zone. Topic Paper 1 (Unmet Needs and Duty to Cooperate) identifies that the adopted local plan acknowledges the restrictions on land for further development as a result of airport safeguarding.</p>

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			<p>With respect to the Northern Runway proposals, in the case that a development consent order is granted, there is likely a need for expansion of safeguarded area and further safeguarded land as late as 2038, which would be over two decades of restrictive safeguarding on near airport land. Yet due to unclear wording in paragraph 10.19, the allowance for updating, refurbishment, or replacement with a modern building of comparable scale, appears limited. This would pose a significant risk for property and land within safeguarded areas to become blighted and at the least simply fail to provide the level of quality and functionality needed for the safe and efficient operation of the expanded airport. This also is not appropriate in the context of Net Zero 2050 legislation and the aims of Policy SDC1 which seeks improved energy/resource usage and reduced carbon intensity of the borough's building stock.</p> <p>Topic Paper 5 (Employment Needs and Land Supply) acknowledges the role of airport safeguarding as a land supply constraint and therefore rejects the use of Gatwick Green land as airport parking as outlined in the GAL Masterplan. However, AIPUT notes that the expansion of the safeguarding area into the northern area of Manor Royal, Land at Fernlands and outlined in the GAL masterplan has been reflected in the draft submission Local Plan. AIPUT recognises that extensions to Manor Royal will continue to be significantly restricted by safeguarded land.</p> <p>Suggested Modifications: We therefore request the following additional wording in paragraph 10.19 (in underline) for reasons of clarity and soundness: <i>For the purpose of policy interpretation small-scale development includes development such as residential extensions, updating, or refurbishment or replacement at similar scale of buildings <u>where compatible with Policy SDC1, some changes of use, or other minor development. Incompatible development within safeguarded land is regarded as development which would add <u>built or environmental</u> constraints or <u>significantly 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.</u></u></i></p>
REP/011 (2023)	National Highways	GAT3	<p>NH are concerned about the provision of additional or replacement airport-related parking. The provision of additional car parking will give rise to additional vehicle trips which, due to the close proximity and the nature of the airport development, could result in a significant increase in the number of vehicle trips on the SRN. This may impact on the safety, reliability and operational efficiency of the SRN. Development proposals outside of Gatwick Airport boundary for additional car parking should be accompanied by a detailed Transport Assessment setting out the impact on the M23 junctions 10, 10a and 11 and what mitigation is proposed.</p> <p>The passenger mode share targets set out in Policy GAT3 do not align with the latest passenger mode share targets in the Gatwick Airport Transport Assessment. The Policy should be updated to reflect these.</p> <p>Suggested Modifications:</p>

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REP/033 (2023)	Horsham District Council	GAT3	Policy GAT3: Gatwick Airport Related Parking We support this policy, which seeks to limit new or replacement airport parking to within the airport boundary. This is consistent with the approach taken jointly thus far by Horsham District and Crawley Borough Councils.
			Suggested Modifications:
REP/044 (2023)	HX Properties Ltd. (Agent: Tim North Associates)	GAT3	<p>Dear Sirs</p> <p>Crawley Borough Local Plan 2024 – 2040: Submission Consultation Draft May 2023</p> <p>My clients, HX Properties Ltd, object to Policy GAT3 of the Crawley Borough Local Plan 2024-2040 Submission Consultation Draft (hereinafter referred to as the CBLP 2024-2040) including paragraphs 10.24 to 10.27 inclusive, which provide the reasoned justification to the same policy. It is considered that both the policy and its supporting text are unsound. These representations should be taken as superseding those submitted to your Council under the Regulation 19 Consultation on the 27th February 2020.</p> <p>Policy GAT3 is concerned with “<i>Gatwick Airport Related Car Parking</i>” effectively reintroducing Policy GAT3 from the statutorily adopted Crawley Borough Local Plan 2015-2030, but clarifying the interpretation afforded to the same policy where previously it was unclear. Both limbs i) and limb ii) are required to be met before additional or replacement airport-related parking can be permitted on-airport. Limb ii) of Policy GAT3 in the CBLP 2024-2040 has become less onerous as there is no mention of the fact that any proposal “<i>must</i>” be justified by demonstrable need before being acceptable on-airport.</p> <p>The reasoned justification behind Policy GAT3 is based on a false premise and is fundamentally flawed, in that it takes no account of, and is inconsistent with, the provisions of Schedule 2 Part 8 Class F of the Town & Country Planning (General Permitted Development) (England) Order 2015 (As Amended). The Airport Owner on “<i>Operational Land</i>”¹ can construct surface car parking or build multi-storey car parks in accordance with the permitted development rights, for which no express planning permission is required, and without having to justify “<i>...a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport</i>”.</p> <p>This can only mean that Policy GAT3 set out in the CBLP 2024-2040 is unnecessary and serves no valid purpose, completely nullifying the reasoned justification set out in paragraph 10.24 to 10.27 inclusive.</p> <p>This position appears to be accepted by Gatwick Airport Ltd (hereinafter referred to as GAL) as evident from the comment set out in their statement accompanying the planning consultation submitted to Crawley Borough Council relating to a Proposed Multi-Storey Car Park 7 (MSCP7), the subject of Application No. CR/2019/0878/CON, reveals: “<i>... development plan policies have no weight for permitted development.</i>”</p> <p>In the opinion of HX Properties Ltd, if Policy GAT3 is to be retained in the CBLP 2024-2040, then consideration should be given to removing permitted development rights where it relates to car parking</p>

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			<p>provision on “Operational Land” within London Gatwick Airport through an Article 4 Direction. The Article 4 process will then provide the appropriate reasoned justification and purpose behind the same policy, allowing decisions to be more transparent, with Gatwick Airport Limited (hereinafter referred to as GAL) having to justify a demonstrable need in respect of any application involving on-airport car parking, ensuring compliance with Policy GAT3.</p> <p>It is a well-known fact that Crawley Borough Council rely on GAL in providing evidence on the central issue of “demonstrable need” to support its case in refusing proposals for long term off-airport car parking in its administrative area. The involvement of GAL means that, by association, the same company occupies a key position in the decision-making process, particularly in cases where an applicant proceeds to appeal against the Local Planning Authority’s refusal, or non-determination of a long term off-airport car parking proposal.</p> <p>GAL as a private company, has a dominant position in surface access facilities provided at London Gatwick Airport, being present in the upstream market (i.e. facilities at an airport, such as bus stations or car parks), as well as the downstream market (i.e. allowing providers to access the facilities at an airport), where they relate to levels of surface access provision. To this end, GAL is an important beneficiary of the same policy, meaning that fundamental issues governing customer choice in terms of airport related car parking are removed from the planning process. This is in spite of the fact that lawful long term off-airport car parking proposals have an important role to play in airport related car parking supply, to the extent that without their involvement, GAL would face serious difficulties in accommodating all airport related passenger car parking needs on-airport.</p> <p>These are important material considerations not only from a town planning perspective but also seen in terms of competition law. Furthermore, factors surrounding airport related passenger car parking influence decisions taken by GAL through its Capital Investment Programmes concerning future levels of on-airport car parking expenditure.</p> <p>My clients consider a methodology should be agreed in which to assess long term demand and supply issues relating to both on and off airport-related car parking provision. This process would involve your Authority, GAL and representatives of those involved in lawful long term off-airport car parking facilities. This will enable broad agreement to be obtained on source material relating to the various CAA metrics concerned with private vehicle car mode share. Following discussions between the various parties, if it is found that GAL’s own in-house data known as the “retail profiler” is more reliable than the surveys produced by CAA, final agreement can then be reached on an important data source considered fundamental to the issue of future long term on and off airport related car parking.</p> <p>This will reduce issues of dispute, or at least highlight those specific areas where agreement cannot be reached surrounding existing and future demand for and supply of airport related car parking, including the concept that the same two factors are “in balance”. To this end, through collaboration, a sound base for</p>

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			<p>deciding applications will be provided, not dissimilar to the way in which the NPPF requests Local Planning Authorities to use the standard methodology in order to establish a minimum local housing needs figure (LHN) in their administrative areas.</p> <p>With these considerations in mind, reference should be made to the latest version of the Airport Surface Access Strategy 2022-2030 (hereinafter referred to ASAS 2022-2030) published in October 2022, in which it is said:-</p> <p><i>“One of the most important aspects of our surface access approach is to work together with a wide range of stakeholders and business partners. Only by doing this we can achieve a co-ordinated approach to meeting shared objectives.”</i> (my emphasis)</p> <p>This important quote falls under the title The Gatwick Area Transport Forum set up in 1998, consisting of GAL, local authorities, transport providers and agencies, business representatives, airlines and other interested parties. The ASAS 2022-2030 confirms that membership of the Gatwick Transport Forum Steering Group has fluctuated over the past two decades, before going on to state:-</p> <p><i>“We consider now would be a good time to undertake a refresh of the Terms of Reference and the membership of the Steering Group who will consult with the existing group members, airport representatives and other stakeholders to ratify any changes in the next few months.”</i></p> <p>Unfortunately, Holiday Extras Ltd/Airparks, and to their knowledge, all other long term off-airport car parking providers, have at no time been invited to attend the Gatwick Transport Forum Steering Group, which in the light of the need for a <i>“co-ordinated approach”</i> is difficult to understand. It becomes even more surprising when assessing other projects, initiatives and achievements made against the Target and Action plan set out in the previous ASAS covering the period 2018-2022. Under the title <i>“Car Parking Strategy”</i> Action 13 it is said:-</p> <p><i>“Convene a regular stakeholder working group relating to Local Community Access and off-airport parking to deliver specific actions and outcomes through partnership.”</i></p> <p>In answer to the question - what did we achieve? the following response is provided: <i>“One of the achievements is the need to reinvigorate post pandemic typical topics/issues, including facilities for Uber/taxi providers and managing parking in residential streets close to the airport.”</i> These issues are equally relevant to lawful long term off-airport car parking providers, if only for sustainability reasons along with matters relating to general amenity.</p> <p>The contents of supporting paragraph 10.24 to Policy GAT3 refers to the May 2022 Section 106 Planning Obligation entered into between Crawley Borough Council, West Sussex CC and GAL, in which an obligation concerning a target of 48% of passengers travelling to the airport by public transport is referred to.</p>

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			<p>Regrettably, Obligation 5.6.1 has been misquoted. Clause 5.6.1 taken from the Section 106 Planning Obligation executed on 24th</p> <p>May 2022 is reproduced below, from which it can be seen that the target of 48% of passengers travelling to the airport by public transport involves an assessment of combined on- and off-airport supply, and not simply on-airport public car parking spaces.</p> <p><i>“5.6.1 Provide sufficient but no more on-Airport public car parking spaces than necessary to achieve a combined on and off airport supply that is proportionate to 48% of non-transfer passengers choosing to use public transport for their journeys to and from the airport by end of 2024.”</i></p> <p>This clause contained in an up-to-date Section 106 Planning Obligation clearly points to the need for a joint approach with long term off-airport car parking providers. The error in the wording of Clause 5.6.1 also manifests itself in paragraph 3.7.3 of Topic Paper 2: Gatwick Airport dated May 2023, highlighting the approach taken by the Local Planning Authority when considering the contribution made by lawful long term off-airport car parking uses.</p> <p>The ASAS 2022-2030 goes further than the recently executed Section 106 Planning Obligation, in that Target 1 seeks to achieve 52% of passenger journeys to the airport by public transport by 2030 under the scrutiny of the Transport Forum Steering Group, as part of meeting a target of 60% by sustainable modes and ultra-low or zero emission vehicles.</p> <p>It is argued that neither the 48% figure set out in the May 2022 Section 106 Planning Obligation nor the 52% figure in the latest version of the ASAS is considered to be a challenging target, given that in the fourth quarter of 2017 (October to December), CAA’s O & D reveals that a public transport modal share figure of 48.3% was achieved.</p> <p>Equally relevant is the fact that no evidence has been produced to demonstrate that any long term off-airport car parking uses has prevented the modal share in favour of public transport from being reached, whether in an ASAS or a Section 106 Planning Obligation. On the contrary, the target figure of 52% is, in all probability likely to be met, when it is realised that visitors to the UK are always more likely to use public transport than those living and working in the UK.</p> <p>As with all matters concerning airport access, the Airport Operator is reliant on stakeholders who pursue different priorities from those of the airport company. In the case of rail companies, there are capacity issues around East Croydon, which have an impact on the extent to which additional rail services can be accommodated on the network particularly in journeys made to principal London Stations and beyond to Bedford. Improvements to the strategic road network, especially the M23 Motorway can result in unintended consequences in terms of attracting less sustainable modes of access to the airport, i.e. kiss-and-fly.</p>

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			<p>GAL has a vested interest in ensuring that new long term off airport car parking sites do not materialise, especially as car parking represents an important revenue stream for the Airport Operator. This becomes evident from the latest financial statement for the year ending 31st December 2022 prepared on behalf of the group of companies that owns London Gatwick Airport. The financial statement shows an increase in car parking revenue of £14.5m compared with the Pre-Covid 19 year of 2019, being the only category to show a rise in revenue of all the remaining principal components contributing to total revenue, save for what is termed “<i>other income</i>”. In contrast, airport and other traffic charges; retail revenue; property income; operational facilities and utilities income, all reveal declining revenues. The increase in car parking revenue of £14.5m is equivalent to 13.1% of total revenue received by the airport in 2022, largely due to the introduction of forecourt charges paid for by passengers, along with long term off-airport car parking operators.</p> <p>The contents of supporting paragraph 10.25 indicate that there are a significant number of car parking spaces provided on airport locations within the airport boundary. At the time of writing these representations GAL is yet to submit its DCO application to the Secretary of State concerning the use of the existing Northern Runway, currently restricted to a stand-by for emergency purposes only, into routine operation alongside the main runway. An expected increase in passengers amounting to approximately 75.6m passengers in 2038 and around 80.2m passengers in 2047 is envisaged. HX Properties Ltd support this proposal, although they have reservations on the levels of future on-airport car parking to meet this level of increased passenger throughput.</p> <p>In advance of studying the documents forming part of the DCO application, reliance can only be placed on the consultation document Summer 2022 entitled “<i>Our Northern Runway: Making Best Use of Gatwick</i>”. An examination of “<i>Our Northern Runway: Making Best Use of Gatwick</i>” reveals that in terms of the future baseline scenario, an additional 6,034 spaces would be created. This figure takes into account those spaces lost from Staff Car Park M at the same time showing the net increase in new spaces provided by the Hilton Multi-Storey Car Park, as set out in Application No. GR/2020/0575/NCC.</p> <p>In the case of the Northern Runway project scenario, GAL reveal that 7,780 passenger and staff car parking spaces will be permanently lost to other developments, although this figure is an considered to be an underestimate, as not all staff car parks which will be lost are included, whilst in the case of passenger valet parking at Car Park MA-01, there is no reference to a consultation application having been lodged with Crawley Borough Council.</p> <p>An assessment carried out on behalf of HX Properties Ltd reveals that the number of permanently lost spaces on airport is far greater between 11,070 and 14,070. The proposed additional car parking spaces relied upon by GAL as part of the northern Runway project does not meet the higher of the two figures of permanently lost</p>

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			<p>spaces shown by HX Properties Ltd, and is just over 1,000 spaces more than the lower figure of permanently lost spaces assessed by my client.</p> <p>The purpose of highlighting these figures at this stage is that in advance of the submission of the DCO application, there is no evidence to justify the proposition that the Northern Runway project will provide sufficient on-airport passenger car parking spaces to cater for the anticipated increase in passenger throughput. My clients reserve the right to amend their position following the submission by GAL of their DCO application. GAL's DCO application is anticipated to be submitted to the Secretary of State in the second quarter of 2023, which it is understood is imminent.</p> <p>To the extent that long term off-airport car parking provides an important contribution to airport related car parking, means that it has a role to play in the supply of the same product, meeting a quantitative as well as a qualitative need; despite the fact that there has been a consistent and marked reduction in the supply of long term off-airport car parking provision since the Gatwick Airport Interim Master Plan was published in 2006. The figure set out in the Gatwick Airport Masterplan 2018 of 21,196 authorised long term off-airport car parking spaces is strongly disputed.</p> <p>This aside, a number of long term off airport car parks have been found to occupy "<i>sustainable locations</i>" whilst at the same time offering "<i>customer choice</i>" 2. This becomes evident from various Inspectors' appeal decisions including those in your Council's administrative area, further supported by the contents of Case Officers' reports granting planning permission for the same use outside the Operational Area of London Gatwick Airport.</p> <p>Since the Crawley Borough Local Plan 2015-2030 became a statutorily adopted document, the Government has published a number of documents, the most recent of which place increasing important emphasis on issues such as cleaner engine technology, electrification of cars and decarbonisation of rail electricity, as a means of reducing surface transport carbon emissions, in terms of future surface access journeys to the airport.</p> <p>In April 2018 the government published a document entitled "<i>Beyond the Horizon: The Future of UK Aviation – Next Steps Towards an Aviation Strategy</i>" which took into account responses obtained from the Call for Evidence, as part of an early stage in formulating an updated aviation strategy. It placed at the forefront of the aviation strategy the requirement to encourage aviation which it stated "<i>helps to ensure that customers get the best deals and a quality of service</i>", with the government committing itself to continue "<i>to work with industry to make sure that the right level of competition exists to bring benefits to passengers.</i>"</p> <p>The Aviation Strategy included six core objectives: paragraphs 6.42 and 6.43 being of relevance when examining surface access considerations:-</p>

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			<p><i>“6.42 As airports grow, surface access options need to be developed in tandem to cater for increased passenger numbers travelling to and from the airport. As highlighted in a number of call for evidence responses, this coordination of public and private investment is difficult and at time can seem uncoordinated. This challenge can often be compounded by the private ownership structure of UK airports, which can potentially make providing necessary funding for road and rail infrastructure in line with government expectations and timescales difficult.</i></p> <p><i>6.43 It was also noted in a number of responses that consumer access to appropriate sustainable travel solutions and environmentally beneficial mode-share targets are important considerations in the provision of surface access links to airports. Historically, there has been an emphasis on moving traffic from roads to coach and rail, however, in the longer term, government would like to consider the impact of surface access planning that incorporates likely environmentally friendly technological developments such as the use of electric vehicles.”</i></p> <p>The Airports National Policy Statement (hereinafter referred to as the ANPS) was released in June 2018, paragraph 5.9 of which placed emphasis on air quality and carbon emissions when considering airport surface access strategies.</p> <p><i>“5.9 ... The airport surface access strategy must reflect the needs of the scheme contained in the application for development consent, including any phasing over its development, implementation and operational stages, reflecting the changing number of passengers, freight operators, and airport workers attributable to the number of air traffic movements. The strategy should reference the role of surface transport in relation to air quality and carbon. The airport surface access strategy must contain specific targets for maximising the proportion of journeys made to the airport by public transport, cycling or walking ...”</i></p> <p>In December 2018 the Government published a Green Paper entitled “<i>Aviation 2050 – The Future of UK Aviation</i>” which comprised its draft Aviation Strategy, where the aim was to achieve a safe secure and sustainable aviation sector that meets the needs of consumers and of a global outward-looking Britain. The draft strategy was based on seven key themes which are set out at paragraph 1.35 of the same document, having been drawn from six core objectives highlighted in the document “<i>Beyond the Horizon: The Future of UK Aviation – Next Steps Towards an Aviation Strategy</i>” published in April of the same year. One of these seven key themes has been set out below:</p> <ul style="list-style-type: none"> • <i>Ensure that aviation can grow sustainably</i> - moving beyond an artificial ‘choice’ between growth and environmental protection by building a new partnership that actively supports sustainable growth with actions taken to mitigate environmental impacts. <p>In May 2022, the Government published “<i>Flightpath to the Future</i>” outlining a strategic framework for aviation over the next ten years. Reference was made in this document to existing policy frameworks for airport planning, being the Draft Aviation Strategy “<i>Aviation 2050: The Future of UK Aviation</i>” published in December</p>

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			<p>2018 covering all aspects of airport growth, along with the ANPS, which at the present time comprise the most up-to-date policy on planning for airport development.</p> <p><i>“Jet Zero Strategy: Delivering Net Zero Aviation by 2050”</i> was published by the Government in July of last year, and recognised the impact aviation has on global warming and the essential need to decarbonise. In terms of influencing consumers, paragraph 3.54 states:</p> <p>“3.54 Our aim is to preserve the ability for people to fly whilst supporting consumers to make sustainable aviation choices. Our focus on influencing and informing consumers is an important part of our overall approach to Jet Zero. We want to empower consumers and business to make the greenest choices when flying and by doing so, reward those parts of the sector who move quickly to decarbonise.”</p> <p>Local planning policies and the NPPF do not have specific policies governing carbon emissions derived from aviation. The role of national policy in this respect is recognised in the document <i>“Beyond the Horizon; The Future of UK Aviation – Making Best Use of Existing runways”</i> in which it is said:-</p> <p><i>“There are however some important environmental elements which should be considered at a national level. The Government recognises that airports making the best use of their existing runways could lead to increased air traffic which could increase carbon emissions.”</i> Before adding: <i>“We shall be using an aviation strategy to progress our wider policy towards tackling aviation carbon.”</i></p> <p>It can be seen that recent documents concerning Government aviation policy have sought to concentrate attention, to place increased importance on climate change, and in particular a reduction in greenhouse gas emissions and decarbonisation of the airport industry generally, in response to allowing for growth in aviation. In terms of surface access provision, the issues extend beyond whether airport related car parking should be concentrated solely on-airport, as opposed to alternative locations outside the airport’s Operational Area Boundary. A more nuanced approach is now sought in which customer choices are expected to be embodied in aviation policy, with the focus of attention concentrating on setting and adhering to CO2 emissions, improving air quality, and supporting a decarbonisation agenda, in order to reduce the impact on climate change, since it is these major factors which lie at the forefront of Government aviation policy.</p> <p>My clients are committed to these aims and are well placed as a traditional park and ride long term off-airport car park operator to assist in the reduction in vehicle emissions, reduce congestion on the local highway network in close proximity to the airport and thereby improve air quality. These are important considerations which have not been taken into account by your authority in the re-introduction of Policy GAT3.</p> <p>Suggested Modifications:</p>
REP/056 (2023)	Gatwick Airport Limited	GAT3	<p>GAT3: Gatwick Airport Related Parking</p> <p>16. We previously supported Policy GAT3 for reasons set out in paragraphs 4.1 and 4.2 of our 2020 representations. As the policy remains unchanged, we continue our support for it.</p>

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REP/087 (2023)	Woodland Trust	GAT3	<p>Policy GAT3: Gatwick Airport Related Parking We seek clarification of this policy to confirm that any future car parking provision within the airport site would not be allowed in harmful proximity to areas of ancient woodland or veteran trees. As noted in our comments on policy GAT1, the land safeguarded for future airport development includes several areas of ancient semi-natural woodlands (ANSW).</p> <ul style="list-style-type: none"> • Allen’s Wood ASNW (Grid reference: TQ3003540208) • Huntsgreen Wood ASNW (Grid reference: TQ2828540024) • Horleyland Wood ASNW (Grid reference: TQ2898240539) • Rowley Wood ASNW (Grid reference: TQ2791939226) • Unnamed ASNW at TQ2955640750 <p>The policy should be amended to ensure that no areas of ancient woodland or veteran trees are included in land to be used for carparking within the area safeguarded for future airport development. Even if the argument were to be made that the runway itself is “wholly exceptional” development as set out in the NPPF para 180c, car parking is not. We consider that this policy is not legally compliant or sound unless these areas of ancient woodland are excluded from any future development sites, with an appropriate buffer specified.</p> <p>Suggested Modifications: The policy should be amended to ensure that no areas of ancient woodland or veteran trees are included in land to be used for carparking within the area safeguarded for future airport development. Even if the argument were to be made that the runway itself is “wholly exceptional” development as set out in the NPPF para 180c, car parking is not. We consider that this policy is not legally compliant or sound unless these areas of ancient woodland are excluded from any future development sites, with an appropriate buffer specified</p>
REP/056 (2023)	Gatwick Airport Limited	GAT4	<p>GAT4: Employment Uses at Gatwick 17. We previously supported Policy GAT4 for reasons set out in paragraphs 5.1 and 5.2 of our 2020 representations. As the policy remains unchanged, we continue our support for it.</p> <p>Suggested Modifications:</p>
REP/154	DWDLLP on behalf of AITUP	GAT4	<p>Gatwick Airport Boundary: AIPUT recognise Viking House remains within the airport boundary in the Local Plan which is considered appropriate in planning and land use terms.</p>

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			<p>AIPUT has lodged enquiries with GAL as to why Viking House is also included in the draft Order Limits for the Northern Runway DCO Application, and has received notification that the land or rights over the land could potentially be compulsorily acquired by GAL. There is no apparent case or need for its inclusion in the DCO Application since none of the plans in the Summer 2022 GAL DCO consultation show works here. In principle an application for compulsory acquisition powers would not have justification. AIPUT is best placed to renew and update its asset to ensure it continues to serve current and future airport needs, and this underlines the need for the requested amendments to Policy GAT2 set out above.</p> <p>Policy GAT4 provides for the loss of airport-related employment floorspace within the airport boundary where it can be demonstrated that development will not have a detrimental impact on the long term ability of the airport to meet its operational needs. It is recognised in the reasoned justification that recent years have seen an increasing level of vacant office within the airport, largely due to the changing needs of airlines and businesses alike. AIPUT endorse this, with changes including new ways of working (such as the rise of remote working), temporary changes to passenger demand, and evolving occupier requirements. This suggests that GAT4 should not be predicated upon long term predictions of airport operational needs or airport growth, since doing so may inadvertently fail to provide for more immediate general employment floorspace needs that are appropriate in all other respects.</p> <p>Suggested Modifications: The following amendments to GAT4 are proposed: <i>“New non-airport related employment floorspace within the airport boundary will only be permitted where it can be demonstrated that:</i> <i>i. this will not have a detrimental effect on the long-term ability of the airport to meet its <u>immediately foreseeable</u> land and floorspace requirements necessary to meet the needs of the airport as it grows; and</i> <i>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.”</i></p>

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REP/150	90 North Group Limited	IN2 and TC1 and TC2	<p>Due to the projected population increase in the Crawley area, especially amongst children, I do not consider the current allocation of educational establishments, (primary, secondary and further higher education) will service the area properly, and greater consideration and planning needs to be given to service this logistical requirement.</p>
			<p>Suggested Modifications:</p> <p>I would like to propose and encourage the wording of the Local Plan Policy will encourage and look more favourably upon future planning applications for new education establishments, especially from owners of existing high street retail property that might cover sufficient areas that could cater for educational use, and which have been unoccupied and/or vacant for more than say 2 continuous years.</p> <p>I would also like to propose and see the site known as '100 High Street, Crawley, RH10 1BZ (former Morrisons Supermarket)', which falls under this category is zoned as a future site for education on the Local Plan Map. Interest for educational use on this particular property site is already being shown, but an actual local plan zoning will help to accelerate this opportunity. This in turn will help to elevate a long standing retail vacancy which has been remarketed for let for over 3 years without any success. It will then also help to discourage homelessness, drug use and anti-social behaviour that is currently occurring in this part of the town centre.</p>
REP/033 (2023)	Horsham District Council	TC3	<p>Strategic Policy TC3: Development Sites within the Town Centre Boundary</p> <p>We support this policy in principle, and particularly welcome the increase in the target for residential net completions from 499 to 1,500 on the Town Centre Opportunity Sites. However, we consider it is not justified as stands.</p> <p>Our reading of the SHLAA proformas suggests that assessments of net site capacities have in many cases been based on history of planning applications, pre-applications or masterplans. This is not unreasonable, particularly taking account of the need for a proportionate evidence base. However, given the context where the Local Plan is proposing to provide well below assessed housing needs, it is not clear from the assessments whether there are other opportunities to maximise site capacities and if so how they have been explored. This may be picked up in other evidence base documents –for example this may have been considered as part of the viability assessment work or as part of the assessment of alternatives as part of the SA/SEA process.</p> <p>We also note that the reasoned justification (paragraph 11.24) advises that the retail capacity figures are considered to provide a sufficiently precautionary forecast of retail capacity for the Local Plan period to 2040. This might suggest that a greater proportion of residential units is achievable in the town centre, albeit balanced with the need to keep the town centre 'alive'.</p>

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			<p>Suggested Modifications: Change sought: The SHLAA assessment documentation should provide further explanation regarding any assumptions or other evidence base documents used to ensure that the assessments are clear as to why the residential capacities are considered optimal and cannot be pushed up further, together with clarification on how alternative mixes of use and/or densities have been considered. It is considered this additional information would help ensure that the overall number of dwellings proposed is clearly justified and demonstrate there is a maximum contribution that has been made in reducing unmet housing need within the wider HMA.</p>
REP/163	Vail Williams on behalf of Chichester College Group	TC3	<p>Response on behalf of Chichester College Group to Crawley Borough Council Local Plan Review 2024 - 2040 Regulation 19 Local Representations Further to our previous representations to Regulation 18 and 19 of the Crawley Borough Local Plan Review, we are writing on behalf of our clients Chichester College Group regarding their site at College Road, Crawley.</p> <p>In line with our previous Regulation 18 & Regulation 19 representations, we still wish all previous comments to be considered by CBC and the Inspector, and these additional comments should be read in association with all our previous submissions.</p> <p>As you are aware, ongoing work continues under One Public Estate between the College, the Crawley Borough Council and West Sussex County Council as adjacent landowner, in regard to how the three sites at the Town Hall, County Buildings and the College form the Eastern Gateway.</p> <p>Our main areas of comment relate to the Regulation 19 Local Plan Review Document and its supporting evidence base, primarily the Heritage Report by Place Services the May 2023 Sustainability Appraisal.</p> <p>Town Centre Opportunity Sites: Policy TC3 We note that our clients site remains as an allocated under Policy TC3 as a Town Centre Key Opportunity Sites and we welcome the inclusion, which reflects our ambition to retain education uses on the south of the site and redevelopment opportunities on the north of the site. We also support the wording that reiterates this mixed use for the site as “<i>Crawley College (mixed use development with priority for education)</i>”.</p> <p>Following our Masterplan work with your officers and members, we confirm that we agree that the Masterplan adopted 2019 ensures that in line with Policy Tc3 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.</i>”</p> <p>We also note that if there is a scenario where no residential development is proposed, that “<i>the development will not undermine the delivery of a minimum of 1,500 net dwellings cumulatively across the sites</i>”.</p> <p>Following the STEM application and its s106 we are aware that “<i>any development must accord with an appropriate master plan agreed with the Local Planning Authority and covering the whole campus and will be</i></p>

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			<p><i>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.</i></p> <p><i>We also support the policy reconfirming that “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.”</i></p> <p>In regard to Policy H2 on Town Centre Housing sites: Key Housing Sites we note that our site as a Town Centre Key Opportunity Sites is expected cumulatively to provide 1,500 net dwellings alongside Telford Place, Crawley Station and Car Parks (deliverable), County Buildings (developable), Land North of the Boulevard (deliverable) and Crawley College (developable) as well as Cross Keys (developable) and MOKA (which is currently under construction).</p> <p>We also note that in the appendices the Housing Trajectory - Base Date 31 March 2023 highlights a potential of 363 units in line with Crawley College Adopted Masterplan June 2018.</p> <p>Regarding the Sustainability Appraisal, May 2023: Assessment of Town Centre Key Opportunity Sites (Policies H2 and TC3), we note the allocation on the College site scores positively particularly regarding Objective 3. <i>“Protect and/or Enhance the Built Environment: The site is located within the Town Centre and residential and/or mixed-use development would be in keeping with Local Plan objective of increasing residential development in the Town Centre and promoting its overall vitality and viability”, whilst “Good quality design could enhance the built environment”. We agree with the Positive Impact score (+) and the Conclusions which state that “The site is a brownfield site, offering good opportunities for high quality residential development/mixed use development including education, in a sustainable location.”</i></p> <p>Regarding Objective 4, we will continue to work with the council to consider the correct mix and tenure of units, at the time of any formal planning application, and note policy requirements for Decent/ Affordable Homes, and the policy requirement of 40% affordable subject to viability.</p> <p>Suggested Modifications:</p>
REP/168	Network Rail	H2 – Crawley Station Car Park	<p>There are continued concerns over the inclusion of the car park at Crawley Station as part of the Town Centre Key Opportunity Sites. There appears to be no proposals for the reprovision of the car park serving the rail station should the existing be lost. Whilst Network Rail encourages active and sustainable modes of transport to access the station, there remains a need for those who are unable to access other modes to be able to drive and park close to the station. The removal of this modal choice impacts negatively on the diversity of offer for those accessing the station and we would encourage the Council to address this issue. Any loss of the car park would conflict with draft policy IN1 which sets out that ‘existing infrastructure services and</p>

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			<p>facilities will be protected....unless there is sufficient alternative provision of the same type in the area, or an equivalent replacement'.</p> <p>Suggested Modifications:</p>
REP/168	Network Rail	TC3 H2 – Town Centre Key Opportunity Site	<p>Further, Network Rail suggest that where development occurs close to Crawley station, within the identified Opportunity site, that consideration is made to securing improvements to the station to support the anticipated increased use of this as a result of potential development that would come forward. Reference to securing developer contributions to support these improvements, both at Crawley station and others in the Borough should be included in the Infrastructure Plan.</p> <p>Suggested Modifications:</p>
REP/165	DT Last Mile Retail (Crawley) Unit Trust (Agent: Quod)	TC5	<p>Draft Crawley Borough Draft Local Plan 2024-2040 (Regulation 19) Comments prepared on behalf of DT Last Mile Retail (Crawley) Unit Trust We are instructed by our client, DT Last Mile Retail (Crawley) Unit Trust to submit the enclosed representations to the consultation on the Regulation 19 version of the Crawley Borough Local Plan Review.</p> <p>DT Last Mile Retail (Crawley) Unit Trust is a key stakeholder in the Borough, being the freehold owners of County Oak Retail Park ('CORP'), which is located on London Road, Crawley. CORP comprises a well-established purpose-built retail destination complementing the existing offer within Crawley town centre forming part of the local shopping hierarchy, reducing the need for residents to travel outside the Borough – as acknowledged by the Council's retail evidence base¹. CORP is also a key employer in the local area, providing c. 370 jobs.</p> <p>DT Last Mile Retail continue to look on maintaining and improving the 'offer' of CORP and ensuring that it remains a key attractor for residents, providing consumer choice and an important source of employment in the local area.</p> <p>It is in this context that the representations have been prepared.</p> <p>1 Policy TC5 Town Centre First This draft policy deals specifically with retail proposals in edge-of-centre and out-of-centre and reflects the National Planning Policy Framework ('NPPF') in promoting the 'town centre first approach' when assessing retail proposals.</p> <p>Draft Policy TC5 requires retail proposals in edge of centre or out of centre location to satisfy the sequential approach to site selection and dependent upon scale the impact test. With regard to the impact test, the Policy states that: "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."</p>

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			<p>This impact threshold compares to the default threshold set by the NPPF of 2,500 square metres. The NPPF threshold is also applied by adopted local planning policy – as set out at Policy EC7 of the adopted Crawley Borough Local Plan (2015).</p> <p>Consequently, the emerging Local Plan Review is seeking a substantial reduction in the impact threshold from that within adopted planning policy, and therefore must be robustly justified.</p> <p>In seeking to set this lower threshold, the reasoned justification to Policy TC5 (at paragraph 11.40) states that: “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 outof-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.”</p> <p>This position has been informed by Crawley Borough Council’s (CBC) latest retail evidence base – the ‘Retail, Commercial Leisure & Neighbourhood Town Centre Neighbourhood Needs Assessment’ (hereafter referred to as ‘the 2020 Retail Study’) published in January 2020.</p> <p>The 2020 Retail Study² provides advice on setting a locally set threshold across the Borough and the principal justification for applying the 500 square metres figure can be summarised as follows:</p> <ul style="list-style-type: none"> ▪ The average unit size within Crawley town centre is identified to be 294 square metres, with units ranging from 10 square metres to 8,430 square metres. ▪ The average convenience retail commitment measures 280 square metres and the average comparison retail commitment measures 694 square metres. ▪ Crawley town centre’s market share for residents in the Borough has decreased since 2010 – from 30.4% to 13.8% in the convenience (largely food and drink) goods sector and from 42.6% to 23.1% in the comparison (non-food) goods sector. The 2020 Retail Study suggests that this decline could continue and impact on the vitality and viability of the town centre. ▪ Past appeal and Secretary of State decisions have dismissed applications for retail proposals of just 121 square metres and 261 square metres respectively. ▪ Due to the potential necessity for larger retail units within Crawley town centre (such as the former Morrisons) to be sub-divided to provide flexible retail units more suitable to modern retailing.

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			<p>For these reasons the 2020 Retail Study concluded that centres across the Borough are potentially vulnerable to competing edge-of-centre and out-of-centre retail developments that would jeopardise the vitality and viability of the centres. As such, the 2020 Retail Study recommended a flat locally set threshold of 500 square metres across the Borough. This recommendation has subsequently been replicated in the under draft Policy TC5 of the emerging Local Plan.</p> <p>In reviewing the justification put forward within CBC's retail evidence, this fails to provide robust evidence base to support setting a blanket 500 square metre impact threshold figure for the Borough, which represents a significant reduction from the current position (of 2,500 square metres). A number of the perceived concerns raised by the 2020 Retail Study (and replicated in the emerging Local Plan) will be addressed by the need for retail proposals in edge-of-centre and out-of-centre locations having to satisfy the sequential approach to site selection rather than through the introducing a local impact threshold of 500 square metres. For example, in terms of the future reletting and / or sub-division of the former Morrisons unit, which is currently vacant and extends to more than 7,200 square metres. Importantly, the sequential approach applies for all retail proposals regardless of scale.</p> <p>Significant weight is also made in seeking to justify the lower threshold to the suggestion that Crawley town centre's market share has declined substantially when compared to earlier retail evidence prepared on behalf of CBC. In particular, the 2020 Retail Study, which was underpinning by a household survey completed in 2019, has been compared to the findings of an earlier household survey completed in 2010, which informed the earlier 2010 Retail Study and subsequent 2013 Retail Update also prepared on behalf of CBC. Drawing upon this evidence, the 2020 Retail Study suggested that the food and non-food market share of Crawley town centre for residents in the Borough has declined substantially since 2010.</p> <p>Direct comparisons between household surveys should be treated with a note of caution as they simply represent a snapshot in time on broad shopping patterns.</p> <p>Furthermore, in comparing the two household surveys undertaken in Crawley the following should be noted:</p> <ul style="list-style-type: none"> ▪ The Study Areas applied are not the same. Although the overall geographical area is the same, the 2010 household survey was based on 12 zones, whereas the 2019 household survey was based on 13 zones. This included subdividing the 'Crawley Zone' to include an additional zone around the Town Centre Boundary only. The survey areas are therefore not directly comparable. ▪ The format of the questionnaire for both household surveys differs. This will also mean that direct comparisons should be treated with caution and are not directly comparable. For example, the 2019 household survey asked respondents where they 'last' went for food shopping for their main food and top-up shopping. In contrast the 2010 household survey asked where respondents do 'most' of their main food or top-up shopping. Similarly, for non-food goods, the 2010 household survey asked some different questions to the 2019 household survey. This includes the 2010 household survey splitting down electrical products to

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			<p>audiovisual goods and household appliances, whereas the 2019 household survey asking a single question for all electrical goods. Likewise, the 2020 household survey broke downs 'Books, DVDs, CDs' and 'Toys, Bicycles, Recreation al Goods' separately whereas the 2010 household survey grouped all these goods together.</p> <p>Notwithstanding our concerns of directly comparing household surveys with different approaches, in identifying the convenience market share of Crawley town centre, the 2013 Retail Update (which is basis of the comparison of market shares identified by the 2020 Retail Study) included Asda on Peglar Way within Crawley town centre. In contrast, this store was not included within Crawley town centre in the 2020 Retail Study³ when comparing changes in market shares. By including the Asda store to, Crawley town centre's market share in 2020 increases from 13.8% to 26.5%.</p> <p>By comparing on a like-for-like basis, the decline in the convenience market share of Crawley town centre is not as significant as suggested (instead declining from 30.4% to 26.5%). This will be partly explained by the differences in approach of the two household surveys, rather than suggesting a dramatic decline in the role and function of Crawley town centre. It is also worth noting that the vitality and viability of the Town Centre is not underpinned by if food retailing offer.</p> <p>With regard to non-food shopping, again drawing upon the findings of the 2020 Retail Study, the draft Local Plan refers to the market share of Crawley town centre declining in seeking to justify setting the lower threshold. The 2020 Retail Study suggested that this decline has been significant – reducing from 42.6% in 2010 to 23.1% in 2020⁴ .</p> <p>However, this decline in market share is not as significant as being suggested by the 2020 Retail Study and does appear to be an error. Elsewhere within the 2020 Retail Study the market share of Crawley town centre for residents in the Borough is identified to be much higher at 40.5%⁵ . Indeed, Paragraph 2.63 identified that: "The results show that Crawley Town Centre attracts the greatest proportion of comparison spending from Crawley residents (40.5%)."</p> <p>This market share for Crawley town centre (40.5%) is comparable to that identified by the findings of the 2010 household survey (42.6%) and does not identify a significant decline in market share – as suggested by the 2020 Retail Study. Again, this marginal difference can be explained by the differing approaches in the 2010 and 2019 household surveys.</p> <p>Nevertheless, even based on this marginal reduction in market share, the 2020 Retail Study (para. 2.65) went on to conclude that: "Non-bulky goods such as clothing and footwear, and recreation goods show a high level of retention to the Town Centre, which is indicative of its strength as a retail destination..." (our emphasis)</p>

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			<p>The evidence identifies that Crawley town centre has largely retained its market share within the Borough (particularly for non-food shopping which is the focus of the town centre's retail offer) and achieves a 'high level' of retention. We would question that the modest changes in market share justifies such a substantial reduction in the impact threshold being proposed within the Local Plan Review.</p> <p>Likewise, the reference to historic past planning appeals in Luton and Tower Hamlets, as referred to in the 2020 Retail Study, has no relevance to setting a local impact threshold for Crawley and justifying a threshold of 500 square metres. There are numerous examples where Planning Inspectors / Secretary of State decisions have supported retail proposals well above the default threshold of 2,500 square metres set by the NPPF. Whether any impact is likely to be significant will be dependent on the local circumstances.</p> <p>The NPPF does allow local planning authorities to set a lower threshold. However, the proposed threshold represents a significant reduction from the current position, appears arbitrary and for all the reasons outlined is not justified by robust evidence.</p> <p>Instead, the Planning Practice Guidance ('PPG') that supports the NPPF outlines a number of considerations that should be considered in setting a threshold. In particular, the PPG6 states that it will be important to consider the following:</p> <ul style="list-style-type: none"> ▪ scale of proposals relative to town centres ▪ the existing viability and vitality of town centres ▪ cumulative effects of recent developments ▪ whether local town centres are vulnerable ▪ likely effects of development on any town centre strategy ▪ impact on any other planned investment <p>Based on these considerations and drawing upon the findings of CBC's retail evidence, there is no justification for setting such a low impact threshold.</p> <p>For example, in terms of understand the existing viability and vitality of Crawley town centre the 2020 Retail Study concluded that it is 'performing well', with a 'healthy mix of retail and service uses', 'low vacancy rates' and 'resilience in the comparison goods sector'⁷. This does not suggest that Crawley town centre is particularly vulnerable to justify the need to set such a low threshold.</p> <p>Linked to this, in terms of the cumulative effect of recent developments, these do not appear to have adversely impacted upon the vitality and viability of Crawley town centre – as reflected by the findings of the 2020 Retail Study and the fact that the Town Centre has largely retained its market share.</p>

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			<p>Against this background, there is no justification to support such a substantial reduction in the impact threshold as being proposed. This lack of evidence means that the approach of draft Policy TC5 is not justified, and the emerging Local Plan cannot be deemed to be sound, contrary to Paragraph 35 of the NPPF.</p> <p>2 Summary These representations demonstrate that draft Policy TC5 of the emerging Local Plan Review is not justified, and therefore not sound.</p> <p>The lower threshold being suggested of 500 square metres represents a substantial reduction to the existing position of adopted planning policy (at 2,500 square metres). Such a reduction in the impact threshold needs to be supported by robust justification. As has been demonstrated this justification is lacking and instead the suggested impact threshold is simply an arbitrary figure that is not supported by any robust evidence.</p> <p>Suggested Modifications: Within this context, draft Policy TC5 should be amended as follows (revised text in bold and underlined): “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 <u>2,500sqm</u> gross floorspace or greater.”</p> <p>Linked to this, Paragraph 11.40 within the supporting text to this policy should also be deleted.</p>

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REP/055 (2023)	Gatwick Green (Wilky)	Employment Land Trajectory	<p>1.0 Introduction</p> <p>1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of the The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. The representation relates to the Employment Land Trajectory (ELT) in the Draft Crawley Borough Local Plan, 2031 (DCBLP).</p> <p>1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The plan at Appendix 1 shows the extent of GGL's land and the proposed allocation of Gatwick Green. The land has been promoted by TWG/GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) (the Site) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 The ELT is based largely on evidence contained in the Council's Employment Land Availability Assessment (ELAA³³) and is reflected Topic Paper 5 (Employment Needs and Land Supply³⁴). This representation cross-refers to these documents.</p> <p>Executive Summary</p> <p>1.4 Gatwick Green is suitable, available, viable and therefore deliverable. GGL has unencumbered ownership of all the land within the allocation area . GGL also has sufficient funding and will draw in additional funding via a development agreement / JV so that the finance is in place to ensure the Site can be developed in a sustainable and comprehensive manner. The Council's viability assessment and Savills' review demonstrate that development as envisaged in DCBLP policy is viable and deliverable. GGL is therefore able to deliver the development of Gatwick Green.</p> <p>1.5 The ELT contains a number of elements relating to Gatwick Green that need to be amended in order for it to be sound against the tests in the National Planning Policy Framework (NPPF, 2021). These elements relate to (1) the amount of employment land and floorspace attributed to the Site, and (2) the approach to the amount of development attributed to the Site and its expression as a 'minimum'. GGL's representation on Strategic Policy EC1 sets out robust evidence based on the Economic Growth Assessment (EGA), Topic Paper 5, and Savills' report³⁵ on the market demand for Industrial and Logistics (I&L) in Crawley</p>

³³ Employment Land Availability Assessment, Crawley Borough Council, 31 March 2023 (Base Date 31 March 2023)

³⁴ Crawley Borough Local Plan Topic Paper 5: Employment Needs and Land Supply, Crawley Borough Council, May 2023

³⁵ Strategic Industrial & Logistics – Market-demand forecast for Crawley, Savills, June 2023

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			<p>which concludes that the level of need is about 69 ha, which equates to an outstanding need for about 59.8 ha. The ELT needs to reflect this level of need in relation to Gatwick Green.</p> <p>Key Considerations for the ELT</p> <p>1.6 This representation will provide evidence to demonstrate that Gatwick Green can be delivered over the period of the DCBLP. It will therefore address the key headings in the ELT and respond to each of these with regard to the revised / updated evidence attached to GGL's representations on Strategic Policies EC1 and EC4, and based on the relevant policies contained in the DCBLP:</p> <ul style="list-style-type: none"> • Suitability of the site for employment development. • Availability of the site for employment development over the early part of the DCBLP period. • Achievability of development over the early part of the DCBLP period. • The viability of delivering employment on the Site. • The scale of employment development identified for the Site. • The time-frame for the delivery of employment development identified for the Site. <p>1.7 In the context of the urgent need to plan and provide for the unmet and long-standing employment and economic needs of the Borough – significantly in the context of the COVID-19 pandemic – and the removal of safeguarding of the Site, evidence is put forward to demonstrate that Gatwick Green is viable and deliverable.</p> <p>2.0 Policy tests</p> <p>2.1 Planning Practice Guidance (PPG) requires that sites that are put forward for development in Local Plans must be suitable, available and achievable for economic development over the plan period. The assessment should identify the sites and broad locations with potential for development, assess their development potential and then assess their suitability for development and the likelihood of development coming forward (their availability and achievability) (Paragraph: 001 Reference ID: 3-001-20190722). These tests are addressed below.</p> <p>Suitability</p> <p>2.2 Gatwick Green is a highly suitable site for strategic employment. In view of its close proximity and accessibility to the M23 and Gatwick Airport, it is well suited to bringing forward a high-quality logistics hub to optimise the potential of this strategic and sustainable location at the confluence of several national transport infrastructure networks – Gatwick Airport, London-Brighton Mainline Rail, the Gatwick Express service, the M23 motorway and the Crawley-Gatwick-Horley Fastway bus service. A review of the Industrial & Logistics (I&L) market by Savills Economics on behalf of GGL forms Appendix 2 to GGL's representation on Strategic Policy EC1. It sets out market evidence that supports the Council's positive economic strategy and the approach to increasing the supply of employment land through the allocation of Gatwick Green. Savills Economics has also undertaken an assessment that shows how Gatwick Green</p>

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			<p>is complementary to the key Main Employment Areas in Crawley and the planned Horley Business Park north of the M23 spur road in Reigate and Banstead Borough (Appendix 4 to GGL's representation on Strategic Policy EC1).</p> <p>2.3 The Savills review identified a series of trends and structural changes in the economy that are driving growth in the Industrial and Logistics (I&L) market. The market is growing in the more peripheral parts of the country away from the traditional midlands base and providing a greater diversity, and enhanced quality, of employment opportunities. Against this background, the I&L sector is severely underrepresented in Crawley compared to other markets and areas, and in particular when compared to markets around major airports. In these circumstances, and given the constrained supply of suitable sites for major B8 uses around Crawley, the demand for a high-profile site in Crawley with access to the Strategic Road Network (SRN) is very strong. This market analysis supports the empirical assessment of employment land needs contained in the Council's Economic Growth Assessment Supplementary Update for Crawley³⁶ (EGA SU), Topic Paper 5³⁷ and Savills assessment of market demand for strategic I&L uses referenced at para 1.5.</p> <p>2.4 The Site is not affected by any significant environmental, physical or heritage constraints and could be developed within the current / future aircraft noise environment and aerodrome safeguarding requirements relating to the Airport. A number of evidence based reports were prepared to support the allocation of Gatwick Green for strategic employment. The reports formed Appendices to GGL's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) and form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). These reports have been supplemented by addenda and fresh evidence to reflect the revised policy framework in the DCBLP and other changes in circumstances since the original appendices were prepared.</p> <p>2.5 The reports, addenda and evidence conclude that there are no significant impediments to the Site's development, subject to the inclusion of a range of sustainability and mitigation measures to address either policy requirements or site-specific circumstances. The reports/addenda/evidence cover transport, flood risk, surface water drainage, foul drainage and sewage treatment, water supply, utilities, air quality, noise, ground conditions, renewable energy, landscape & visual, heritage, and ecology & hedgerows.</p> <p>2.6 The reports/addenda/fresh evidence are appended to the representation on behalf of GGL on Strategic Policy EC1 (Appendix 2 and Appendix 4) and Strategic Policy EC4 (Appendix 2 and Appendices A - E of Appendix 3), and comprise:</p> <ol style="list-style-type: none"> 1. Strategic Industrial and Logistics, Market Demand Forecast for Crawley

³⁶ North West Sussex, Economic Growth Assessment, Supplementary Update for Crawley, Lichfields, January 2023

³⁷ Topic Paper 5, Employment Needs and Land Supply, Crawley Borough Council, ,May 2023

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			<p>2. Strategic Industrial and Logistics – Location and Complementarity</p> <p>3. Outline Transport and Access Appraisal – evidence by Empiric Partners and Steers Group</p> <p>4. Addendum: Environmental and Utilities Preliminary Assessment report</p> <p>5. Preliminary Ecological Appraisal (PEA) report</p> <p>6. Addendum: Hedgerow Regulations Assessment report</p> <p>7. Addendum: Landscape Character and Visual Appraisal report</p> <p>8. Addendum: Heritage Constraints Appraisal report</p> <p>2.7 The evidence presented by GGL through its various representations demonstrates that Gatwick Green can be designed and developed such that it can be fully compliant with the development control requirements in Strategic Policy EC4 – the key elements of which are:</p> <ul style="list-style-type: none"> • Gatwick Green can deliver a highly sustainable pattern of movement and access consistent with guidance in the NPPF and the Council’s sustainable transport strategy. • Gatwick Green can be developed in a way that achieves sustainable drainage design and construction / operation in accordance with specific policies on flood risk, drainage and sustainability. • As a new-generation storage and logistics development, Gatwick Green will incorporate future-proofed digital communications in accordance with Policy IN3 (Supporting High Quality Communications). • Evidence contained in appendices to this representation confirm that Gatwick Green can be developed with appropriate avoidance and mitigation measures so as to respect the various environmental values in and around the Site. • There is a high level of complementarity between Gatwick Green and other existing and planned strategic employment sites in and near to Crawley. • Gatwick Green is viable and deliverable in accordance with the provisions in Strategic Policy EC4. <p>2.8 Gatwick Green is also complementary to Gatwick Airport’s growth plans in its Master Plan 2019, including the DCO for the use of the standby runway and the longer term possibility of an additional wide-spaced southern runway. Evidence in this regard is contained in Savills representation on behalf of the GGL on Policy GAT2.</p> <p>2.9 Overall, the site is considered to be highly suitable for strategic employment, supported by evidence from Savills Economics, and other technical reports relating to infrastructure and environmental considerations.</p> <p>Availability</p> <p>2.10 GGL owns all the land in the proposed to be allocated under Strategic Policy EC4 and as shown on the Local Plan Map. GGL also confirms that the Site is unfettered by any significant encumbrances on title that could affect the comprehensive development of the Site – in this context, the Site could</p>

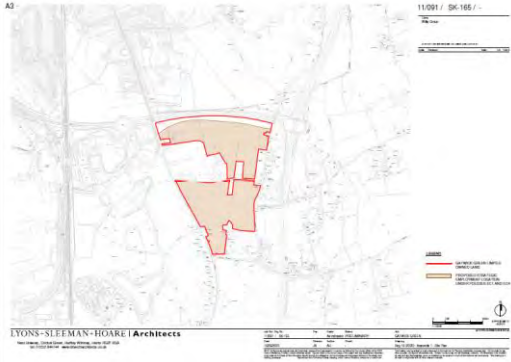

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			<p>accommodate employment development based on a gross allocation area of 44 ha of land, delivering a net developable area that reflects all the requirements of Strategic Policy EC4 (c - v). The Site can therefore be developed in a comprehensive and phased way, including the provision of enabling infrastructure. GGL's ownership of the whole allocation and land south of the M23 spur road required for access purposes therefore ensures that the Site is available and that in this regard there are no risks to the delivery of development within the early part of the Plan period.</p> <p>2.11 The GGL representation on Policy GAT2 justifies the provision of the northern access road to Gatwick Green within the Safeguard Land south of the M23 spur road – this in turn could also form the part of the future diversion of Balcombe Road in the event that Gatwick Airport decided to develop an additional wide-spaced southern runway. The arrangement offers significant resource and land-efficiency benefits alongside providing part of the future highway infrastructure associated with a future wide-spaced runway. GGL owns all the land within this Safeguarded Land area south of the M23 spur road, so it is available to GGL to deliver this highway infrastructure in a manner compliant with the future development of an additional runway at Gatwick.</p> <p>Site capacity</p> <p>2.12 A Development Framework Plan (DFP) (Appendix 2) has been prepared to illustrate the framework within which the Site can deliver an industrial-led development or predominantly B8 storage and distribution uses in accordance with the development management requirements of Strategic Policy EC4. The DFP also shows the Site's ability to incorporate a range of sustainable transport and environmental requirements arising out of national and local planning policy and other statutory requirements. Feasibility work confirms that the DFP could deliver at least 77,800 sqm of floorspace within an overall Site of 44 ha in a sustainable and environmentally acceptable manner. There are therefore no impediments to the Site accommodating employment development within the 44 ha in accordance with the requirements of Strategic Policy EC4 and other policies in the DCBLP.</p> <p>2.13 The DFP illustrates the framework for an integrated industrial-led development and co-ordinated transport and green infrastructure solution within the overall Site of 44 ha. The Site could therefore include integrated transport, green infrastructure and Sustainable Urban Drainage (SuDS) solutions within the overall 44 ha, along with I&L development. The feasibility work has confirmed that the development would comprise the following:</p> <ul style="list-style-type: none"> • Development predominantly Use Class B8 with some Use Class B2 – storage and distribution and general industrial uses. • Ancillary / incidental uses under Use Class E – office, business and services uses. • Supporting education uses for apprenticeships & staff training. • An amenity hub to provide support facilities for staff.

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			<ul style="list-style-type: none"> • An integrated green infrastructure framework – landscape, biodiversity, amenity space to address the objectives of the Biodiversity Opportunity Area and the requirement for Biodiversity Net Gain. • Sustainable mobility at the heart of the concept: <ul style="list-style-type: none"> ○ Two bus super hubs to facilitate modal switch and a high level of service for users. ○ A sustainable transport route through the site offering a high level of service for buses (notably the Fastway bus service), pedestrians and cyclists. ○ Ancillary car parking with Electric Vehicle Charging facilities. <p>2.14 Gatwick Green represents a strategic opportunity to bring forward a highly sustainable strategic mixed-use employment area, offering a unique opportunity to deliver significant benefits to all three of the key components of sustainability noted in the NPPF.</p> <p>2.15 The Site will have a focus on B8 use class floorspace, but will also accommodate some industrial development. This may help the site to come forward more quickly given its wider appeal to a number of different market sectors. Gatwick Green can deliver about 630 construction jobs over 2 years and about 1,500 permanent on-site operation jobs – research by Savills Economics shows that the I&L sector can deliver a variety of high quality employment opportunities given the highly automated and sophisticated nature of new-generation logistics operations, so helping to transform and rebalance the economy of Crawley, to the long-term benefit of the local community.</p> <p style="text-align: center;">Viability</p> <p>2.16 The Council's plan-wide viability assessment³⁸ has concluded that <i>“The Gatwick Green site appears to have the potential to support a more certain or stronger viability outcome, with a wide range of our sensitive tests producing RLVs either well in excess of greenfield land values on the established EUV+ basis again, and values representing serviced, ready to develop industrial land (equivalent to PDL values) also potentially supportable.”</i></p> <p>2.17 Savills Economics undertook a review of the Council's viability assessment in 2021 (Appendix 3) which supports the Council's findings and concludes that <i>“We agree with the overall conclusion of the viability evidence that the proposed Gatwick Green allocation is deliverable and generates a Residual Land Value in excess of Greenfield Land Values of circa £250k per gross hectare, which we consider reasonable for high level viability testing. We do note however the upper Greenfield Land Value of £500k per gross hectare is higher than typically applied in Local Plan and CIL viability testing.”</i></p>

³⁸ Crawley Borough Council Local Plan Review: Whole Plan Policies & CIL Viability Assessment – Final Report Issued March 2021 (DSP19682 – Final v8), DixonSearle Partnership, March 2021

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			<p>2.18 Based on the development profile noted at paragraph 2.15 above and in accordance with the provision of Strategic Policy EC4 and other policies of the Plan, Gatwick Green represents a viable development opportunity, which will have a positive internal rate of return and benefit from offering a positive economic rate of return.</p> <p>Delivery timeframe</p> <p>2.19 Gatwick Green could be developed as an industrial-led proposal for predominantly B8 uses that achieves an appropriate build-out rate; can be parcelled up and phased to de-risk delivery; can benefit from agglomeration, and can deliver wider economic benefits. On this basis, it is considered that the market could support a build-out in accordance with that noted in the ELT, i.e. over years 3 - 11 of the Plan and completion in 2035. Evidence by Savills Economics suggests that the market could support the delivery of the Site over this period given the strong and ongoing demand for large logistics and industrial units at Crawley/Gatwick. The DCBLP rightly contains no policy to constrain the timing or phasing of the delivery of the proposal. However, the DCBLP does note at para 9.58 that the Council anticipate that the proposals could be built out over a 7 to 10 year period with completion in 2040. Based on GGL's assessment and advice from Savills, it is considered that the build-out period would be about 8 years, but with completion 5 years earlier than 2040 (i.e. over 2027 to 2035). To reflect the economic evidence, GGL has sought an amendment to para 9.58 of the DCBLP to reflect its position on the timing of the Site's delivery. Evidence put forward by GGL shows that Gatwick Green is available now to meet the shortfall in industrial land.</p> <p>2.20 Based on current and foreseeable market conditions and occupier demand, GGL anticipates advancing a planning application in 2025, assuming Strategic Policy EC1 and EC4 are confirmed in the adopted DCBLP. Early work has already commenced in this regard in terms of site surveys, which will be updated as necessary alongside other technical investigations: these will inform the preparation of early conceptual plans for public consultation to inform the masterplan required under Strategic Policy EC4.</p> <p>Conclusions</p> <p>2.21 In conclusion, Gatwick Green represents a regionally and nationally significant opportunity for a high quality industrial-led development for predominantly storage and distribution uses to address Crawley Borough's growing deficit of employment land for strategic I&L uses as identified in its employment land evidence base. Gatwick Green can therefore be delivered within the Plan period for the following reasons:</p> <ul style="list-style-type: none"> • GGL controls all the land within the area allocated for Gatwick Green. • There is a small part of the site subject to an encumbrance on title – this would not materially affect the development of the site or the delivery of significant amount of employment land.

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			<ul style="list-style-type: none"> Given the significant interest GGL has received from occupiers, investors and funders, it is confident that the proposals can be developed in a sustainable and comprehensive manner, subject to the site being allocated in the DCBLP. GGL has sufficient funding and will draw in additional funding via a development agreement / JV so that the finance is in place to ensure the Site can be developed in a sustainable and comprehensive manner. <p>3.0 The ELT</p> <p>3.1 The ELT notes the amount of developable land and floorspace the Site is expected to deliver – this being a minimum of 13.73 ha and consequently 41,315 sqm of floorspace. This level of development is not supported by the overall evidence on the need for employment land.</p> <p>3.2 GGL has set out the robust evidence on the future need for land for I&L uses in its representation on Strategic Policy EC1. The evidence comprises Council’s EGA SU, Topic Paper 5 and Savills additional market-informed forecast for I&L floorspace in Crawley, particularly for large to very large units of 100,000 sq.ft to 250,000 sq.ft or more. Collectively, this evidence provides a comprehensive economic evidence base for the DCBLP that is fully compliant with the requirements of the NPPF and PPG. The evidence is in the form of:</p> <ul style="list-style-type: none"> The EGA SU – This identifies a baseline level of need based on current metrics that provides a labour demand forecast equating to a future overall land need of 22.9 ha. Topic Paper 5 – This identifies the qualitative evidence based on market evidence that demonstrates that with reference to a range of market evidence from a variety of independent sources, there is significant demand for strategic B8 distribution and warehouse development which is far in excess of the baseline labour demand forecast in the EGA SU. Savills’ market demand forecast report – This report set out the basis of a forward looking market-informed forecast of future need for employment land for strategic I&L uses. This recognises that the market needs of the logistics sector are typically not well reflected in the labour demands forecasts, and that as PPG requires, further market research is required to arrive at a forecast or an assessment of future property market requirements. The Savills overall future need for strategic land for I&L uses is 69 ha, which taking account of the current supply of land, leaves an outstanding need for 59.8 ha. <p>3.3 This robust evidence provides a far higher outstanding need for I&L employment land that must be reflected in the ELT if it to represent a sound part of the DCBLP. Based on this evidence, the ELT is not sound in accordance with the tests in the NPPF (para 35) for the following reasons:</p>

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			<ol style="list-style-type: none"> 1. Not positively prepared – the outstanding minimum employment land requirement (13.73 ha) and the floorspace capacity assigned to Gatwick Green (41,315 sqm) referenced in the ELT do not represent the objectively assessed need for employment land in Crawley. 2. Not justified – the outstanding minimum employment land requirement (13.73 ha) and the floorspace capacity assigned to Gatwick Green (41,315 sqm) referenced in the ELT are not justified by comprehensive or robust evidence as required under PPG. 3. Not consistent with national policy – the outstanding minimum employment land requirement (13.73 ha) and the floorspace capacity assigned to Gatwick Green (41,315 sqm) referenced in the ELT are not in accordance with the NPPF or PPG. <p>Appendix 1: Site Plan</p>  <p>Appendix 2: Development Framework Plan</p> 

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			<p>Suggested Modifications:</p> <p>3.4 Based on the evidence in this representation, GGL considers that whilst the ELT correctly acknowledges Gatwick Green as a Strategic Employment Location for I&L uses, it is not sound insofar as it does not reflect the higher level of future need for I&L land in the evidence noted above, and contains a floorspace provision for Gatwick Green that is not aligned with the nominal potential of the Site. On this basis, the ELT is not sound and to address these issues, the following amendments are required relating to Gatwick Green. These amendments are:</p> <ol style="list-style-type: none"> 1. Amend the first paragraph of the 'Commentary' column relating to Gatwick Green by deleting the words "of a minimum 13.73 ha" and replace with "comprising 44 ha". 2. Amending the first paragraph of the 'Commentary' column relating to Gatwick Green by deleting "a minimum of 41,325 sqm of floorspace" and replacing with "around 77,800 sqm of floorspace". 3. Amend the 'Commentary' column relating to Gatwick Green by deleting the second paragraph of the 'Commentary'. 4. Amend the two tables by replacing "41,315 sqm" with "77,800 sqm" and "13.73 ha" with "44 ha" and add a footnote to these revised figures to state that "The final developable area and floorspace will be a product of the masterplanning process required under Strategic Policy EC4". <p>3.5 The above proposed changes are considered essential for the ELT to be found sound in accordance with the NPPF. The reasoned justification for these changes is set out below (same numbering applies):</p> <ol style="list-style-type: none"> 1. There is no longer any justification for applying a minimum land provision for Gatwick Green given (1) the evidence of a significant level of future I&L employment land of 69 ha, and (2) it is appropriate to identify the size of the Site at 44 ha to reflect its gross site area within which development and all the other land use requirements identified in Strategic Policy EC1 can be accommodated. 2. The floorspace figure of 77,800 sqm of floorspace reflects the nominal capacity of the Site, which has been tested in the Council's traffic model for Crawley, with sensitivity testing on a higher amount of floorspace. The amount of floorspace the Site could accommodate could be higher once further technical work has been undertaken, but 77,800 sqm represents a reasonable minimum that has been tested in transport terms. 3. The deletion of the second paragraph of the 'Commentary' is necessary because the second paragraph is misleading in that it assumes that the minimum development of 13.73 ha reflects that (1) there may be justification for more I&L development above the minimum provided for, (2) there is a need for comprehensive supporting infrastructure, appropriate landscaping and to protect the amenity of neighbouring uses, and (3) there may be scope for supporting uses catering for the needs of employees. This approach is not sound for the reasons stated above and because all these other uses will be identified in accordance with the requirements of Strategic Policy EC4 and so will be deducted from the Site's gross land area of 44 ha.

Employment Land Trajectory			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>4. The basis for the 44 ha to replace 13.73 ha in the two tables is that this is the Site's gross site area to be offset against the outstanding need for 58.3 ha.</p> <p>As a consequence of these proposed changes, there is a need to adjust the Council's Employment Land Availability Assessment (ELAA)³⁹ to reflect the proposed amendments noted above.</p>

³⁹ Employment Land Availability Assessment, Crawley Borough Council, 31 March 2023

Crawley

Local Plan

Housing

Regulation 19 Consultation May-June 2023 Representations
Local Plan Chapters 12 & 13 and Strategic Housing Availability Assessment

Chapter 12. Housing Delivery			
Ref. No.	Respondent	Policy/ Para	Comments
REP/011 (2023)	National Highways	Chapter 12: Housing	<p>NH understand that the development numbers for housing in the Transport Study Report (2022) were derived in 2020. The housing numbers in the submission version of the Plan appear similar. However, NH are unable to confirm that the allocations and windfalls are the same or similar between the current Local Plan and the Transport Study Report. It is unclear whether the amount of consented and non- consented allocations has changed as NH are primarily concerned with the non-consented element of the Plan (allocations and windfalls).</p> <p>Suggested Modifications:</p>
REP/068 (2023)	Sussex Wildlife Trust	Section 12: Housing	<p>Our comments relating to this section still stand. However, we wish to recognise that the page references have changed from 152-154 and are now 158-160.</p> <p>SWT recommends that CBC is strong in setting out the constraints in the district to delivering housing. A ministerial statement in relation to planning was made on 6 December 2021 and in light of this statement, which highlighted potential changes in respect of housing components of strategic plans, SWT asks whether CBC will seek to reconsider the delivery of the housing target?</p> <p>Suggested Modifications:</p>
REP/152	Save West of Ifield	<p>Page 23 – para 2.20 – housing need</p> <p>Page 24 – para 2.29 – housing need</p> <p>Page 156 – paras 12.7 – 8 – housing need</p> <p>Page 14 – para 1.27 – 33 – DTC</p>	<p><i>By 2040, to meet the needs of its growing population, the town would need a further 12,080¹³ 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.</i></p> <p><i>[For the period from 2024 to 2040: 755 dwellings per annum x 16 years, based on the Standard Methodology Figure 2014-based Household Projections, calculated March 2023.]</i></p> <p>SUMMARY COMMENT:</p> <ol style="list-style-type: none"> 1. The Standard Method is deeply flawed and should not be used to calculate housing need. Instead a bottom-up approach should be used using ONS data on the components of population change for each LPA, plus consideration of other elements of need such as housing lists. The affordability adjustment has no basis in theory – neither is there any practical evidence for its validity – and it should be dropped. 2. A bottom-up approach suggests a need for Crawley of 6-700 houses a year. 3. Updating the Standard Method calculation with 2018-based ONS projections suggests an OAN of 360 a year, ie significantly below the bottom-up estimate. 4. Since a flow of households from Crawley to Horsham is already embedded in the ONS's data, and since Horsham is massively (unsustainably) over-building in any case, there is no case for DTC building in Horsham.

Chapter 12. Housing Delivery

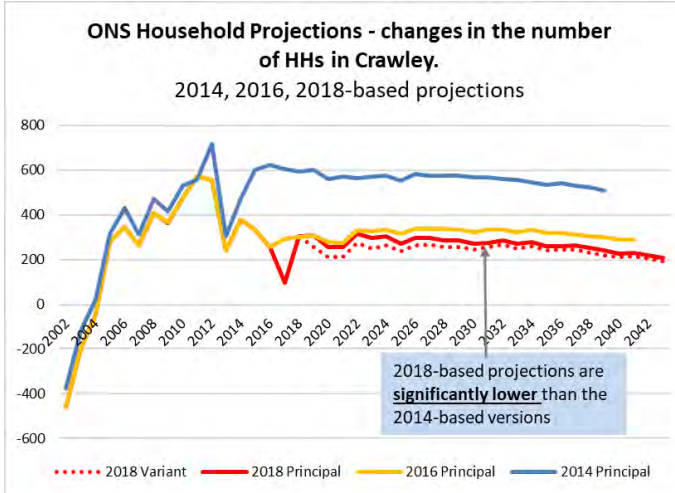
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Page 164 – para 12.39 – DTC

DETAIL:
 The **OAN Using the Standard Method**, the Plan and [Housing Needs Topic Paper](#) identify a need (OAN) for around 750 dwellings per year, or 12,000 dwellings over the proposed Plan period. Step 1 uses ONS’s 2014-based HHPs to give 570hhpa, and step 2 increases this by 180hhpa (32%) due to the Affordability Adjustment. These figures are shown in the table below.

Chart 1: Evolution of ONS population projections - Crawley

Chart 1 shows that the ONS population projections for Crawley have been revised down in subsequent datasets, ie the 2014-based projections were too high. This is the case for the vast majority of districts in the UK, but not Horsham. The 2018-based projections (red line) are around 300hhpa lower than the 2014-base projections.



The ONS’s 2021 Census results for Crawley are very close to the 2018-based projections for 2021, which lends credibility to these compared to the 2014-based projections currently used for the Standard Method.

So, using the 2018-based projections in the Standard Method would give a new target of 363 new houses a year (assuming unchanged affordability adjustment) as opposed to the current target of 750, ie 413 fewer new houses a year.

The current target and this possible new target are indicated in Table 1:

Table 1: Evolution of CBC’s House-building Targets, with Possible Future Target

	SHMA 2019	Draft Local Plan 2021	ONS 2018-based HHPs	2021 Census
ONS demographic projection	570	570	277	286
Uplift for affordability	182 (32% 2018)	180 (32% 2019)	86 (31% 2021)	89 (31% 2021)
TOTAL	752	750	363	375
Contribution from neighbouring LAs for unmet need	??	??		
TARGET				
	2019-2029	2019-2039	2019-2029	2021-2031

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			<p>Taking a bottom-up approach based on the ONS's published components of population change shows that in recent years Crawley's births have exceeded deaths to the tune of around 300 households¹ a year. See Chart 2. International migration had been around 200 households a year, and was falling pre-pandemic but could be higher again now due to asylum seekers. So the need from these sources might be 4-500 houses a year. Crawley's housing list is around 2,000 households, and social housing is needed to bring it down. It's not straightforward to assess how many of the 2,000 might already be accounted for in the ONS's data (growing families and international migrants needing social housing), but a significant number will be 'hidden households', ie people and families living with relatives, but needing their own accommodation. So their needs should also be added in. So a bottom-up approach might suggest Crawley has an overall <u>minimum</u> need of around 6-700 new houses of which at least 400 should be social housing.</p> <p>But how does this reconcile with the OAN of around 360 which would be the result of updating the Standard Method calculation using ONS's 2018-based projections?</p> <p>The increases in population tend to be partly offset by negative net internal migration, ie people moving outside the Crawley boundary (the early years of the financial crisis were an exception). The net outflow from Crawley has been around 400 households on average over the past five years, and this has fed into the ONS's 2018-based projections, ie it is assumed this rate of outflow will continue, lowering overall population increase. The 2014-based projections will have used an outflow of around 100 a year, resulting in higher estimates of population growth.</p> <p>Why have net outflows of people increased? This is quite possibly due to the increased availability of new housing as new developments are built out in Crawley and by neighbouring LPAs. Completion rates took off post the financial crisis when the Bank of England and Treasury introduced various stimuli which boosted demand and building, including Help to Buy in 2012. For example, by 2016 Horsham was averaging 1,000 completions a year compared to the average of 500 pre-crisis.</p> <p>So, ONS data show that in 2019 the net migration from Crawley to Horsham was around 250 households. And Horsham's population is increasing at a rapid (unsustainable) rate driven by house-building – 75% of the increase in dwelling stock corresponds to the net migration into the district, ie 660 households a year (we can't say these households are occupying the new houses, but we can see the relationship between the growth in both houses and households). See orange bars and red line in Chart 3.</p>

¹ Of course current births or deaths do not necessarily lead to immediate changes in household numbers. But the ONS, and by extension DLUCh, assumes as much.

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			<p>The really important thing is that this increased flow from Crawley to Horsham is now in the ONS's population data, since 2016, and will have influenced the 2018-based projections, and will do the same for future sets of projections. Hence Crawley's lower projected figure of 277 in the table above, and Horsham's correspondingly higher figures.</p> <p>This means that the flow from Crawley to Horsham (of around 250) is assumed to continue and is already 'baked in' to the projections and the OAN calculations. This can be viewed as <u>a DTC of 200 a year having become embedded in the local population and housing dynamics.</u></p> <p>Crucially, if both LPAs calculate their housing needs using the Standard Method And since Crawley can meet a need of 360 houses a year, there is no need for Horsham to provide any housing via a DTC arrangement, unless both</p> <table border="1"> <thead> <tr> <th></th> <th>OAN using 2014-based projections</th> <th>OAN using 2018-based projections</th> <th>Bottom-up approach</th> </tr> </thead> <tbody> <tr> <td>Crawley</td> <td>750</td> <td>360</td> <td>700</td> </tr> <tr> <td>Horsham</td> <td>950</td> <td>1,200</td> <td>600</td> </tr> <tr> <td>TOTAL</td> <td>1,700</td> <td>1,560</td> <td>1,300</td> </tr> <tr> <td>DTC</td> <td>Not needed – Horsham's OAN already hugely over-stated – will deliver excess housing in any case.</td> <td>Not needed – already embedded into ONS projections, and so in Horsham's OAN.</td> <td>Needed, unless Crawley can find alternative way to increase delivery</td> </tr> </tbody> </table>		OAN using 2014-based projections	OAN using 2018-based projections	Bottom-up approach	Crawley	750	360	700	Horsham	950	1,200	600	TOTAL	1,700	1,560	1,300	DTC	Not needed – Horsham's OAN already hugely over-stated – will deliver excess housing in any case.	Not needed – already embedded into ONS projections, and so in Horsham's OAN.	Needed , unless Crawley can find alternative way to increase delivery
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Chart 2: Components of Crawley’s population (households) change since 2001.
 Bright blue bars show births exceed deaths by around 300 a year. Grey bars show international migration (net). Orange bars show net migration out of Crawley into other parts of the UK. And the red line is housing delivery.

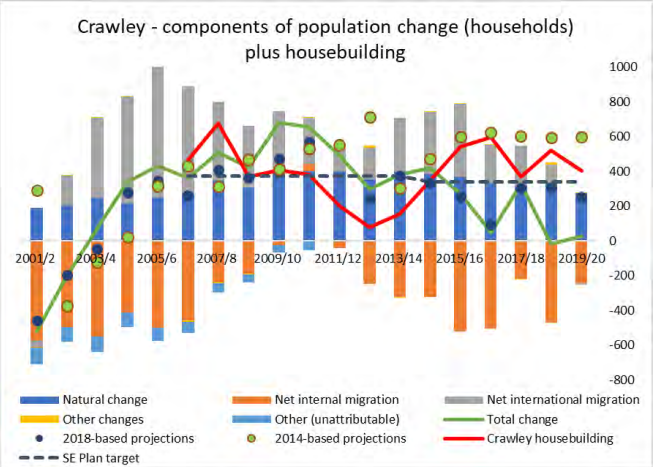
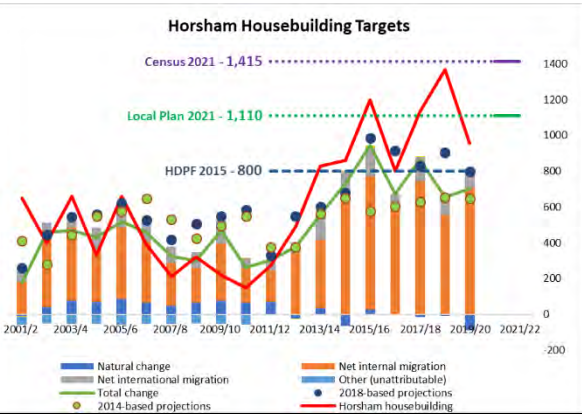


Chart 3: Components of Horsham’s population (households) change since 2001.
 Dominated by the orange bars, ie population growth almost entirely driven by net migration into Horsham from other parts of the UK –



mainly Crawley, Surrey and south London.
 Also note housing delivery averaging 1,000 a year since 2014, in excess of current target of 800.

Suggested Modifications:

REP/152	Save West of Ifield	Page 155 – Para 12.1- Chapter 12 Housing Delivery	<p><i>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. ... Crawley’s population was expected to grow by over 16% over the period 2019-2039 to reach 135,262 residents.</i></p> <p>Crawley’s population grew by 11.2% in the 10 years between the 2011 and 2021 ONS censuses, the second highest of any local authority (LA) in Sussex or Surrey – only Horsham grew more quickly – and almost double the rate for England and Wales overall of 6.3%. Crawley’s growth is also higher than all but four LAs in Kent with the exception of Dartford, Maidstone, Ashford and Swale. See Table 1 for list of all LAs.</p>
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LA name	Usual resident population, 2011	Usual resident population, 2021	Percentage change
Dartford	97,365	116,800	20.0
Maidstone	155,143	175,800	13.3
Ashford	117,956	132,700	12.5
Horsham	131,301	146,800	11.8
Swale	135,835	151,700	11.7
Crawley	106,597	118,500	11.2
Arun	149,518	164,800	10.2
Reigate and Banstead	137,835	150,900	9.5
Tonbridge and Malling	120,805	132,200	9.4
Runnymede	80,510	88,100	9.4
Chichester	113,794	124,100	9.1
Mid Sussex	139,860	152,600	9.1
Epsom and Ewell	75,102	80,900	7.7
Spelthorne	95,598	103,000	7.7
Wealden	148,915	160,100	7.5
Worthing	104,640	111,400	6.5
Elmbridge	130,875	138,800	6.1
Tandridge	82,998	87,900	5.9
Waverley	121,572	128,200	5.5
Adur	61,182	64,500	5.4
Gravesham	101,720	106,900	5.1
Surrey Heath	86,144	90,500	5.1
Sevenoaks	114,893	120,500	4.9
Thanet	134,186	140,600	4.8
Guildford	137,183	143,600	4.7
Woking	99,198	103,900	4.7
Dover	111,674	116,400	4.2
Canterbury	151,145	157,400	4.1
Rother	90,588	93,100	2.8
Lewes	97,502	99,900	2.5
Mole Valley	85,375	87,400	2.4
Eastbourne	99,412	101,700	2.3
Folkestone and Hythe	107,969	109,800	1.7
Brighton and Hove	273,369	277,200	1.4
Hastings	90,254	91,100	0.9
Tunbridge Wells	115,049	115,300	0.2

Source: Office for National Statistics – Census 2021

How can this rate of growth be sustainable given the shortage of water in the south-east region, the inability of water companies to treat sewage safely, and the failure of developers and LAs to deliver the necessary infrastructure? And how does this rate of growth fit with the Council's 30-year vision?

Table 1: Population change between 2011 and 2021, local authorities in Sussex, Surrey and Kent

Suggested Modifications:

REP/033 (2023)	Horsham District Council	Urban Extensions "At Crawley" 12.20-12.23	<p>Urban Extensions: 'At Crawley'</p> <p>Whilst HDC is considering development to the west of Ifield through its Local Plan review, we wish to make clear that at this stage no formal decision has been made on the proposed allocation of the land in its Local Plan. Following the recent elections, HDC will be reviewing all development proposals which have been submitted to ensure that the local plan reflects the aspirations of the new administration.</p> <p>We recognise that CBC will take a strong interest in potential development on or near its boundary as development in such areas may have cross-boundary impacts. Because of this, and building upon our strong history of successful joint working, we have been in constant discussions on a range of matters to understand Crawley's needs and viewpoints when considering these proposals to date, and very much</p>
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			<p>welcome and support this process. This will be set out in updated statements of common ground which are in the process of being finalised. Further, CBC has also been part of ongoing discussions as part of the Planning Performance Agreement with Homes England in relation to development proposals to the west of Ifield that are being considered as part of the Horsham District Local Plan Review.</p> <p>We have commented on previous versions of this section of the plan and our position remains the same. Paragraphs 12.17 to 12.23 collectively set out a very detailed narrative on landscape character within the setting of Crawley. This section replaces draft Policy H3g that was included in a previous Regulation 19 version of the Plan and includes a 'shadow' policy framework that seeks to influence land use on areas outside CBC's administrative area. Given such land lies outside of the administrative area of CBC, the paragraphs and 'shadow' policy are ineffective. It is for the Horsham District Local Plan to set the policy parameters in such areas. We continue to consider that this whole suite of paragraphs is not effective and we firmly request that our previously made comments are fully taken into account and these references be removed. Furthermore, our view is that the retention of such wording would cause confusion should there be any conflict with any wording that is set out in the emerging Horsham District Local Plan in due course. We consider a continuation of this collaborative working is the most effective place-shaping mechanism.</p> <p>We are particularly concerned with regards to references in paragraph 12.20 and in sub-clause vii of the 'shadow' policy within 12.23. This is as they collectively assert that development on land located near, but ultimately outside of Crawley's administrative area, should help address Crawley's unmet housing needs – including on matters relating to affordable housing, housing mix, type and tenure. As already outlined, whilst HDC supports working towards a joint approach on such matters, this principle of meeting CBCs unmet needs has not been agreed with HDC, and insofar as it relates to development within Horsham District, the proposed plan wording would be ineffective. As is expected to be set out in the Northern West Sussex Housing Market Area Statement of Common Ground, development identified in Local Plans will firstly meet needs in their respective administrative areas.</p> <p>Further to the above, the paragraphs do not reflect the current context for plan-making within Horsham in light of the impact on future housing delivery of water neutrality. Though the housing requirement in the existing Horsham District Planning Framework (adopted 2015) was increased by 150 homes per year to help address unmet need in Crawley, CBC has been made aware that HDC is highly unlikely to be in a position to meet its own housing needs going forward, let alone meet the needs of other authorities. This is mainly due to issues relating to the ongoing need to ensure water neutrality in new development. Reference should be made in this respect to our recent letter to you dated 19 April 2023. Given this, CBC should not expect that HDC will be able to contribute to meeting unmet needs in the short to medium term.</p> <p>Suggested Modifications:</p>

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Ref. No.	Respondent	Policy/ Para	Comments
REP/050 (2023)	Homes England	Housing Delivery Para 12.23	<p>Paragraph 12.23: 'At Crawley' Urban Extensions Key Considerations</p> <p>Given that it is not possible to set policy for development outside the authority's administrative boundary, addressing urban extensions through supporting text is appropriate.</p> <p>Homes England recognise the purpose of this text is to allow Crawley Borough Council to articulate the expectations of the council should development come forward in areas adjoining its administrative boundary. This is particularly important given the ongoing commitment within Policy H1 for Crawley Borough Council to work closely with its neighbouring authorities and consider the unmet needs of Crawley over the Plan period and potentially beyond.</p> <p>However, as currently worded the supporting text is unsound as they are neither justified nor effective. Given the significant undersupply of housing land over the Plan period and the substantial reliance on adjacent urban extensions to meet unmet housing needs and other development needs, the Plan should be proactive in supporting the delivery of urban extensions adjacent to the boundary, working with neighbouring authorities rather than seeking to resist them in the event that a detailed list of fixed criteria cannot be met.</p> <p>To be sound, the list should be presented as desired outcomes and ways in which the authority will work collaboratively with neighbouring authorities to meet the unmet needs rather than a series of 'tests' that necessitate or require that certain conditions 'must' be met in order for the council to support them, without the necessary evidence being available and proposals being fully tested at this time.</p> <p>Whilst recognising its reduced weight, comments are made on the following 'considerations' or criteria, which are considered to be unsound as currently drafted:</p> <p><i>12.23 ii. If development is proposed to the western side of Crawley, the scoping, design and delivery of the comprehensive Western Multi-Modal Transport Link (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 Council.</i></p> <p>Homes England supports the delivery of the Western Multi-Modal Transport Link. However, the proposed requirement and expectation for the full link road to be delivered prior to completion of any properties is unsound as it is not justified against the Council's evidence base, contrary to paragraph 35 of the NPPF.</p> <p>The Crawley Transport Study June 2022 assesses three scenarios of growth on the strategic highway network. Scenario 3 assesses the cumulative impact of 6,730 new homes within Crawley Borough, an employment allocation at Gatwick Green to meet the identified employment needs of the area, an assumed increase in retail provision, and additional housing and employment promoted by Horsham to the west of</p>

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			<p>Crawley, specifically including Land West of Ifield (3,750 homes) and West of Kilnwood Vale (c. 1,500 homes).</p> <p>It is relevant to note here that the number of homes assessed within the Transport Study appear to exceed that proposed within the Draft Crawley Local Plan, which seeks to plan for 5,030 dwellings across the plan period. In addition, the Land West of Ifield is currently being promoted for c. 3,000 homes. As such, the assessment undertaken represents a worst-case scenario.</p> <p>To mitigate the impacts of additional growth on the highway network, the Crawley Transport Study first considers the impact of increasing investment in sustainable transport measures. The interventions identified align with the <i>Crawley Transport Strategy, New Directions for Crawley – Transport and access for the 21st century (March 2020)</i>, which emphasises encouraging the use of public transport, cycling and walking in preference to increasing highway capacity. Similarly, car trip reductions have been applied to the Land West of Ifield and West of Kilnwood Vale developments to account for high-quality bus, walking and cycling infrastructure to be provided.</p> <p>In the model for Scenario 3 that excludes the Western Multi-Modal Transport Link but includes the above sustainable transport measures, the modelling confirms (paragraph 11.5.3) that the level of growth to 2037 can be accommodated on the highway network, with physical mitigation required at just one location: the Ifield Roundabout/Ifield Avenue/A23 Crawley Avenue junction. A local widening scheme of this junction has been identified which would mitigate the impacts of forecast growth. It is noteworthy that this mitigation is required regardless of whether the Land West of Ifield or West of Kilnwood Vale development comes forward, as it was also required for the lower growth projection assessed under Scenario 2.</p> <p>Whilst the modelling confirms that Scenario 3 growth projections can be accommodated without the need for the Western Multi-Modal Transport Link, the implications of providing a 30-mph link from the A264 to the A23 London Road with a single traffic lane and single bus lane in each direction has been tested as a sensitivity. As per paragraph 9.5.1 of the Transport Study, the results suggest that the main beneficiaries of the Western Multi-Modal Transport Link are the western minor roads, predominantly Faygate Lane and Rusper Road, with lesser flow changes within the Crawley urban network and on the M23.</p> <p>Overall, the Council's evidence therefore confirms that the full Western Multi-Modal Transport Link is not required prior to the completion of any homes to the West of Crawley, as currently sought in paragraph 12.23.</p> <p>Nevertheless, it is recognised that the study mentions at paragraph 9.5.5:</p>

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			<p><i>“There is potential for more future development west of Crawley beyond the levels of development that have been assumed in Scenario 3 of this study. This would likely have greater impact on the network and hence the need for a CWLR to relieve these impacts may become more evident.”</i></p> <p>In this regard, Homes England continues to consider that the scoping of the Western Multi-Modal Transport Link is critical to unlocking further major strategic development to the West of Crawley beyond the Draft Crawley Local Plan period and the Land West of Ifield site. Therefore, Homes England considers there to be reasonable justification for paragraph 12.23ii) to include the expectation for the Western Multi-Modal Transport Link to be safeguarded.</p> <p>However, it is important to ensure that the supporting text is neither overly prescriptive nor sets expectations as to the need for, or delivery programme for the Western Multi-Modal Transport Link.</p> <p>The second criterion which requires amendment in paragraph 12.23 is criterion vii as below: <i>12.23 vii. The development helps to address unmet development needs arising from Crawley, including in relation to housing mix, type, tenure and affordability (including 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.</i></p> <p>Whilst Homes England recognises the important role that sustainable urban extensions could play in meeting Crawley’s unmet housing needs, Homes England is concerned about the level of prescription and detail within the Plan before being fully tested by the relevant plan making authority alongside other policy requirements.</p> <p>Homes England is fully committed to ensure more homes are built in areas of greatest need and to improve affordability. However, the Draft Crawley Local Plan cannot lawfully set the policy requirements in relation to affordable housing on land outside of the council’s administrative area, nor can it require that any affordable housing in an urban extension include agreements for nomination rights to go to those on the Crawley housing register. In setting the expectation in the Draft Crawley Local Plan, this could lead to confusion for applicants, developers and importantly the community about the remit of the Plan and the policy position for future discussions under any planning application.</p> <p>This will be a matter for neighbouring authorities to consider in the preparation of their Local Plans, albeit clearly involving close collaboration and working with Crawley Borough Council. The provision of affordable housing forms a key topic for the Duty to Cooperate Statement, and any agreed or ongoing discussions about how Crawley Borough Council and neighbouring authorities would agree and nominate affordable housing would be appropriately contained within the respective Statements of Common Ground. This</p>

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			<p>demonstrates the importance of preparing an up-to-date Statement of Common Ground with Horsham District Council, as referenced above.</p> <p>Secondly, policy cannot be set in the absence of fully testing the implications on overall viability for any proposals emerging in the Horsham Local Plan. In accordance with the paragraph 57 of the NPPF, site allocation policies should set out the contributions (including affordable housing) based on viability testing as part of plan led process. Therefore, the inclusion of a requirement, even within supporting text, for 40% affordable housing on land outside Crawley Borough Council area is not legally compliant, consistent with the NPPF, nor justified and therefore is not sound. Any affordable housing requirements will need to be justified on the basis of the evidence around housing need as well as viability assessment as part of the relevant Plan led process.</p> <p>In order for paragraph 12.23vii) to be sound, it is requested that criterion vii) is amended so that it removes any specific targets.</p> <p>Suggested Modifications:</p> <p>Given the majority of this Link Road falls outside Crawley Borough Council administrative area, will be subject to more detailed technical assessments as part of the planning process including opportunities for more sustainable transport connections, and could come forward over the lifetime of the Plan and beyond, the wording of paragraph 12.23 should be flexible. The presumption within the supporting text about the trigger points for delivery of the Western Multi-Modal Transport Link is not justified nor supported by the transport modelling published to date and therefore is not sound. It should be deleted.</p> <p>Furthermore, whilst a collaborative approach to preparing any Western Multi-Modal Transport Link is supported by Homes England, it is not justified for the supporting text to specify that permission for a western urban extension should be conditional on all three parties (Horsham District Council, Crawley Borough Council and West Sussex County Council) approval. It is the responsibility of the determining planning authority for any planning application to take consideration of statutory consultee and neighbouring authority representations (alongside other representations made) to determine a proposal on its merits. The agreed approach for any discussions on cross-boundary matters are, again, best placed within a Statement of Common Ground with Horsham District Council and West Sussex County Council which will allow flexibility across the plan period and for the matter to be dealt with at the time of any future application.</p> <p>In order for the wording to be sound, it is recommended that paragraph 12.23ii) is amended to recognise flexibility in relation to the form and delivery of the Western Multi-Modal Transport Link, to allow for a scheme that is based on design development, proportionate need and evidence:</p>

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			<p><i>If development is proposed to the western side of Crawley, the scoping, design and delivery of the comprehensive Western Multi-modal Transport Link (connecting from the A264 to the A23, north of County Oak, Policy ST4) should be informed by transport evidence and support wider objectives, including enabling high quality sustainable transport opportunities for both existing and new communities. The appropriate phasing of any link, in part or full, will be informed by a transport assessment, 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 Council.</i></p> <p>Indeed, this approach is supported within the supporting text to Policy ST4, which at paragraph 17.23 states “<i>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.</i>”</p> <p>Finally, references throughout the Draft Crawley Local Plan to the delivery of the Western Multi-Modal Transport Link and any impacts of wider junction improvements should be amended to be justified and allow for detailed technical considerations to occur at planning application stage, particularly given the potential for more sustainable modes of travel and changing travel patterns across the plan period. This is notably requested at paragraph 17.24.</p> <p>In order for paragraph 12.23vii) to be sound, it is requested that criterion vii) is amended so that it removes any specific targets.</p> <p>The third criterion which requires amendment in paragraph 12.23 is criterion xi: <i>12.23 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;</i></p> <p>Additional wording should be included to ensure consistency with national policy. The criterion should be updated to be clear that development that results in the loss of ancient woodland / veteran trees should be refused “unless there are wholly exceptional reasons and a suitable compensation strategy exists” in line with NPPF Para 180 (c).</p> <p>The fourth criterion which requires amendment in paragraph 12.23 is criterion xiii: <i>12.23 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;</i></p>

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			<p>The requirement on urban extensions to demonstrate exemplar standards is not justified in as much as 'exemplar' is not defined and has not been tested alongside other policy requirements as part of the relevant Local Plan evidence base. The following wording is suggested, retaining the sentiment and purpose of the criteria but providing greater flexibility for requirements to be tested as part of the relevant plan making process.</p> <p><i>As a minimum, development must be designed to meet prescribed national exemplar sustainability standards, exploring opportunities to exceed these wherever possible, 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.</i></p> <p>The final criterion that requires amendment in paragraph 12.23 is criterion xiv: 12.23 xiv. <i>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.</i></p> <p>Homes England supports the ambition that development proposals adjacent to Crawley should promote high quality design and identify, understand and fit with the character, form and layout of the site's surroundings which, as per the NPPF, National Design Guide and National Design Code, is important to achieve high quality places.</p> <p>However, paragraph 73 of the NPPF is clear that it is for the <i>strategic policy-making authorities</i> to identify suitable locations for larger developments, and that they should <i>set clear expectations for the quality of place and for use of appropriate tools such as masterplans and design guides/codes.</i></p> <p>In the case of developments outside of Crawley Borough Council administrative area, it would be for those neighbouring authorities to set the policy direction and tools to be used in guiding the quality of the place. Homes England are supportive of ongoing discussions with Crawley Borough Council and Horsham District Council through pre-application and under the Duty to Cooperate, but it is not within the remit of the Draft Crawley Local Plan to identify the tools, or type of tools, which should be used for developments outside its boundaries.</p> <p>Furthermore, Homes England considers the wording of criterion xiv) to 'use bespoke Area Wide Design Assessment tools' is unsound because it does not provide a 'clear expectation' of the appropriate tools to be used and is ambiguous to the extent it would be challenging for any determining authority to understand what is required. Therefore, it is inconsistent with the requirements of paragraph 16d and 73 of the NPPF.</p>

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			<p>For this reason, in order for this criterion to be sound it is requested that criterion xiv) is amended so that it removes the requirement to use ‘bespoke Area Wide Design Assessment tools’.</p> <p>Lastly, in line with the recommended amendments to the criteria under paragraph 12.23, the preceding supporting paragraphs 12.17-12.22 should also be updated, particularly in relation to the remit of the Crawley Local Plan, and to recognise the positive and proactive opportunity for urban extensions to Crawley, such as at the Land West of Ifield.</p> <p>In particular, given any allocation policy for an urban extension adjacent to Crawley would be subject to a detailed allocation policy, ongoing discussions with Crawley Borough Council and a thorough examination as part of the neighbouring authority’s Local Plan, the proposal of a Joint Area Action Plan in paragraph 12.22 is not considered necessary. The preparation of such a Plan could instead add significant delay to the delivery of much needed homes. As such, the wording to paragraph 12.22 should be updated to remove reference to the Joint Area Action Plan as it is unnecessary, and the preparation of any such documents should be considered separately between any relevant applicants and authorities.</p>
REP/066 (2023)	Mid Sussex District Council	Urban Extensions: “At Crawley) Para 12.17 – 12.23	<p>Urban Extensions: ‘At Crawley’ (Paragraph 12.17 – 12.23) Response from June 2021 continues to apply.</p> <p>Suggested Modifications:</p>
REP/119 (2023)	Turley on behalf of A2 Dominion	12.18	<p>Urban Extensions: ‘At Crawley’ Paragraph 12.18</p> <p>We welcome the recognition that sustainable new neighbourhoods could play an important role in meeting Crawley’s housing needs. We also welcome the recognition 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. As with our earlier comments, the Local Plan should not be used as a tool to support/discourage specific locations for that growth as all such opportunities should be considered.</p> <p>Suggested Modifications:</p>
REP/152	Save West of Ifield Campaign	12.21	<p>Urban extensions at Crawley will require the implementation of a Western Link road as outlined in the Local Plan. However, the line of the route is not clear and in practice it is likely that it would take many years to resolve this especially when the routing conflicts with Willoughby Fields LNR and potentially the Gatwick safeguarding area. The net of this would be that it would not prove possible in practice to deliver this new link in advance of any development(s) West of Ifield. This either delays the implementation of this site or, more likely, results in the additional traffic being routed along the existing and already heavily congested roads including Overdene Drive, Rusper Road and Ifield Avenue. There would also be a general increase</p>

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			<p>in traffic 'rat-running' through adjacent neighbourhoods like Gossops Green and Langley Green. In these circumstances what is the likelihood of the Western Link Road ever materialising?</p> <p>The Save West of Ifield campaign are of the opinion that any Western Link Road should be fully designed and delivered ahead of any 'at Crawley' developments. Previous experience, i.e. Kilnwood Vale, suggests that this is unlikely and that the resulting additional congestion, noise and pollution will occur.</p> <p>These issues are clearly laid out in 'At Crawley' Urban Extensions Key Considerations para 12.23. But there are no guarantees that this will happen as articulated in this policy.</p> <p>Suggested Modifications:</p>																				
REP/119 (2023)	Turley on behalf of A2 Dominion		<p>Paragraph 12.23</p> <p>We welcome the fact that Crawley Borough Council has provided guidance as to the circumstances where it will support housing development through urban extensions on or close to its administrative borough boundaries.</p> <p>The following table sets out A2Dominion's explanation as to how the proposal at Cottesmore Village could achieve those expectations:</p> <table border="1"> <thead> <tr> <th>Criterion</th> <th>Reponse</th> <th></th> <th>and sustainable transport modes.</th> </tr> </thead> <tbody> <tr> <td>i. 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A2Dominion would work with stakeholders to develop a scheme of high quality urban design.</td> </tr> <tr> <td>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.</td> <td>This is not relevant as Cottesmore Village is south of Crawley</td> <td>v. Developments are designed and progressed as comprehensive neighbourhoods rather than incremental ad hoc development.</td> <td>Cottesmore Village offers the opportunity to design a new neighbourhood in a comprehensive manner.</td> </tr> <tr> <td>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.</td> <td>Cottesmore Village has been informed by a detailed analysis of the landscape character design and masterplanning work can demonstrate this. It is anticipated that it would utilise and enhance public transport</td> <td>vi. Neighbourhood centres containing local facilities and services are provided in order to meet the day-to-day needs of residents.</td> <td>Cottesmore Village is envisaged as a new community including a local centre to meet day-to-day needs.</td> </tr> <tr> <td></td> <td></td> <td>vii. 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			<p>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.</p> <p>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</p> <p>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.</p> <p>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.</p> <p>SUMMARY A2Dominion consider that addressing the housing and economic needs of Crawley Borough is critical. These needs cannot be addressed within Crawley itself and for various reasons, the opportunities to address them elsewhere are limited, especially to the north of the town. Addressing these needs is critical to the availability of new housing, and new affordable housing in particular, and opportunities to so, close to where the need arises should be taken. Not meeting these needs, or providing for them away from Crawley is likely to harm the access to affordable housing to employment opportunities and provide a missed opportunity to support and enhance Crawley's local economic role.</p>
			<p>Cottesmore Village is located close to the existing communities within Crawley and connections between these neighbourhoods can be achieved, including via public transport.</p> <p>Cottesmore Village has been informed by a detailed analysis of the landscape character and further design and masterplanning work can be presented to illustrate how development can be accommodated in a high quality landscaped setting. A2Dominion would work with stakeholders to develop a scheme of high quality urban design which is informed by the detailed understanding of landscape and heritage considerations for example.</p> <p>If Cottesmore Village is to be taken forward then A2Dominion would commit to working with relevant stakeholders through the masterplanning and detailed design stages so that these considerations are taken into account throughout the process.</p> <p>If Cottesmore Village is to be taken forward then A2Dominion would commit to working with relevant stakeholders through the masterplanning and detailed design stages so that the scheme is informed by a detailed analysis and understanding of the wider area and its character.</p>
			<p>is enhanced.</p> <p>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.</p> <p>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.</p> <p>xii. Development must incorporate strategic Green Infrastructure throughout, providing ecological linkages, in particular to support pollination, and result in a Net Gain to biodiversity.</p>
			<p>Cottesmore Village will not lead to the merging (actual or perceived) of settlements. It is located close to the existing communities within Crawley and connections with be achieved to these neighbourhoods. The landscape structure around the site offers the potential to accommodate the new community within defensible boundaries.</p> <p>The initial proposals for Cottesmore Village have been prepared based on assessments of the site and area, including in relation to arboricultural matters. A2Dominion's further masterplanning will develop these elements of the proposal as part of a holistic scheme.</p> <p>The initial proposals for Cottesmore Village have been prepared based on assessments of the site and area, including in relation to ecology and landscape matters. A2Dominion's further masterplanning will develop these elements of the proposal in order to achieve biodiversity net gain.</p>

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			<p>A2Dominion therefore support the early recognition by CBC of the imperative that its unmet needs are addressed. Proactive and coordinated dialogue will be required with a number of stakeholders in order to ensure that this objective is achieved.</p> <p>Suggested Modifications:</p>
REP/152	Save West of Ifield Campaign	12.23	<p>Current wording 12.23 Housing development through urban extensions on or close to Crawley’s administrative boundaries will be supported by Crawley Borough Council where it can be shown: ...</p> <p>Suggested Modifications: SWOI comment: This statement should be amended to read: “Housing development through urban extensions on or close to Crawley’s administrative boundaries will only be supported by Crawley Borough Council where it can be shown: ...”</p>
REP/021 (2023)	Gladman Developments	H1	<p>1 INTRODUCTION</p> <p>Context</p> <p>1.1.1 Gladman welcome the opportunity to comment on the Crawley Borough Council (CBC) Local Plan Submission Publication consultation and request to be updated on future consultations and the progress of the Local Plan.</p> <p>1.1.2 Gladman Developments Ltd specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public.</p> <p>1.1.3 At present, Gladman have significant concerns regarding the proposed Crawley Borough Council Local Plan and it’s ability to deliver the full residential and employment needs for the borough. It is considered that the Regulation 19 consultation is premature given that there are existing significant uncertainties existing in relation to water neutrality and proposed offsetting scheme with the required evidential justifications not yet finalised. The current iteration of the Local Plan cannot be considered to be positively prepared, effective or justified.</p> <p>Plan Making</p> <p>The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is: Positively Prepared – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</p>

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			<p>Justified – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base;</p> <p>Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and</p> <p>Consistent with National Policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</p> <p>2 LEGAL COMPLIANCE Duty to Cooperate</p> <p>The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.</p> <p>The revised Framework introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist.</p> <p>Planning guidance sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process¹. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.</p> <p>The latest SOCG between the Northern West Sussex (NWS) authorities within the Local Plan evidence base was published in 2020 and outlined that the NWS authorities would continue to work together to address future housing needs of the Housing Market Area (HMA) alongside exploring potential opportunities and mechanisms to meet housing needs of different groups.</p> <p>However, since the publication of the SOCG in May 2020, the societal and planning policy context across the NWS HMA, and wider country has significantly changed. Particularly in relation to water neutrality requirements across Southern Water’s Sussex North Water Resource Zone.</p>

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			<p>In addition, in response to a Duty to Cooperate letter sent by CBC to neighbouring authorities in April 2023 in relation to unmet housing needs, no authority offered to assist the Council in addressing these unmet housing needs. Indeed, Horsham District Council (HDC) confirmed that despite previously including an allowance for unmet needs arising from Crawley within the draft Regulation Plan (2021), which did not undergo public consultation due to national planning policy and water neutrality issues, given these circumstances HDC cannot commit to meet any part of the overall unmet housing needs of Crawley.</p> <p>In light of the aforementioned circumstances and guidance in the PPG which states that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process, the Council should have published an updated SOCG outlining the issues and latest circumstances affecting cross-boundary strategic planning issues².</p> <p>Furthermore, the implications of the above have significant consequences on delivering the identified housing needs of the area and Gladman consider that additional work, such as SHLAAs, must be jointly undertaken by the authorities to justify their position and ensure that needs are met in full as required by national planning guidance³. This be explored in further detail through section 3 of this representation.</p> <p>REGULATION 19 (3) CONSULTATION Background</p> <p>The ongoing consultation represents the third Regulation 19 consultation undertaken on the emerging Local Plan. The current iteration provides significant amendments including a revised plan period, updated housing requirement following the latest affordability ratios in which the Council seek to meet just 42% of their Local Housing Need within the borough and significant policy additions in relation to water neutrality.</p> <p>Gladman have responded to each previous consultation and previously were supportive of the Council's engagement with neighbouring authorities to address unmet housing needs arising from the borough. However, the circumstances have drastically changed and it is considered that the current draft Plan is not effective, positively prepared or justified.</p> <p>The sections that follow below include specific comments from Gladman on the Regulation 19 consultation.</p> <p>Housing Delivery</p> <p>Gladman have significant concerns regarding the Local Plan's effectiveness in seeking to deliver the Borough's identified housing needs between 2024-2040 and consider that the current approach is not effective, positively prepared or justified.</p> <p>Firstly, beyond updating the housing requirement to account for the latest Local Housing Need (LHN) figure there has been no comprehensive update to the Strategic Housing Market Assessment (SHMA) and housing need assessment since 2019.</p>

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			<p>The 2019 SHMA concluded that population growth over the plan period would be unlikely to create additional housing needs above the LHN figure, however this assessment was based upon a period of 2019-2039 on assumptions that pre-dated the COVID-19 pandemic, cost of living crisis and national planning policy implications.</p> <p>Furthermore, the affordability issues across the country and within the borough have continued to rise with the affordability ratio (ratio of median house price to median gross annual workplace-based earnings) in Crawley increasing from 9.05 in 2019 to 9.27 in 2022.</p> <p>It is evident that the SHMA is not an accurate reflection of Crawley today and the strategic issues facing the borough between 2024-2040 and therefore, the proposed housing need and requirement cannot be considered to be an effective or positively prepared number.</p> <p>Secondly, Gladman acknowledge that Crawley is subject to a tightly drawn administrative boundary alongside flood risk and other constraints which will affect the Council's ability to meet identified development needs within the borough's boundary. In this regard, it is accepted that the proposed housing requirement within Strategic Policy H1 is a supply-led figure.</p> <p>Notwithstanding this, the supply-led requirement figure to be delivered within the borough's boundary amounts to just 42% of the overall LHN calculated using the standard method and the Council should be seeking to ensure that the strategy to deliver this figure is effective, positively prepared and justified. At present, Gladman do not consider that there is a deliverable supply to even meet the stepped housing requirement figure.</p> <p>Crawley borough partially falls within Southern Water's Sussex North Water Resource Zone (WRZ), where there are concerns regarding the abstraction points and their relationship with biodiversity. It has been considered that new development must demonstrate that it is water neutral. Currently the Local Plan approach to enable development, aligned with the Water Neutrality Study Part C, is through a combination of on-site water efficiency measures (for residential developments usage must be limited at 85 litres, per person, per day) and off-setting elsewhere within the WRZ.</p> <p>It is understood that the Council have undertaken a pilot project on increasing water efficiency on some of their own housing stock, realising enough capacity to deliver a further 206 dwellings at Breezehurst Drive and Longley House over years 1-5 of the Local Plan.</p> <p>The Council have also committed £1 million to fund additional water efficiency retrofitting of their housing stock in order to increase water credit capacity and bring forward the delivery of developments. Additionally, the offsetting scheme is in the process of being created with a business case anticipated to be presented in April 2023 and an indicative operational date for the scheme of late 2023. However, there is</p>

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			<p>no published timetable or certainty in relation to the development of the offsetting scheme and the Part C study highlights in paragraph 121, "...an offsetting scheme is unlikely to be able to deliver significant offsetting in 2023...and the amount of growth that could be accommodated in 2023 is limited..."⁴.</p> <p>It is also known that without sufficient upfront offsetting, the amount of growth will be restricted until a time where water neutrality can be achieved⁵. Therefore, any delay post 2023 of securing reliable and effective offsetting will significantly impact the delivery of housing within the Local Plan trajectory.</p> <p>Overall, the Council identify 2,405 dwellings within their years 1-5 supply (2024-2029) with 1,893 dwellings subject to water neutrality requirements. Yet, sections 4 and 5 of the Topic 4 Paper: Housing Supply appear to only highlight that the 206 dwellings, previously mentioned, have secured mitigation solutions.</p> <p>Significant work is required to secure the offsetting scheme which will be required until Southern Water can secure a long term solution⁶. In this regard, there is significant uncertainty regarding the delivery of the water neutrality offsetting scheme which is not supported by robust evidence within the Local Plan evidence base and its impact on the delivery of planned development, particularly within the first five years of the revised plan period.</p> <p>Thirdly, as highlighted in paragraph 3.27 of this representation, the Council are only seeking to meet 42% of the LHN within the borough's administrative boundary due to various constraints. Gladman acknowledge the restrictions to meeting the identified development needs in the borough, however it has become apparent that it is neighbouring authorities are not currently willing to assist in addressing the anticipated unmet needs of 7,050 dwellings over the plan period. In response to the latest Duty to Cooperate engagement by CBC in April 2023 regarding the borough's unmet needs, 8 Council's responded highlighting that they were currently unable to assist in delivering unmet needs, including Horsham who previously were in a position to assist, providing 150 dwellings per annum towards Crawley's unmet housing needs but can no longer commit to assisting Crawley meet these needs primarily due to water neutrality circumstances.</p> <p>Gladman do not consider that this position has been justified by appropriate evidence and Crawley should proactively prepare a joint evidence base, including a SHLAA, to fully understand the position of meeting housing needs across the region to ensure that their housing needs over the emerging plan period can be met in full. This approach has been undertaken previously by CBC, Mid Sussex and Horsham Councils in the form of the 'At Crawley Study (2009)', 'New Market Town Study (2010)' and 'West Sussex Bio City (2010)'. If the identified housing needs cannot be met in full now, a solution and strategy to ensure these houses are delivered over future years must be provided.</p>

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			<p>The West Of Crawley site promoted by Homes England is functionally related to Crawley and while Horsham do not currently consider that they can contribute to CBCs unmet housing needs this site must be the focus for further engagement and consideration.</p> <p>Ultimately, Gladman consider that CBC should delay any further progression of the emerging Local Plan until there is greater certainty in relation to the WRZ offsetting scheme enabling the deliverability of the Local Plan to be demonstrated. This will also enable neighbouring authorities to have further clarification on their circumstance and ability to assist in delivering CBC's unmet housing needs. Overall, this would provide a more comprehensive approach to ensure that the identified development needs for the borough can be delivered. At present the strategy for meeting the identified housing needs of Crawley is not positively prepared, justified or effective and therefore the Plan cannot be considered sound.</p> <p>Suggested Modifications:</p>
REP/033 (2023)	Horsham District Council	H1	<p>Strategic Policy H1: Housing Provision</p> <p>We support aspects of this policy, in particular references that all reasonable opportunities will be considered to develop on brownfield sites and surplus green space and to capitalise on town centre living.</p> <p>However, we consider that the policy is not completely justified as it stands.</p> <p>As we have expressed previously, we recognise that Crawley Borough is highly constrained for the reasons set out in the Local Plan, and accordingly that the Council will be unable to fully address housing needs within its administrative area.</p> <p>It was the expectation that density work was being undertaken with the view to optimising the amount of housing that could be delivered on proposed housing sites, potentially increasing the amount of housing that the Local Plan would identify as coming forward within the borough and thereby reducing the identified level of unmet needs. Whilst there have been some increases in homes proposed on some allocated sites, it is not clear how these increases directly relate to the Compact Residential Development Study. We have further identified issues with the effectiveness of this work in response to policies CL4 and H2.</p> <p>Similarly, as we also express in response to policy H3a, we are not clear as to why there appears to have been no work undertaken to examine the potential that estate regeneration projects could make to assist in meeting unmet needs within Crawley Borough.</p> <p>We are supportive of the further increase of the windfall allowance to 100 dwellings per annum, as expressed in paragraphs 12.15 and 12.16 and agree that your evidence base shows that this is a realistic figure to include within your Local Plan.</p>

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			<p>As we have set out in our comments above in relation to paragraph 12.17 to 12.23, HDC is unlikely to be able to assist in addressing Crawley's unmet housing needs. In this context, we do not think the final paragraph of the policy wording is, in its current form, justified nor do we think that paragraph 12.39 recognises the position that HDC finds itself in.</p> <p>Suggested Modifications: Changes sought: Whilst we are committed to working in a collective and positive manner across the Northern West Sussex Housing Market Area (NWSHMA) as our Local Plans advance, HDC is unable to commit to apportioning any development that may take place within Horsham District to meet the needs of Crawley Borough. The final paragraph of the policy should therefore be altered to remove the suggestion that development at such locations would address unmet needs arising specifically in Crawley. It would however be acceptable to refer to ongoing joint work across the NWSHMA, and exploration of the potential to meet some of Crawley's education and affordable housing needs.</p> <p>Whilst we are pleased that recognition of the assistance provided to CBC in the existing Local Plan (Horsham District Planning Framework) is included within paragraph 12.39, we think the final sentence should be clear that it is unlikely that HDC will be able to assist in addressing unmet needs in this Local Plan cycle.</p>
REP/050 (2023)	Homes England	H1	<p>West of Ifield Please find enclosed at Annexe A representations by Homes England to the Draft Crawley Borough Local Plan Review 2024 – 2040 Regulation 19 consultation (herein referred to as the 'Draft Crawley Local Plan'). These supersede previous Regulation 19 representations dated 29th June 2021.</p> <p>This response relates to Homes England's interests as a major landowner / promoter with a land interest at the Land West of Ifield, shown as SA101 in the Horsham District Council Regulation 18 Local Plan and which was identified as a preferred allocation site, Policy HA2, in the draft Horsham District Council Regulation 19 document (noting this was not consulted upon). The site falls both within and adjoining Crawley Borough Council's administrative boundary and directly impacts on, or is directly impacted by, proposals set out in the Draft Crawley Local Plan and supporting evidence base.</p> <p>Within the context of a significant undersupply of housing land being proposed in the Draft Crawley Local Plan and the need for other identified development needs (such as education and health) and delivery of strategic infrastructure to be facilitated by development outside of the Crawley, West of Ifield can demonstrably and proactively respond in a timely manner to the strategic growth priorities and unmet development needs within the Borough.</p> <p>This response is therefore targeted, focusing on potential soundness issues that may impact on the delivery of the emerging Land West of Ifield proposals, or set out where changes to the Draft Crawley Local Plan should strengthen commitment to and support delivery of Land West of Ifield as an urban extension</p>

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			<p>required to meet identified development needs within Crawley and satisfy the authorities Duty to Cooperate.</p> <p>Separate responses will be submitted by Homes England in relation to its other land interests within the Crawley administrative area.</p> <p>Summary of Representations</p> <p>The following points raise issues of potential soundness that need to be addressed:</p> <ul style="list-style-type: none"> • Duty to Cooperate: It is noted that at the time of this Regulation 19 consultation, a Statement of Common Ground (SoCG) with Horsham District Council has not been published. As per the National Planning Policy Framework (NPPF) and national guidance, to be found sound it is necessary for plans to be positively prepared in a way that seeks to accommodate identified needs with a SoCG prepared and updates to be published throughout the preparation of the Plan. Therefore, until such a time as a SoCG is published to demonstrate ongoing discussions have been held with Horsham District Council and how significant shortfall in housing supply is being considered by adjoining authorities, the Plan is not considered to be sound and may not demonstrate legal compliance. • Paragraph 12.23 sets out a number of conditions that any future urban extensions must meet in order for Crawley Borough Council to support. As currently worded the supporting text is unsound as they are neither justified or effective. Given the significant undersupply of housing land over the Plan period and the substantial reliance on adjacent urban extensions to meet unmet housing needs and other development needs over the Plan period, the Plan should be proactive in supporting the delivery of urban extensions adjacent to the boundary, working with neighbouring authorities rather than seeking to resist them in the event that a detailed list of fixed criteria cannot be met. To be sound, the list should be presented as desired outcomes, ways in which the authority will work collaboratively with neighbouring authorities to meet the unmet needs rather than a series of 'tests' that necessitate or require that certain conditions 'must' be met, in order for Crawley Borough Council to support proposals - without the necessary evidence being available. <ul style="list-style-type: none"> o criterion ii: the requirement for the scoping design and delivery of the Western Multi-Modal Transport Link prior to completion of any dwellings is not justified. The approach is not supported by the evidence set out in the Crawley Transport Study June 2022 (Scenario 3). To be justified, the triggers and requirement for tripartite agreement to any delivery strategy should be removed from the supporting text and amended to allow the scope and delivery of the Crawley Western Link to be informed at application stage by evidence and assessments, with potential for phased delivery if supported by the evidence at that time. <p>Against the assessment criteria set out in Para 12.23, the following further comments on soundness are made:</p>

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			<p>criterion ii: the requirement for the scoping design and delivery of the Western Multi-Modal Transport Link prior to completion of any dwellings is not justified. The approach is not supported by the evidence set out in the Crawley Transport Study June 2022 (Scenario 3). To be justified, the triggers and requirement for tripartite agreement to any delivery strategy should be removed from the supporting text and amended to allow the scope and delivery of the Crawley Western Link to be informed at application stage by evidence and assessments, with potential for phased delivery if supported by the evidence at that time.</p> <p>criterion vii: The provision of affordable housing targets for developments outside the council's administrative area should be removed in the context that the requirement is not justified and should be identified and tested through the relevant Local Plan of the adjoining authority in which the allocation is to be made, in which the full impact of setting affordable housing requirements at 40% can be tested in full and alongside other policy requirements.</p> <p>criterion xi: additional wording should be included to ensure consistency with national policy. The criterion should be updated to be clear that development that results in the loss of ancient woodland / veteran trees should be refused "unless there are wholly exceptional reasons, and a suitable compensation strategy exists" in line with NPPF Para 180 (c).</p> <p>criterion xiii: whilst Homes England supports the delivery of high quality and well-designed places, the requirement on urban extensions to demonstrate exemplar standards is not justified in as much as 'exemplar' is not defined and has not been tested alongside other policy requirements as part of the relevant Local Plan evidence base.</p> <p>criterion xiv: The requirement for a 'bespoke Area Wide Design Assessment tool' should be removed from the supporting text as it is not justified. Whilst Homes England supports the delivery of integrated and distinctive places, national policy is clear that the appropriate tools shall be determined by the strategic plan-making authority, and the wording is ambiguous, contrary to paragraph 16 of the NPPF.</p> <p>Policy CL8: this policy should recognise the need for housing across the wider area and the role of the rural fringe to provide sustainable and active travel connectivity. The policy should recognise the importance of connectivity and the opportunity to contain essential sustainable active travel links to new sustainable urban extensions outside of the built-up area in support of other policies in the Plan. The wording should further be updated to be clear and unambiguous, as required by NPPF paragraph 16, to be consistent with national policy.</p> <p>Supporting text to Policy IN2: The Local Plan should be flexible to ensure that it remains up to date and justified against evidence across the plan period. As such, the specificity in number of forms of entry</p>

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			<p>required for secondary education is recommended to be removed as is best dealt with through the supporting Infrastructure Delivery Plan.</p> <p>Conflict between GAT2 and ST4: Homes England welcomes the changes to the policy ST4 that seeks to resolve or minimise potential conflict between the Gatwick safeguarding area and area of search for the Western Multi-Modal Transport Link. Homes England support the flexible approach at the eastern (A23) end of the proposed link that seeks to balance the risk of safeguarding conflict against the potential loss of employment land and ability to deliver the CWL as a strategic transport link in the timescales set out in the West Sussex Local Transport Plan. The feasibility study shows alternative options that could be deployed in the event a southern runway does come forward which is considered sound given the wider land use impacts that would need to be considered as part of any runway proposal at that time.</p> <p>Policy ST4: recognition of the strategic importance of the Crawley Western Link and refinement of the area of search is welcomed. However, the policy is not effective as it does not consider the necessary delivery issues in as much as it does not set out how development coming forward within the safeguarded corridor will be required to take account of the CWL or how the necessary funding will be secured through the proposed infrastructure delivery requirements set out in Policy IN1. Furthermore, as a strategically important scheme that is identified as being 'developer led' in the West Sussex Transport Plan 2022 -2026, reference to potential land assembly mechanisms – including potential use of CPO or supporting development proposals that help facilitate the Western Multi-Modal Transport Link should be included within the policy wording rather than the supporting text.</p> <p>Policy GI3: In order to be effective and consistent with national policy, this policy should be updated to remove reference to a 2020 biodiversity net gain baseline for development sites. Unless surveys have already been completed, it would not be possible to retrospectively determine the baseline in 2020 and this would not provide an accurate pre-development baseline for developments coming forward across the lifetime of the plan. Any baseline assessment should be undertaken with the DEFRA metric published at that time.</p> <p>Policy GI4: while the policy intention and identification of Local Green Spaces is supported, the current wording is not effective as it is not consistent with wider plan objectives and policy requirements. Wording should be updated to <i>“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 or where it supports other policies in this Plan”</i>.</p> <p>Policy EP4 – the current wording to restrict noise-sensitive development above the 60dB contour for aviation transport noise is not justified by evidence, particularly when considered against national</p>

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			<p>guidance and standards. A more flexible approach to allow development within 60-63dB where suitable mitigation measures can be demonstrated, with the UAEL increased to above 63dB, is recommended.</p> <p>Policy H8: As per Policy EP4 above, a more flexible approach to the assessment of noise impacts is recommended in order for the policy to be justified against national guidance and recent decisions related to Gypsy and Traveller Sites in proximity to airports.</p> <p>Homes England considers that the changes set out in this response are necessary to address the above to ensure that the draft Crawley Local Plan is sound, legally compliant and to provide further clarity on how the policies will be applied to future development proposals. Homes England would like to participate at the Examination in Public in relation to the above points.</p> <p>Please contact me if you would like to discuss any points raised in this submission. In the meantime, I would be grateful if you could continue to keep Homes England informed in relation to the Draft Crawley Local Plan and progression towards Examination.</p> <p>Annexe A: Introduction</p> <p>Homes England is an executive non-departmental public body, sponsored by the Department of Levelling Up, Housing and Communities, and the governments' Housing and Regeneration Agency. Homes England has the aspiration, influence, expertise and resource to drive positive market change. By releasing more land to developers who want to make homes happen, Homes England assists in the delivery of the new homes England needs and helps to improve neighbourhoods and grow communities. Homes England works in collaboration with partners who share our ambition, including local authorities, private developers, housing associations, lenders and infrastructure providers.</p> <p>As set out in our new Strategic Plan 2023-28, our mission is to drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice, the levelling up of communities across England and the creation of places people are proud to call home.</p> <p>A key focus for Homes England is the quality of what is being delivered, including championing environmental sustainability, design and beauty in homes and places that we support to create distinctive places and spaces that are designed for people to use and thrive. We also recognise that mixed-use regeneration to deliver housing alongside employment, retail and leisure space helps to create vibrant and successful places.</p> <p>Purpose of Representations</p> <p>Pursuant to Regulation 19 of Town and Country Planning Act (Local Planning) (England) Regulations 2012 these representations are made in respect of the Draft Crawley Local Plan to confirm our position in</p>

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			<p>respect of our land interests at Land West of Ifield. We also confirm that we wish in due course to participate in the relevant sessions of the public examination.</p> <p>These representations set out our position of support for the Draft Crawley Local Plan as a whole and identifies the changes we consider to be necessary to make the Plan sound, legally compliant and/or provide further clarity on how the policies will be applied.</p> <p>Where amendments are proposed, these are considered necessary to ensure that the Draft Crawley Local Plan fully meets the soundness tests as set out in Paragraph 35 of the National Planning Policy Framework 2021 (NPPF) (paragraph 35).</p> <p>These representations are written only in regard to Homes England's interests at Land West of Ifield. Separate representations for the other sites have been submitted where necessary.</p> <p>Documents Reviewed</p> <p>In preparing these representations, the following documents have been reviewed:</p> <ul style="list-style-type: none"> Crawley submission Draft Local Plan (May 2023) Topic Paper 1 – Unmet Needs and Duty to Co-operate (May 2023) Strategic Housing Market Assessment November 2019 Strategic Housing Land Availability Assessment February 2023 Housing Trajectory March 2023 Economic Growth Assessment supplementary update for Crawley January 2023 Employment Land Availability Assessment 31 March 2023 Compact residential Development Study 2023 Retail Commercial Leisure and Town Centre Needs Assessment 2020 Topic Paper 7: Development and noise technical appendix Planning Noise Advice Document Sussex (2021) Topic Paper 2: Gatwick Airport Crawley Infrastructure Plan May 2023 Draft Duty to Cooperate Statement May 2023 Sustainability Appraisal SA SEA Report May 2023 Crawley Transport Study June 2022 Gypsy, Traveller, and Travelling Showpeople Accommodation Needs Assessment Consultation Draft May 2023 West Sussex Transport Plan 2022 - 2026

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			<p>Land West of Ifield For clarity and through this representation, 'Land West of Ifield' is the site shown as SA101 in the Horsham District Council Regulation 18 Local Plan and which was identified as a preferred allocation site, Policy HA2, in the draft Horsham District Council Regulation 19 document (noting this was not consulted upon). This site is under the majority control of Homes England. The site is ideally located to make a significant contribution to the housing and infrastructure needs, and economic priorities of Crawley, respond proactively and in a timely manner to the strategic growth priorities and unmet development needs within the Borough.</p> <p>The emerging allocation (SA101) is located within Horsham District, but a small portion of the wider site under Homes England's ownership lies within Crawley Borough (Ifield Brook Meadows Local Wildlife Site (Policy GI2) and Local Green Space (Policy GI4)).</p> <p>Land West of Ifield provides the opportunity to realise significant opportunities and benefits for Crawley and meet a number of the significant unmet needs identified in the Draft Crawley Local Plan and Topic Paper 1 Unmet needs and Duty to Co-operate – including housing, education, health – and other strategic infrastructure provision, in a manner which aligns with the Vision within the Draft Crawley Local Plan, to create high quality facilities and strong communities, improve job opportunities, meet housing needs and protect the environment, including:</p> <ul style="list-style-type: none"> - 3,000 market and affordable homes, to help meet the needs of Horsham and Crawley - 2 New Schools, 1 Primary and 1 Secondary - up to 2,700 jobs on/off site, providing skills and training opportunities - A Neighbourhood Centre, with community space, opportunities for health provisions - Delivery of part of Western Multi-Modal Transport Link and investment in sustainable and active travel opportunities identified in the supporting Infrastructure Delivery Plan. <p>The emerging allocation aligns with the objectives found in Homes England's Strategic Plan 2023 to 2028, to deliver "key enabling infrastructure in place to unlock development" and to deliver "mixed-use places that create value and benefit local communities". Working with a range of delivery partners, Homes England will act as a master developer to accelerate the delivery of key infrastructure to facilitate housing delivery in an efficient and effective manner, achieving the highest design and sustainability standards across the scheme through the construction process as well as delivering significant social, economic and environmental benefits to the existing neighbourhoods of Crawley.</p> <p>Wider Strategic Opportunity – Land West of Crawley Land West of Ifield is located within a broader area of search identified as 'Land West of Crawley' in the Horsham Draft Local Plan Regulation 18 Consultation March 2020.</p>

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			<p>Subject to the detail and final decisions on strategic allocations within the Draft Horsham Local Plan, this wider growth opportunity could continue to play an important role in meeting future development needs over multiple plan periods. The Draft Crawley Local Plan and supporting evidence base sets out the importance of long-term working with neighbouring authorities and the role of sustainable urban extensions in meeting immediate and longer-term unmet development needs and infrastructure delivery. It is therefore important that the Draft Crawley Local Plan does not prejudice the delivery of Land West of Ifield.</p> <p>Response to the Draft Crawley Local Plan Regulation 19 consultation document May 2023 Spatial Strategy and Duty to Cooperate</p> <p>Policy H1 (housing provision) states that the Draft Crawley Local Plan shall provide for a minimum of 5,030 dwellings across the plan period to 2040, with a resultant unmet housing need of approximately 7,050 dwellings. Homes England recognises that given the tightly drawn boundaries of Crawley there are challenges in meeting the full housing needs as set by the standard methodology within the council's administrative area and that the unmet need increases overtime in line with the stepped housing trajectory. Homes England notes that since the previous consultations, Crawley Borough Council has sought to increase the amount of housing that can be accommodated within the administrative area through the Compact Residential Development Study. While no view is taken as to what the exact requirement for meeting the unmet need is at this stage, there is unquestionably a significant unmet housing needs from this authority, with the unmet needs having to be met through working with neighbouring authorities and proactively identifying locations for sustainable urban extensions close or adjacent to the Crawley boundary.</p> <p>Furthermore, the Infrastructure Plan (May 2023), Economic Growth Assessment and Duty to Cooperate Statement (May 2023) set out that there are wider unmet needs arising that cannot be accommodated within the borough's administrative area due, predominantly, due to the tightly drawn boundary:</p> <ul style="list-style-type: none"> - A site for a 6-8FE secondary school, catering for 180-240 places per year group - Special Educational Needs - GP provision (noting reorganisation into Primary Care Networks is being sought to increase resilience and enhance capacity) - Employment land required to support the unmet housing needs (the evidence suggests that additional employment land would be required to support any future urban extensions). <p>The NPPF recognises at paragraph 73 that the delivery of large numbers of new homes can often be best achieved through planning for larger scale development where they are well located, designed and are supported by necessary infrastructure. The NPPF further encourages authorities to work together to identify suitable locations for such development where it can meet identified needs in sustainable way (paragraph 35a and 73).</p>

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			<p>In this context, to address the above unmet needs, Homes England welcomes Policy H1 which provides a commitment for Crawley Borough Council to work closely with neighbouring authorities to explore opportunities, particularly with regard to urban extensions. Given the shortfall in housing supply increases across the plan period, there is a real opportunity for neighbouring large-scale extensions to deliver the homes and supporting infrastructure when they are most needed.</p> <p>As such, <i>in principle</i> the proposed approach through the Draft Crawley Local Plan and within Policy H1 to meet as many homes as possible within the authority's boundary, and otherwise engage with neighbouring authorities to address any unmet needs, is considered to be consistent with national policy, justified and effective, and, in this regard, to be sound against paragraph 35 of the NPPF.</p> <p>Indeed, the Land West of Ifield would align with and support the approach taken within Policy H1 and the NPPF in this regard, as being capable of sustainably delivering homes, schools, employment, facilities, greenspace and new sustainable connections to Crawley as set out previously in these representations. In particular, the 'action' within the Duty to Cooperate Statement May 2023 to continue ongoing discussions between Crawley Borough Council, Horsham District Council and Homes England as part of the Horsham District Local Plan Review process and through pre-application for Land West of Ifield proposals is particularly welcomed.</p> <p>However, the NPPF is clear that in order for the Draft Crawley Local Plan to be positively prepared and effective, and therefore sound, the strategy should be informed by agreements with neighbouring authorities, and in particular Statements of Common Ground. Indeed, the NPPG paragraph 009 Reference ID 61-009-20190315 further makes it clear that "<i>authorities should produce, maintain and update one or more statements of common ground throughout the plan making process</i>".</p> <p>In this regard, whilst the Duty to Cooperate Statement details the engagement that has been held with neighbouring authorities and ongoing actions, it is noted that at the time of this Regulation 19 consultation no Statement of Common Ground between Crawley Borough Council and Horsham District Council has been published (confirmed in Table 2.1 of the Duty to Cooperate Statement). On this basis, it is not possible to understand those matters (including housing and wider infrastructure delivery) which have been agreed or are part of ongoing discussions with Horsham District Council, which has particular relevance to the requirements sought in paragraph 12.23 of the Draft Crawley Local Plan, as discussed below.</p> <p>It is therefore strongly recommended that a Statement of Common Ground is published at the earliest opportunity with the remaining authorities, and in particular Horsham District Council, and until then the Plan cannot be considered legally compliant or sound.</p> <p>Suggested Modifications:</p>

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REP/058	Reigate & Banstead Council	Unmet housing need	<p>Thank you for providing Reigate and Banstead Borough Council the opportunity to comment on the Regulation 19 Crawley Submission Version Local Plan 2024 – 2040 (February 2023). We previously submitted our response to the Regulation 19 Crawley Borough Local Plan 2021-2037 (January 2021), and associated key documents on the 30th June 2021. We will therefore focus this response on the new changes since then, on the understanding that our response to the previous Regulation 19 consultation will be submitted in full, to the Secretary of State for the Local Plan’s examination, along with responses received in this consultation. We would also like to note that we submitted our Duty to Cooperate (“DtC”) response to the Draft Duty to Cooperate Statement on 28th April 2023.</p> <p>Unmet Housing Need Reigate and Banstead Borough Council (“RBBC”) note that Crawley Borough Council (“CBC”) will have an unmet housing need of approximately 7,050 dwellings over the Plan period. As mentioned in our recent Draft Duty to Cooperate Statement response, our borough operates in a different housing market to CBC. RBBC operate wholly in the East Surrey housing market and as per our agreement in our most recent Statement of Common Ground (2021), we are not in a position to meet any of CBC’s unmet housing need.</p> <p>Suggested Modifications:</p>
REP/066 (2023)	Mid Sussex District Council	Housing Supply and Unmet need	<p>Housing Supply and Unmet Need There has been a long-standing and ongoing engagement between the Northern West Sussex Housing Market Area (NWS HMA) authorities (Crawley, Horsham and Mid Sussex), and therefore the position in relation to Crawley’s housing need and supply is understood.</p> <p>The three authorities have agreed that housing supply is a strategic cross-boundary issue and consequently have worked effectively to understand and assess options for maximising housing supply to meet local needs within the HMA.</p> <p>This approach is set out in the Housing Statement of Common Ground which is being finalised by the three authorities and which will capture the agreements between the NWS HMA authorities on principles such as the HMA boundary, housing need, site selection processes and considerations for housing supply.</p> <p>Mid Sussex District Council notes that the Crawley Submission Local Plan updates the unmet need position, such that the current calculation shows an unmet need of 7,050 dwellings over the plan period 2024 - 2040, and that Crawley Borough Council has formally requested assistance to meeting the unmet need.</p> <p>The adopted Mid Sussex District Plan (policy DP5: Planning to Meet Future Housing Need) demonstrates that MSDC is committed to working with neighbouring Councils on an ongoing basis to address housing needs across the HMA based on the evidence. The adopted District Plan includes a contribution of 1,500</p>

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			<p>dwelling to meet the unmet need arising in the HMA which, alongside the contribution made by Horsham District Council, ensured that the HMA housing need could be met in full. The Council remains committed to working jointly and proactively on this matter and the forthcoming Housing Statement of Common Ground will demonstrate this commitment across the HMA.</p> <p>As you are aware, Mid Sussex District Council published a draft District Plan (Regulation 18) for consultation in November 2022.</p> <p>In respect to the ongoing engagement with Councils in the NWSHMA ahead of publishing its Regulation 18 draft, Mid Sussex District Council:</p> <ul style="list-style-type: none"> • shared the draft Site Selection Methodology and invited comments before publication; • held briefings for NWSHMA Councils to share the initial outcomes of the Site Selection process, which included: <ul style="list-style-type: none"> o examples of sites that performed well against the Site Selection criteria and would therefore have potential allocation, and those that have been rejected due to constraints and deliverability issues o outcomes from the evidence base, particularly Transport and Air Quality modelling • commissioned an Urban Capacity Study, by external consultants, with an objective to maximise brownfield development in urban areas to seek to increase supply from this source. <p>The Regulation 18 draft District Plan established a housing need of 20,142 for Mid Sussex. As a result of the evidenced outcomes from the Site Selection process and findings from the evidence base, the draft District Plan proposed a total supply of 20,444. Therefore, the draft District Plan demonstrated an over-supply of 302 dwellings.</p> <p>The Council is reviewing the responses from all parties during Regulation 18 consultation. This includes assessment of comments received from those promoting sites omitted from the Regulation 18 plan, and new sites submitted during the consultation. This work is ongoing and the potential housing supply in the Regulation 19 Plan will be subject to completion of this work and detailed testing through the evidence base. As such, the Council is currently not in a position to confirm the total deliverable housing in the District and therefore the amount of housing it may be able to provide to meet unmet need.</p> <p>This Council will continue to positively engage with Crawley Borough Council as the review of the District Plan progresses, in line with the agreed principles and mechanisms outlined in the NWS Statement of Common Ground, forthcoming Housing Statement of Common Ground and other relevant cross-authority groupings.</p> <p>Suggested Modifications:</p>

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	Persimmon Homes	H1	<p>The housing provision proposed by Policy H1 for 5,030 new dwellings undershoots the housing need by 58% as stated in paragraph 12.12 of the Draft Plan. The Council proposes that only 42% of its housing need would be met within its boundary. To accord with paragraph 11b of the NPPF, it is necessary to demonstrate that a clear reason is given to restrict growth to this extent is given in accordance with paragraph 2b (i) and (ii). A clear reason to restrict growth to this extent, supported by reference to the NPPF, is not given and as a result this policy is not effective in responding to housing needs, it is not justified by national policy and it is not positively prepared.</p> <p>The five sites proposed by Persimmon Homes as part of the Forge Wood development are not subject to the constraints of paragraph 2b (i) and (ii) of the NPPF and the delivery of these land parcels should be reflected in the housing provision by Policy H1. These parcels could be delivered for residential or non-residential use with appropriate mitigation to ensure that a satisfactory living or working environment can be provided having regards to a second wide spaced runway at Gatwick Airport.</p> <p>Suggested Modifications: The five land parcels proposed for development by Persimmon at Forge Wood should be identified as potential development sites for residential use as part of this new neighbourhood which is still under construction.</p>
REP/119 (2023)	Turley on behalf of A2 Dominion	H1	<p>A2DOMINION A2Dominion is a housing provider with a social purpose and builder of award-winning affordable, private and social-rented homes. They pursue their business with a social purpose, reinvesting profits from private sales into building new affordable homes, managing existing homes and supporting local communities. They deliver on all tenures on their development sites, retaining a long term interest via the ownership and management the affordable housing and open areas.</p> <p>A2Dominion's vision is to improve people's lives through high-quality homes and services. A2Dominion has over 39,293 homes across London and southern England and are committed to developing new homes that are genuinely sustainable.</p> <p>A2Dominion have led the development of a new flagship eco town at North West Bicester; a pioneering project backed by environmental integrity and a long-term vision for the area.</p> <p>COTTESMORE VILLAGE A2Dominion has recently promoted an area of land to the west of Pease Pottage for residential development to Mid Sussex District Council. A2Dominion has provided details to Horsham District Council of a wider opportunity referred to as 'Cottesmore Village' where the vision is for a sustainable new community located in close proximity to Crawley.</p> <p>The site is circa 83ha, and is currently in use as Cottesmore Hotel and Country Club. Due to the recent decline in Golf the site opens up a new opportunity to create a sustainable community incorporating the</p>

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			<p>existing Hotel and Country Club, open space, community sports facilities and business hub within a landscaped setting. The site can be separated into two areas of land connected by a pedestrian footpath. Current access into the site is taken from Forest Road to the south, where the current Club main facilities are located including a Club House, Hotel and Spa.</p> <p>Cottesmore Village is in a strategically significant location on the edge of the major urban area of Crawley (and its range of facilities, employment opportunities and transport connections), close to the strategic highway network and within the 'Gatwick Diamond' which has followed from the consistent recognition of this area's importance in regional planning.</p> <p>The interaction between Horsham District and Crawley was acknowledged in the HDPF which states explains how the 2001 Census showed 40% of working people who live in Horsham District commute outside it to work. Of these, 58% travelled to Crawley and London. The HDPF also explains how the District has been recognised as operating at a pivotal point of a triangle of large urban communities between Crawley/Gatwick and Portsmouth and Brighton on the south coast.</p> <p>A number of local authorities in the area (Surrey County Council, West Sussex County Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, Tandridge District Council) have formed the Gatwick Diamond local authorities. The Authorities published a Gatwick Diamond Local Strategic Statement in 2012, with an updated version published in June 2017. A Memorandum of Understanding (MoU) exists between the Gatwick Diamond authorities as a mechanism for interauthority co-operation to promote the planning of sustainable development across the area. The Local Strategic Statement from 2017 explains that the Vision to 2031 is "By 2031 the Gatwick Diamond will be a worldclass, internationally recognised business location achieving sustainable prosperity and growth."</p> <p>A2Dominion consider that these considerations, allied with the significant unmet housing need arising from within Crawley Borough reinforce the strategic location of the area and the role in which Cottesmore Village could play.</p> <p>The work undertaken by A2Dominion demonstrates that Cottesmore Village could provide:</p> <ul style="list-style-type: none"> • Residential areas totalling circa 19.67ha across the site. There will be differing character areas to each parcel with lower densities around the development edge and set back from a listed building adjoining the site. All residential development is within a landscape country park setting respecting the natural character of the site; • A local centre, which could include uses such as a doctors' surgery, community hall, coffee shop, convenience store and Business and Innovation Hub including a delivery hub as we change to online shopping more and other facilities subject to detailed masterplanning; A primary school; • Sports/play pitches;

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			<ul style="list-style-type: none"> • A community food production area; and • Significant levels of open space. <p>Vehicular access to the site is proposed from Forest Road via a new roundabout junction. Cottesmore Village will bring forward new facilities to offer new and existing residents much greater opportunity to travel locally on foot and by bicycle. The emerging masterplan shows the following connections:</p> <ul style="list-style-type: none"> • A connection eastwards to a signed cycle route to Crawley and off-site enhancements of that cycle route; • A connection northwards to Crawley via Bridleway 1546 which will benefit from improved surfacing, drainage and lighting (particularly the well-used underpass beneath the A264) all of which can be delivered by Cottesmore Village; • A connection north-eastwards via Footpath 1545 through Buchan Country Park and connecting with Horsham Road, Crawley. • A connection south-eastwards via Footpath 1545 to Forest Road. It is proposed to provide a footway in the existing highway verge along the northern side of Forest Road/Horsham Road to connect the site to Pease Pottage and vice versa. <p>In addition to the site's location close to Crawley, there is good opportunity for future bus routes (e.g. extended and enhanced existing services and/or new services) to be incorporated into Cottesmore Village. The proposed scheme could enhance the public transport connections in a number of ways including: Increasing the frequency of an existing bus route and divert it to serve Pease Pottage and the site e.g.;</p> <ul style="list-style-type: none"> - Extend the existing 271/273 Crawley to Brighton buses from eastern Pease Pottage to the site and increase the frequency from 1 to 2 per hour to every 20-minutes; and/or - Divert the existing 23 Crawley to Worthing via Horsham buses from the A264 to serve Pease Pottage and the site and increase the frequency to every 20-minutes; and/or - Deliver a new hopper bus service between the site, Pease Pottage and central Crawley and/or Horsham (including the station(s)) operating with a circa 20-minute frequency. • The provision of bus stops with seating, timetable information and shelter within the site so that new residents have a very short walk to access buses. • The provision of real time information at the bus stops and on local buses <p>New homes can be designed to facilitate home working, e.g. through ensuring that there is a well designed, dedicated and separate space within the home where it is possible to work productively in terms of having sufficient room, segregation from the rest of the household as well as having somewhere comfortable, well ventilated and well lit. In addition, fast broadband speeds will be important.</p>

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			<p>The concept of development in the area where Cottesmore Village is located is outside of Crawley Borough and primarily within Horsham District and so A2Dominion acknowledge that it is not the role of the Crawley Borough Local Plan Review to allocate development in this area. However, as these representations consider, it is appropriate for the Local Plan Review to include text regarding the scale of unmet housing need, its economic significance and the way in which these matters could be addressed.</p> <p>Furthermore, we expect that Crawley Borough Council will be familiar with the concept of development in the area where Cottesmore Village is located as this was considered in a document published in September 2005 and titled 'Feasibility Study for Development Options at Crawley'.</p> <p>REPRESENTATIONS</p> <p>The following section of this letter sets out specific representations on behalf of A2Dominion in response to the content of the Regulation 19 Local Plan consultation document.</p> <p>Housing Provision</p> <p>Policy H1 (Housing Provision) of the draft Local Plan states that: <i>"The Local Plan makes provision for the development of a minimum of 5,030 net dwellings in the borough in the period 2024 to 2040</i> <i>This minimum requirement will be broken down into an annual average requirement on a stepped basis as follows:</i></p> <ul style="list-style-type: none"> • Years 1-5 (2024-29): 400 dwellings per annum (dpa) • Years 6-10 (2029-34): 360dpa • Years 11-16 (2034-40): 205dpa <p><i>After this supply is deducted from the identified housing need of 12,080 over the period 2024 to 2040, there will be a remaining unmet housing need, of approximately 7,050 dwellings, arising from Crawley over the Plan period. This will arise as follows:</i></p> <ul style="list-style-type: none"> • Years 1-5 (2024-29): 355dpa • Years 6-10 (2029-34): 395dpa • Years 11-16 (2034-40): 550dpa <p><i>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."</i> (our emphasis).</p> <p>The Housing Need Topic Paper (May 2023) (Topic Paper 3) published by CBC explains that the Standard Method results in a Local Housing Need figure of 755 dwellings per annum. We agree with that figure at the time of writing.</p>

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			<p>The level of development planned through Policy H1 is, as paragraph 12.36 of the draft Local Plan explains, 'supply-led', reflecting the limited land availability of the Borough, amongst other reasons. We welcome the fact that paragraph 12.38 of the draft Local Plan explains how "every opportunity for residential development within the borough has been fully considered". The draft Local Plan sets out (paragraph 12.39) that "approximately 42% of the borough's predicted housing need over the 16 years 2024 – 2040 can be met within the borough boundaries." That means that the greater part of the housing required in the Borough cannot be met within its administrative boundaries.</p> <p>It is also clear that Crawley is an economic hub in this region and that the presence of Gatwick Airport only serves to reinforce the town's role, highlighted by its location at the heart of the Gatwick Diamond. As such, A2Dominion firstly commend the Council for seeking to address its housing need as far as possible, but also note the importance of this need being addressed in a sustainable manner if the town's economic role is to be supported. The need to ensure that Crawley's housing need is met has broader socio-economic ramifications.</p> <p>Topic Paper 3: Housing Needs which has been published in support of the Local Plan explains¹ that "lower quartile house prices in Crawley are 10.7 times earnings and that whilst this might be below the Housing Market Area and West Sussex average, it is substantially higher than the national (England) average". Topic Paper 3 also records that² "The Updated SHMA found that the affordable housing need in Crawley equated to a total of 739 affordable homes per year, of which 563 (76%) dwellings were needed as rented affordable homes, and 176 (24%) dwellings were needed to be provided for affordable home ownership." In these circumstances, where the Local Plan recognises that provision will be made for a minimum of 5,030 net dwellings in the borough in the period 2024 to 2040 (representing an average of around 314 dwellings per annum over 16 years), and an affordable housing requirement (through Policy H5), it is absolutely clear that there will be a very significant unmet need for affordable housing. The annual average requirement for all forms of housing is less than half the requirement for affordable housing.</p> <p>In support of these concerns, we refer to the conclusions of the Sustainability Appraisal / Strategic Environmental Assessment (May 2023) published in support of the draft Local Plan. Appendix G of that document includes an assessment of the Local Plan policies and options. Those include different options for the scale of housing planned in the Borough. Options 8 and 9 for Policy H1 relate to a supply led housing requirement and demonstrate clear socio-economic weaknesses when compared to those options which plan for greater levels of delivery.</p> <p>A2Dominion consider that there are very strong socio-economic reasons why measures should be taken to ensure that the affordable housing needs arising from Crawley are properly addressed. However, we recognise that the tightly drawn administrative boundaries and constrained nature of the Borough present real obstacles to the delivery of housing in general, including affordable housing. Having established that</p>

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			<p>the affordable housing needs should be addressed, A2Dominion consider that this should be done as close as possible to where they arise to support economic, social and environmental sustainability. Topic Paper 3 recognises that the relationship between lower quartile house prices and earnings in Crawley is lower than HMA and West Sussex averages. With that in mind, there is a strong prospect that displacing housing delivery in general, but affordable housing in particular, away from Crawley may exacerbate those affordability issues. Furthermore, the draft Local Plan3 also recognises that Crawley’s residents are less likely to access higher paid jobs. Displacing housing, particularly affordable housing, intended to meet the needs of Crawley away from the town is likely to exacerbate the obstacles to accessing employment opportunities, and increase the cost of travel to them. By consequence, displacing housing away from Crawley, the overall effect is to increase unsustainable commuting patterns.</p> <p>Addressing Crawley’s Unmet Housing Needs</p> <p>We welcome the recognition at paragraphs 2.26 – 2.29 that the Crawley Local Plan is unable to make provision for all of the housing need within the Council’s administrative boundaries. Furthermore, we welcome the recognition (at paragraph 2.27) that “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”.</p> <p>In our submission, the economic significance of Crawley, and the role that it plays in the HMA and in the wider area (for example the wider Gatwick Diamond area) means that all efforts should be made to accommodate the unmet needs arising from the town. The failure to do so puts the economic growth and success of Crawley and the wider area at risk.</p> <p>We note that the Local Plan identifies that the unmet need to 2040 equates to 7,050 dwellings with this calculated by deducting the planned requirement (5,030 dwellings) from the identified housing need (12,080 dwellings). However, we understand that the planned requirement is a ‘supply-led’ calculation and as such, when calculating the degree of unmet need to be addressed by adjoining authorities, it may be necessary for them to provide a ‘buffer’ to ensure greater certainty that, in combination, the needs will be addressed.</p> <p>Furthermore, we would encourage dialogue to ensure that it is not just the total numerical housing requirement which is achieved as there remains a significant need for affordable housing in the HMA.</p> <p>We reserve the opportunity to submit further comments and evidence regarding the extent of the unmet need as the Plan progresses and further evidence emerges.</p> <p>Paragraph 2.29 of the draft Local Plan includes a table identifying the existing Objectively Assessed Housing Needs, existing Local Plan requirements and the Standard method requirement for Crawley,</p>

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			<p>Horsham and Mid Sussex Districts, as well as the North West Sussex HMA as a total. In each case (and cumulatively), the Standard Method results in an increased requirement relevant to the OAN or Local Plan requirements and demonstrates that the emerging Local Plans in Horsham and Mid Sussex are also likely to grapple with additional level of housing delivery, even before Crawley's needs are addressed.</p> <p>Given the significance we attach to addressing Crawley's unmet housing needs, we explore whether this could be achieved within the emerging planning context of adjoining authorities (Mole Valley; Reigate & Banstead; Tandridge; Mid Sussex; and Horsham):</p> <ul style="list-style-type: none"> • The SoCG with Mole Valley District (January 2021) records that the two authorities are within different HMAs (Mole Valley being in the Kingston and North East Surrey Housing Market Area) and that "Due to the need to undertake site-specific exceptional circumstances testing to determine whether it is appropriate for individual sites to be released from the Green Belt, it is not currently considered possible to meet any of Crawley's housing needs within Mole Valley." • The SoCG with Reigate & Banstead Borough (January 2021) records that the "There is some relationship between the North West Sussex Housing Market Area and the Horley area. However, RBBC as a whole falls within the East Surrey Housing Market Area." In addition, the SoCG records that "RBBC is not in a position to meet any of CBC's unmet housing need" • The delays associated with the Tandridge Local Plan are well known, with the Inspector having advised that significant work is required in relation to highways matters for example. In any event, it is relevant to note that the examination version of the Tandridge Local Plan does not make provision for the unmet needs of Crawley Borough Council. We note that there is no SoCG between TDC and CBC. • Mid Sussex District Council published the draft District Plan 2021-2039 for public consultation between the 7th November and the 19th December 2022. In the draft District Local Plan, Policy DPH1 sets the Local Housing Need figure of 20,142 dwellings between 2021 – 2039. The same policy sets out the total expected supply from all sources of 20,444 dwellings over that same period, representing an 'oversupply' of 302 dwellings. In our submission, those 302 dwellings should be taken as a buffer to the MSDC requirement. In our conclusion, the MSDC draft District Plan makes no numerical provision for the unmet needs of Crawley. • Horsham District Council consulted on the Regulation 18 Draft Local Plan between 17 February and 30 March 2020, however the Plan's progress has since been subject to a number of delays. In the 2020 consultation, HDC set out that the standard methodology calculation for Horsham District is calculated as 965 dwellings per annum, equating to a minimum of 17,370 homes in the period between 2019 and 2036. The exact level of supply being planned for is unclear given the scope of the consultation, however we note that there were three options considered for the housing requirement⁴: <ul style="list-style-type: none"> - 1,000 homes per annum, intended to address the minimum local housing need as determined using the Government's standard formula;

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			<ul style="list-style-type: none"> - 1,200 homes per annum, with this intended to “meet the local housing need and 5% buffer. It would also provide around 200 homes each year to help meet the unmet housing needs of Crawley in particular, and a small element in the Coastal Sussex area.”⁵ - 1,400 homes per annum, with this intended to “<i>meet the local housing need and 5% buffer and provide around 400 homes each year to help meet the unmet housing needs of Crawley and the Coastal Sussex area.</i>” <p>There are five authorities surrounding Crawley (Mole Valley, Reigate & Banstead, Tandridge, Mid Sussex and Horsham). Two of those have agreed common ground with Crawley BC that they are unable to accommodate the town’s unmet need, whilst the third makes no such provision in its emerging Local Plan. In addition, the capacity of the land to the north of Crawley is also reduced by the presence of Gatwick Airport (as demonstrated by the Safeguarded Land shown in Figure 1 of Topic Paper 2 in relation to Gatwick Airport).</p> <p>The remaining two (Horsham and Mid Sussex) are at differing stages in the plan-making process. In our submission, this wider context reinforces the fact that the Crawley Local Plan should not include any text which might be taken as suggesting that the growth of Crawley should only occur in certain directions.</p> <p>In our submission, the only realistic opportunities to address Crawley’s unmet housing needs are within Mid Sussex and Horsham Districts. The emerging Local Plan for MSDC makes no such provision, whereas the situation in Horsham is unclear.</p> <p>We note that paragraph 3.1.11 of CBC’s ‘Topic Paper 1: Unmet Needs and Duty to Cooperate’ (May 2023) states that “<i>The draft Mid Sussex District Plan Review (Regulation 18) was published for public consultation between November and December 2022. This proposed a strategic allocation on Crawley’s eastern boundary at Crabbet Park for approximately 2,300 new dwellings (1,500 within the Plan period) as part of a new sustainable community.</i>”</p> <p>Our understanding is that the development being considered at Crabbet Park by MSDC is accounted within the overall supply for their draft Local Plan, and therefore would play no role in meeting the numerical requirements of Crawley Borough Council.</p> <p>Whilst we support CBC’s references to working with other authorities to address unmet housing needs, our review demonstrates that significant progress will be required in order that this is achieved.</p> <p>Suggested Modifications:</p>
REP/130 (2023)	Home Builders Federation	Unmet housing needs	8. In our initial representations on the local plan, we raised concerns that no up to date Statements of Common Ground establishing how the unmet needs of Crawley will be met in full had been published, an issue we considered to be unacceptable given that the Borough’s unmet housing needs were increasing.

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			<p>Now that unmet needs have risen again, with paragraph 2.26 being amended to state that unmet needs are now approximately 7,050 homes compared to the 5,925 home shortfall in the first iteration of this plan, we would have expected further work to have been undertaken by the Council and their neighbouring authorities to agree to these needs being met elsewhere. However, the only statement of common ground that has been published still dates from 2020 and does not reflect the current position. If the Council are to show that they have co-operated effectively with their neighbours an updated statement of common ground setting out how unmet needs will be addressed must be agreed prior to the submission of this local plan.</p> <p>9. We recognise that this may be challenging but it is necessary to ensure that the development needs of tightly bounded local authorities such as Crawley have their needs met elsewhere. Without the necessary agreement not only will the additional unmet needs identified through this local plan not be addressed but there is no guarantee that those needs agreed to be delivered elsewhere will not be delivered. It is therefore essential that a new statement common ground is agreed not only between Crawley, Horsham, and Mid Sussex but also other neighbouring authorities such as Mole Valley and Reigate and Banstead setting out how Crawley's growing unmet housing need will, in accordance with paragraph 11 and 60 of the NPPF, be met in full by its neighbours.</p> <p>Suggested Modifications:</p>
REP/143	CPRE Sussex	H1	<p>SUMMARY</p> <p>CPRE Sussex considers that Strategic Policy H1: Housing Provision is unsound.</p> <p>i. By means of the Standard Method formula the Draft Local Plan identifies a minimum housing need for the plan period of 12,080 dwellings, of which because of severe land-supply constraints only 5,030 (41,64%) can be accommodated within the borough.</p> <p>ii. The draft plan assumes that under the duty to cooperate the resultant unmet need of 7,050 dwellings can and will be accommodated by other local authorities, primarily Horsham and Mid Sussex.</p> <p>iii. Whether the intended recipients have the capacity within their environmental and infrastructure constraints to accommodate all the 7,050 dwellings, as well as their own substantial Standard Method housing needs, is assumed, not considered by the draft plan.</p> <p>iv. Usage of the Standard Method formula is not mandatory. Therefore, to enable the Duty to Cooperate to be fulfilled sustainably, and to ensure a sustainable future for their communities, whether and how many of the 7,050 new dwellings can/could be accommodated by the intended recipients should be determined in consultation with them. Environmental and infrastructure constraints, including the requirement for development to achieve Water Neutrality in Horsham District and much of Crawley Borough, need to be considered.</p>

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			<p>v. Crawley's unmet housing need should be adjusted accordingly.</p> <p>EXPLANATION</p> <p>1. The Draft Local Plan identifies a minimum housing need for the plan period 2024-2040, determined by means of the Standard Method formula, of 12,080 dwellings (paragraph 12.8).</p> <p>1.2 Because of Crawley's exceptional land supply constraints, the plan 'makes provision for the development of a minimum of 5,030 net dwellings in the borough', therefore provision for only 41.64% of its Standard Method calculated need.</p> <p>1.3 Crawley's remaining 7,050 (58.36%) dwellings '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)' (paragraph 12.39).</p> <p>2. The draft plan (paragraph 12.39) indicates that whether the resultant 7,050 (58.36%) unmet housing need can be accommodated by the intended recipients, primarily Horsham and Mid Sussex, within their environmental and infrastructure constraints, has yet to be determined and agreed by those authorities.</p> <p>3. Furthermore, having to accommodate the greater part of Crawley's huge Standard Method derived unmet need as well as their own substantial Standard-Method determined targets (acknowledged by Crawley's draft plan, paragraph 12.39) would most certainly render both Horsham and Mid Sussex District Councils vulnerable to Housing Delivery Test failure, and put at substantial risk their ability to meet 5-year housing land supply requirements.</p> <p>3.1 In which event developers would seek permissions at Appeal if refused, to develop sites not allocated in their local authorities' local plans.</p> <p>4. This is of considerable consequence because although councils allocate sites in local plans with the capacity to accommodate housebuilding targets, they have no direct control over housing delivery rates, but are nevertheless penalized when developers underdeliver against local plan targets.</p> <p>5. Developers/housebuilders decide build-rates and they will not build more houses than can be sold at an acceptable-to-them profit. In the event of reducing sales, as in an economic downturn, they will adjust completion rates downwards, resulting in undersupply against targets, as happened in the aftermath of the credit crunch of 2007/08.</p> <p>5.1 A further 'credit crunch' is now emerging, adding to uncertainty about the UK's economy and future growth.</p>

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			<p>6. Note that Chichester District Council is also seeking to export its unmet need to neighbouring LPAs, including Horsham District. Doubtless Adur and Worthing, and Brighton and Hove will do same, and Mid Sussex may well be in the frame for some of Brighton and Hove's unmet needs too.</p> <p>7. Build-rates might also be constrained by the requirement to achieve Water Neutrality.</p> <p>7.1 The 'Sussex North Water Neutrality Study: Part C – Mitigation Strategy Final Report', November 2022, advises that "Water neutrality is required as long as there is potential for an adverse effect on the sensitive habitats in the Arun Valley. In practice this means it is required until Southern Water can provide an alternative water source to replace groundwater abstraction at Pulborough" (page x). And that "Should insufficient offsetting be available in a given year (as a sum of the contribution from the Scheme and from SW's water demand reduction activities) it may be necessary to restrict growth in the following year by way of Grampian Conditions in order to maintain neutrality" (paragraph 53).</p> <p>7.2 The 'Crawley Borough Council Local Plan Review Sustainability Appraisal/Strategic Environmental Assessment Draft Report. For the Submission Local Plan May 2023', states that "Offsetting must be in place before water demand is generated, for instance before new houses are occupied. If it is not possible to provide sufficient offsetting up front, either because it cannot be delivered fast enough, or there is not enough available offsetting to meet demand, this will restrict the amount of growth that can go ahead". And that "The more off-setting is needed, the more difficult it becomes to achieve water neutrality, due to the finite options available within the water resource zone" (paragraph A27). Usage of the Standard Method formula is not mandatory</p> <p>8. The Government's 'Guidance Housing and economic needs assessment guides councils in how to assess their housing needs' advises that the use of the Standard Method is not mandatory, 'if it is felt that circumstances warrant an alternative approach but authorities can expect this to be scrutinised more closely at examination' with the caveat that 'There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances'.</p> <p>(Paragraph: 003 Reference ID: 2a-003-20190220. Revision date: 20 02 2019)</p> <p>8.1 Crawley's land supply constraints are exceptional, as is acknowledged by the draft plan (paragraph 2'3, see also 1.32, 3.3, 12.11, 12.34), and in consequence of those constraints 7,050 (58.36%) of the 12,080 Standard Method determined target will have to be accommodated by other LPAs, primarily Horsham and Mid Sussex, in addition to their Standard-Method determined housing need.</p> <p>8.2 An alternative approach is warranted.</p>

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			<p>CONCLUSION</p> <p>9. Usage of the Standard Method formula is not mandatory, and an alternative approach is warranted. Therefore, to enable the Duty to Cooperate to be fulfilled sustainably, and to ensure a sustainable future for their communities, whether and how many of the 7,050 new dwellings can/could be accommodated by the intended recipients should be determined in consultation with them. Environmental and infrastructure constraints, including the requirement for development in Horsham District and much of Crawley Borough to achieve Water Neutrality need to be considered.</p> <p>9.1 Crawley's unmet housing need can then be adjusted accordingly.</p> <p>Suggested Modifications:</p> <p>1 Crawley Borough's land supply constraints are exceptional, as is acknowledged by the draft plan (paragraph 2.3), and in consequence of those constraints 7,050 (58.36% of the 12,080) will have to be accommodated by other LPAs, primarily Horsham and Mid Sussex, in addition to their Standard-Method determined housing need.</p> <p>2. Usage of the Standard Method formula is not mandatory, and an alternative approach is warranted. Therefore, to enable the Duty to Cooperate to be fulfilled sustainably, and to ensure a sustainable future for their communities, whether and how many of the 7,050 new dwellings can/could be accommodated by the intended recipients should be determined in consultation with them. Environmental and infrastructure constraints, including the requirement for development in Horsham District and much of Crawley Borough to achieve Water Neutrality need to be considered.</p> <p>3. Crawley's unmet housing need can then be adjusted accordingly.</p>
REP/152	Save West of Ifield Campaign	H1 12.34	<p>The West of Ifield site(s) are adjacent to the Local Green Space of Ifield Brook Meadows and yet initial proposals from potential 'developer' Homes England indicate that pedestrian and cycle paths would be installed across this site. So it is not clear whether the Local Plan policy would prevent this or not?</p> <p>In the event of it not being permissible then the 15 minute neighbourhood concept becomes stressed as routings for walkers, wheelers and cyclists would have to be less direct at best. In addition, the positioning of these paths/walkways does not intersect with any existing network in the Ifield area apart from footpaths. The available footpaths are alongside Rusper Road and experience high traffic volumes and excessive speed.</p> <p>The Local plan policy should explicitly require deliver of significant upgrades to these facilities and the installation of LTN1/20 compatible cycle routes across Ifield and adjacent areas before any development takes place.</p> <p>Suggested Modifications:</p>

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REP/159	Wealden District Council	H1	<p>Wealden District Council Response to Crawley Borough Submission draft Local Plan 2024 – 2040 (Regulation 19)</p> <p>Thank you for your invitation to make a representation on the Crawley Borough Council Local Plan Consultation Draft (Spring 2023) under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended that has been published for a six-week period between Tuesday 9 May until Tuesday 20 June 2023.</p> <p>The officer comments below have been endorsed by the Cabinet Member for Planning and Development.</p> <p>Strategic Housing Matters</p> <p>We note that the draft Crawley Borough Council Local Plan sets out a local housing need figure calculated via the ‘standard method’ under the National Planning Policy Framework (NPPF) of 755 dwellings per annum (dpa) equating to 12,080 homes over the Local Plan period (2024-2040). The draft Crawley Borough Council Local Plan at Strategic Policy H1: Housing Provision, identifies housing sites to deliver a minimum of 5,030 (net) dwellings in the administrative boundary of the borough (this equates to 42% of its housing need), meaning there will be an unmet housing need of approximately 7,050 dwellings, arising from Crawley over the Plan period. The policy goes on to state that: ‘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’.</p> <p>At this stage, it is not clear from the draft Crawley Borough Council Local Plan as to how it may address this issue of unmet housing need and how any identified unmet housing needs might be met across the wider sub-region. This issue is defined clearly within paragraph 26 of the NPPF and states that joint working should help determine whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.</p> <p>Paragraphs 12.17 to 12.23 of the draft Crawley Borough Council Local Plan does outline potential key considerations for urban extensions at Crawley and the criteria for when such extensions would be supported. It is noted that such extensions will likely be outside of Crawley Borough Council (CBC) administrative area and will therefore be subject to further discussion with neighbouring local planning authorities, particularly Horsham District Council and Mid Sussex District Council who also form part of the Northern West Sussex Housing Market Area (HMA).</p> <p>WDC supports Strategic Policy H1: Housing Provision in that it confirms that the Council will continue to work closely with its ‘neighbouring authorities’, particularly those that form the Northern West Sussex HMA, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this</p>

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			<p>need in sustainable locations, including urban extensions to Crawley. WDC agrees that this is likely to be the most sustainable and appropriate option to meet this unmet housing need, given the services and facilities in the town, as well as sustainable modes of transport (including rail) that exist within the urban area.</p> <p>However, on the 14 April 2023, CBC did send a letter to WDC that set out a formal request as to whether WDC could accommodate some, or all of CBCs unmet housing needs, which amounts to 7,050 dwellings over the proposed Plan period (2024 – 2040) as outlined within draft Crawley Borough Council Local Plan under Strategic Policy H1: Housing Provision. WDC has responded to this letter in full, which is submitted alongside this formal response to the Regulation 19 consultation, but the following issues have been identified by WDC as factors as to why the local planning authority cannot meet the unmet housing needs of CBC at this stage.</p> <p>Housing Market Area (HMA) The latest Local Housing Needs Assessment (LHNA)¹ for Wealden concludes that Wealden District is overlapped by a number of different HMAs, which cross and fall within the district boundary in several locations. In terms of the LHNA conclusions, it is only suggested that a small, predominantly rural part of Wealden (incorporating Forest Row) to the northwest of the district overlaps with the Northern West Sussex HMA and this HMA only incorporates 6% of Wealden’s own population or around 2% of the overall HMA population.</p> <p>The latest information on the HMA for Crawley Borough Council was identified in the Northern West Sussex Strategic Housing Market Assessment (November, 2019)² document and confirms that evidence continues to support the definition of a Northern West Sussex HMA which is comprised, as a best fit to local authority boundaries, of Crawley, Horsham and Mid Sussex. It is recognised however that there is some evidence of an overlap with other local authorities, albeit Wealden is not specifically defined in this study, and this more relates to Surrey authorities to the north and the Coastal West Sussex HMA (that incorporates parts of Lewes District and Mid Sussex District) to the south.</p> <p>Given the above, the evidence shows a limited interaction between Wealden District and Crawley Borough in terms of those linkages. In addition, the administrative boundary of CBC is not shared with that of WDC and it is considered that the linkages shown in Wealden’s LHNA with the Northern West Sussex HMA are likely to stem from Mid Sussex District (particularly, East Grinstead) rather than Crawley.</p> <p>As noted above, the overlap with Northern West Sussex HMA in Wealden is limited to a rural area that incorporates Forest Row, and whilst not wishing to pre-empt the Local Plan process, it is considered that there will likely be only very limited opportunities for further growth, given the constraints in that location that includes the High Weald AONB, flood risk and the Ashdown Forest SPA. The growth of other</p>

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			<p>sustainable settlements within the south of Wealden District, such as Uckfield, Hailsham or other settlements on the outskirts of Eastbourne all fall outside of the Northern West Sussex HMA. Given this, any growth in these locations are unlikely to fulfil the housing needs of CBC specifically.</p> <p>Sustainability of New Development Paragraph 73 of the NPPF (July, 2021) states that ‘the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)’. Paragraph 105 of the NPPF (July, 2021) states that ‘significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes’. Given our comments earlier regarding the constraints of Forest Row (which is located within the Northern West Sussex HMA), it is considered, on sustainability grounds alone, it would be better to address unmet development needs of CBC within and/or adjacent to large regional centres such as Crawley, where jobs, sustainable transport links and retail are largely located. This would be in line with national planning policy on this matter. Substantial development away from these areas, particularly within the High Weald AONB designation, in a rural area, would be considerably less sustainable and may exacerbate existing outcommuting patterns from Wealden District.</p> <p>Infrastructure WDC, as part of its local plan process will also need to consider its existing infrastructure constraints and to test how and where we can accommodate growth, including the strategic road network. It is not yet known whether WDCs own development needs can be met through its existing infrastructure and/or what new infrastructure is required to deliver growth in the longer term.</p> <p>As part of our local plan production, we are working with East Sussex County Council and other local authority partners (Eastbourne, Rother, the South Downs National Park Authority, Lewes and Hastings) to test growth options, specifically in relation to existing road networks. A countywide transport model is currently being devised for this purpose. We will also need to consider as part of our growth strategy whether an offline A27 is required to support growth. RIS2 was published in March 2020 and identifies further work that will be undertaken in order to progress developing proposals for the A27 between Lewes and Polegate as a potential pipeline scheme for construction between 2025 and 2030. We will need further clarification as to the potential of this scheme in order to inform housing delivery and options for delivery. In the meantime, we are waiting to hear the outcome of a Major Road Network (MRN) bid to support the delivery of a number of junction improvements for the A22/A27 to facilitate growth. We hope to know more on this shortly.</p>

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			<p>Conclusion</p> <p>Turning to the specific request, WDC is clear that given the geography of the Northern West Sussex HMA and the physical distance from Crawley, the options for WDC to take some or all of this unmet housing need would be less sustainable than the alternative of delivering this growth either within the CBC area or its adjoining authorities. Put simply, any solution would either be to build in a rural part of Wealden District in an unsustainable location, within the High Weald AONB, or to seek to build outside the small, shared element of the HMA, thereby not meeting the needs of CBC residents.</p> <p>Suggested Modifications:</p>
REP/160	Chichester District Council	H1	<p>Crawley Local Plan Review - Regulation 19 and response to Duty to Cooperate request</p> <p>Thank you for consulting Chichester District Council (CDC) on the Regulation 19 Crawley Borough Submission draft Local Plan 2024 - 2040, published 9 May 2023. This letter sets out our formal response to the consultation, and our formal response to your request (14 April 2023) that CDC consider assisting Crawley Borough Council (CBC) in addressing unmet development needs under the Duty to Cooperate provisions of 7,050 dwellings and particular housing types needed to meet the needs of specific communities.</p> <p>In our 7 March 2021 response to the January 2021 Regulation 19 consultation, we:</p> <ul style="list-style-type: none"> • welcomed the continued recognition given to the ongoing work of the West Sussex and Greater Brighton Strategic Planning Board in addressing cross-boundary and sub-regional matters to ensure that the strategic development and infrastructure needs of the overall area are met as far as possible within the context of the provision of the National Planning Policy Framework (NPPF) (as set out in Topic Paper 1: Unmet needs and Duty to Cooperate). • noted the position of Crawley Borough Council (CBC) as being unable to meet its OAHN and that CBC needs to look to other authorities in the wider area. • recognised that there was a significant shortfall over the plan period of 6,680 dwellings, as a result of 5,320 dwellings being the maximum which could sustainably be delivered at that time. • set out that we would encourage CBC to further investigate all potential opportunities to increase housing provision within its plan area to ensure that no stone is left unturned by the Council in maximising the potential of the existing urban areas to regenerate and be intensified, where appropriate to do so. • committed to continuing to engage constructively, actively and on an ongoing basis with other local authorities and organisations to address sub-regional issues, including through the West Sussex and Greater Brighton Strategic Planning Board. <p>In response to the Regulation 19 Crawley Borough Submission draft Local Plan 2024 - 2040, published 9 May 2023, CDC:</p>

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			<ul style="list-style-type: none"> • understands that the objectively assessed housing needs figure for CBC is 12,080 dwellings (755 dpa) and that the draft Local Plan provides for 5,030 dwellings (314dpa), which results in an unmet need of 7,050 dwellings (as set out in Table 1 of Topic Paper 1: Unmet Needs and Duty to Cooperate, May 2023). This also results in an unmet affordable housing need of 9,812 dwellings (613 dpa) and an unquantified potential unmet need for self and custom build housing. recognises the additional work that has been carried out to seek additional sites and to reassess sites as well as density levels. • supports the recognition in Policy H1 and paragraph 12.38 that the supply figure is a minimum. • supports paragraph 1.31 which recognises the ongoing role of the West Sussex and Greater Brighton Strategic Planning Board in discussing strategic issues (including the preparation of the Local Strategic Statement) and the partnership working to resolve the water supply constraint to development within the Sussex North Water Resource Zone. • supports the approach to housing provision set out in Policy H1 and the commitment to continue to work closely with neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area to explore opportunities for meeting unmet need. CDC agree that the Northern West Sussex Housing Market Area authorities are best placed to fulfil this role. • supports the acknowledgement in paragraphs 12.17 – 12.23 of the draft Local Plan that, in the longer term, well planned urban extensions could form an important way to meet Crawley’s unmet housing needs, through informing discussions with neighbouring authorities within the Northern West Sussex Housing Market Area. <p>In response to your Duty to Cooperate request dated 14 April 2023:</p> <ul style="list-style-type: none"> • CDC recently published our Proposed Submission Local Plan 2021 – 2039 for Regulation 19 consultation. The position set out in the Plan is that following the completion of evidence work, we will be providing a supply of 575dpa; a total of 10,350 dwellings over the plan period. This is below our objectively assessed need figure of 638dpa due to the significant constraint of A27 junction capacity. Therefore, CDC are also generating an unmet housing need which we have been engaging with neighbouring authorities on under the Duty to Cooperate. This also means that we are unable to assist the South Downs National Park Authority with their unmet needs (arising from the part of the SDNP within Chichester District) as was previously proposed in the Preferred Approach draft of the Local Plan (2018). • As a result of not being able to meet our own needs, we cannot agree to meet any unmet needs arising from Crawley Borough currently. If we were able to take unmet need, we would first have to consider assisting authority areas more directly related to the Chichester Plan area, particularly the South Downs National Park Authority. • Similarly, like CBC, CDC will have an unmet affordable housing need over the plan period, compounded by pressures on the viability, which restrict the affordable housing thresholds which can be required in

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			<p>relation to new development. Consequently, CDC is not able to accommodate any unmet affordable housing need from neighbouring authorities.</p> <p>In relation to self and custom build, CDC is proposing to make provision for those on its register with a preference to live in the plan area via requirements to provide plots on the strategic housing allocations. However, these will be primarily around Chichester and hence unlikely to be suitable for self-builders on CBC register owing to the geographical separation. There is the possibility that some opportunities will become available via neighbourhood planning in the northern part of the CDC plan area, though it is presumed that this will be focused on local needs, and hence it is presumed that there will be no scope to formally meet the needs from elsewhere via this process. Nevertheless, there may be the potential for some plots to become available on an ad hoc basis, but it is unlikely that the CDC can commit to accommodating a specific level of self and custom build need from CBC.</p> <p>Suggested Modifications:</p>
REP/162	Judith Ashton Associates	H1	<p>I write with reference to the above. As you know I act for Wates Developments Limited who are promoting the development of the land at Crabbet Park which lies within Mid Sussex, but adjacent to the borough boundary with Crawley, to the south of Copthorne Road, north of Turners Hill Road, east of Kits Brook and west the M23.</p> <p>Having regard to the above, we note that policy H1 advises that: <i>'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.'</i></p> <p>We also note the content of paras 12.39 and 12.40 in terms of the constrained nature of Crawley's land supply, and scale of the unmet need, and associated need to liaise through the DTC with the other authorities within the Northern West Sussex HMA (including MSDC) about their ability to help meet some of Crawley's unmet need; and continued need to explore the opportunities for urban extensions immediately adjoining Crawley's borough boundaries, taking into account the issues set out in paragraphs 12.17-12.23 of the draft plan. We further note the content of paras 12.18 – 12.23 of the draft plan in terms of CBC's aspirations when it comes to any future urban extensions.</p> <p>To this end we would like to say that Wates support in general the overall strategy advocated towards potential urban extensions to Crawley in policy H1 and paras 12.17 – 12.23, 12.39 and 12.40. In the context of the above you will be aware that policy DPSC3 of the Mid Sussex Reg 18 Plan that was consulted on last year looks to allocate land at Crabbet Park for a mixed-use development which would provide for:</p>

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			<ul style="list-style-type: none"> • Approximately 2,300 new homes, 1,500 of which are within the Plan Period (to 2039); including provision of extra care housing. • Employment land to support local jobs. • An all-through school with 2FE at Primary and 4FE at Secondary, with or without Sixth Form. • Neighbourhood centre with community facilities, including self-service library, healthcare provision extra care housing provision and transport hub nearby, as well as associated leisure and play space provision. • Improved linkages to the cycling and walking network to improve sustainable transport routes to Three Bridges train station, Crawley Town Centre and areas of employment centre including links to the Worth Way. • Wastewater infrastructure. <p>Policy DPSC3 also looked to provide for financial contributions towards the provision of sport facilities, community buildings, emergency services and healthcare; to mitigation the impact of the development on the AONB which lies to the south of the site and required adherence to the General Principles for Site Allocations set out in policy DPH4 of the MSDC Reg 18 Plan.</p> <p>Having regard to the policy position being promoted by Mid Sussex and the Vision Document produced on behalf of Wates, which is enclosed for information, we believe the proposed development of Crabbet Park will comply with the aspirations set out in paras 12.17 – 12.22, 12.39 and 12.40 of the Crawley Submission Draft Plan, and the criteria set out in para 12.23 of the Submission Draft Plan; and would like to assure the council of our desire to work with them and Mid Sussex in bring this proposed strategic allocating forward. To this end we would, having regard to meetings we have already had with officers of CBC reiterate Wates commitment to:</p> <ul style="list-style-type: none"> > Creating a well-planned urban extension which provides a comprehensive, sustainable new neighbourhood with local facilities and services that meet the day-to-day needs of residents. > A development that relates well to the landscape character of the area and protects the setting of Crawley's neighbourhoods. > A development that is laid out and designed to be reflective of its location and will not harm to the setting of the master planned New Town nor result in urban sprawl or unplanned merging of settlements. Indeed, the whole masterplan ethos is based upon a detailed assessment of the landscape structure, form and character of the area, which is as you will be aware, is characterised by woodlands, enclosed country lanes and hedgerow corridors which provide contained views and a sense of enclosure. > Working with officers of MSDC to ensure any future development is a blended mix of MSDC and Crawley's housing needs, in particular the affordable housing needs, in terms of housing mix, type, and tenure. And that it also provides an opportunity to meet unmet employment needs, and infrastructure

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			<p>requirements such as education and health, as well as the extent to which it could provide strategic leisure facilities serving the wider area.</p> <ul style="list-style-type: none"> ➤ Reviewing the infrastructure impacts of any future development cumulatively, including impacts upon existing facilities in Crawley and the timing of the delivery of mitigation measures. ➤ Actively encouraging and maximising the use of sustainable transport modes and ensuring that linkages are maintained and enhanced to and from Crawley's neighbourhoods thus providing sustainable routes into Crawley for future residents and ensuring that existing residents of Crawley have enhanced access to the countryside beyond the town. ➤ Ensuring the design of the urban form and infrastructure is of a high quality which is not prominent in the existing landscape setting. ➤ Ensuring that areas of ancient woodland, veteran trees and TPO trees are respected and where the loss of existing trees is unavoidable, appropriate replacement trees are be provided. ➤ The development incorporates strategic Green Infrastructure throughout, providing ecological linkages and biodiversity net gains. ➤ The development is designed to exemplar sustainability standards. <p>Whilst we will leave the council to liaise directly with MSDC about the need for a Joint Area Action Plan and Area Wide Design Assessment, we would suggest that in addition to completing SoCG with those authorities in the Northern West Sussex HMA to address the issue of how CBC's unmet housing need is to be addressed, CBC look to enter into a tripartite agreement with MSDC and Wates about the merits of Crabbet Park, and its potential role on meeting the housing needs of the area/ or individual SoCG with MSDC and Wates to address this point. To this end we can confirm that Wates are happy to work with CBC and MSDC on any such SoCG/ tripartite agreement.</p> <p>Overall, we believe the proposed allocation and ultimate development of the land at Crabbet Park whilst within Mid Sussex will do much to help address the local housing need and hope that we can work with CBC to ensure that they can support said allocation/ development having regard to the aspirations set out in policy H1, and paras 12.17 – 12.23, 12.39 and 12.40 of the Crawley Submission Draft Plan</p> <p>Suggested Modifications:</p>
REP/168	Network Rail	Local Plan Housing – Unmet Needs	<p>Network Rail have concerns over Crawley seeking to meet 42% of its total housing need and the potential impact of unmet need on neighbouring authorities. Crawley's location within the Gatwick Diamond and the improvements to Gatwick Airport Station, and possible further extensions to Gatwick Airport, places the Borough as a central tenement of both the local and national economy. The location of Crawley means that it should be contributing significantly to meeting housing need with the Diamond. The impacts of unmet need on neighbouring authorities places huge stresses on infrastructure provision and could make the</p>

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			<p>deliverability of housing need (plus unmet need) especially challenging. These impacts on infrastructure, especially the rail network, requires the identification of funding opportunities from developer contributions. In undertaking the Local Plan Review, Network Rail does not believe that these impacts have been fully assessed or that a suitable spatial strategy, that doesn't rely on neighbouring authorities meeting unmet needs, has not been fully considered. Without meeting need, and capturing developer contributions from this to improve the infrastructure, Crawley places itself in a position whereby the spatial strategy is not sound and failing to fully secure improvements for the Borough.</p> <p>Suggested Modifications:</p>
REP/170	Slaugham Parish Council	Unmet Housing Needs	<p>Please find below Slaugham Parish Council's response to the Crawley Borough Local Plan Consultation.</p> <p>Slaugham Parish Council (SPC) are situated in the District of Mid Sussex in an Area of Outstanding Natural Beauty.</p> <p>The Slaugham Neighbourhood Plan was made in 2019 and is up to date. https://www.midsussex.gov.uk/media/4465/slaugham-neighbourhood-plan.pdf</p> <p>The District Council advised SPC that the required minimum provision at Pease Pottage (<i>Slaugham Parish</i>) is significantly greater than other settlements within Category 3 due to the strategic allocation for 600 homes, in addition to the housing already taken within the Parish during the plan period. This meant that the other settlements within the Parish (Handcross, Slaugham and Warninglid) will not be required to identify further growth. This site is meeting unmet need of Crawley Borough along with developer infrastructure monies allocated to assets such as K2, so outside of the District/Parish that took the development.</p> <p>As part of the preparation of the SNP, and prior to the adoption of the MSDP, SPC undertook a Housing Needs Consideration Assessment. This applied different methodologies to calculate housing need, reliant upon data from a variety of sources. The Assessment provided a range of housing figures for growth of the Parish over the Plan period. Noting the results of the Assessment, and the position of the District housing need, which at the time was following an upward trajectory, SPC resolved to consider whether further, modest growth should be facilitated in the SNP.</p> <p>Having regard to the areas already mentioned, the relative scale and sustainability of the Parish's four settlements, the then emerging district plan and housing requirement pressure from central government, alongside the aspirations set out in the SNP the Parish Council resolved to positively make housing provision for further growth and that this is facilitated in the SNP to a small scale site in Handcross.</p>

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			<p>With this evidence the additional measures taken by SPC to prevent unwanted spatial development they have gone beyond what was required to safeguard the Parish.</p> <p>We there cannot take any further housing requests for any future unmet need.</p> <p>Suggested Modifications:</p>
REP/005 (2023)	Thames Water	H2	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future infrastructure.</p> <p>The attached table provides Thames Water's site specific comments from desktop assessments on sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites. We are also engaged in the Gatwick water cycle study. More detailed comments will follow / supersede these in the Gatwick water cycle study.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated <p>As recognised at Paragraph 8.10 of the draft Local Plan, it should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution. Waste-water/Sewage Treatment Works upgrades take longer to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years to plan, design, obtain approvals and build.</p> <p>In relation to Gatwick Airport, Thames Water have had a number of constructive meetings with Gatwick Airport Company. Work to understand what network and process upgrades will be required to continue to serve the single runway operation have been included in our assumption to serve Crawley's local plan along with housing and other employment proposals. We have however not considered the impact of a second runway at Gatwick and discussion continue with the owners of the airport on this matter.</p> <p>Suggested Modifications: Need to make reference to any site specific sewerage/wastewater infrastructure concerns</p>
REP/011 (2023)	National Highways	H2	<p>The policy should require the preparation of a vision for each housing site which sets the outcome the communities want to achieve, supporting sustainable transport and reducing the need to travel, especially by car. The vision can fit within a masterplan, which sets out how these objectives can be achieved through</p>

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			<p>layout and design. This is needed to comply with the requirements of Circular 1/2022 and to help reduce a reliance on the SRN for local journeys.</p> <p>Suggested Modifications:</p>
REP/033 (2023)	Horsham District Council	H2	<p>Strategic Policy H2: Key Housing Sites</p> <p>We support this policy in principle, but consider it is not completely justified as stands. As set out in our comments to earlier policies (and in particular Policy H1), further evidence is required to transparently demonstrate that site capacities have been optimised, thereby justifying the overall number of dwellings proposed. The following paragraphs elaborate on why this view has been reached.</p> <p>It is unclear as stands as to why the Compact Residential Development Study (CRDS) only provides more detailed analysis of one sample site (site 16) by way of supporting the SHLAA assessments (the table following paragraph 6.12).</p> <p>Moreover, the method of analysis does clearly relate to the assessed 'net dwellings total' (or net site capacity) presented in the SHLAA. Our reading of the SHLAA proformas instead suggests that assessments of net site capacities have in many cases been based on history of planning applications, pre-applications or masterplans. This is not unreasonable, but in a context where the Local Plan is proposing to provide well below assessed need, it is not clear from the assessments whether there are other opportunities to maximise site capacities and if so how they have been explored. This is necessary to be clear why the assessed capacities are considered optimal and cannot be pushed up further.</p> <p>We acknowledge and support that some proposed allocations have been reassessed as having a higher site capacity than before and this is welcomed. Totals have generally been revised arithmetically to meet the bottom of the density range in Policy CL4. However, we would question why the bottom of the range appears to have been assumed, rather than the CRDS recommendation triggering a re-evaluation of opportunities to increase the number of homes above the Policy CL4 minimum requirement.</p> <p>Suggested Modifications:</p> <p>Change sought: Where net site capacities have been changed to meet the bottom end of the relevant density range, the SHLAA assessment proformas should explain how the site evaluation has arrived at the capacity estimate. This should consider whether a greater number than the minimum within the relevant density range may be achievable, and if not, explain why a higher number is not feasible. Such further work may increase some housing site capacities which may in turn reduce unmet housing need within the wider HMA.</p>

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REP/050 (2023)	Homes England	H2	<p>Tinsley Lane Local Plan Representation <i>Tinsley Lane, Three Bridges (deliverable) 120 dwellings, mixed use recreation/residential. Development of this site must include:</i></p> <ul style="list-style-type: none"> <i>i. the replacement of Oakwood Football Club;</i> <i>ii. senior football pitch and facilities;</i> <i>iii. a junior 3G football pitch;</i> <i>iv. community use arrangements for the sports pitch facilities;</i> <i>v. enhancement and management for public access of Summersvere Woods;</i> <i>vi. on-site publicly accessible play space and amenity greenspace;</i> <i>vii. consideration should be given to the provision of allotments.</i> <p><i>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.</i> <i>Full details of the requirements relating to this site will be set out in a Tinsley Lane Development Brief.</i></p> <p>The proposed Plan retains Tinsley Lane as a site allocation which Homes England supports. The policy requirements remain but with the removal of 'consideration of' in reference to allotments, strengthening the requirement. Homes England requests reference to allotments is removed, or the policy reverts back to 'consideration should be given to the provision of allotments.'</p> <p>Reasons for this request relate to both delivery and viability concerns as set out below.</p> <p>Delivery An outline planning application was submitted in 2021 (reference: CR/2021/0355/OUT). The application was due to go to Committee and the Officers Report had been prepared with a recommendation for approval when Natural England paused the determination of all applications in the Borough until a strategic water neutrality solution was put forward. The applicant is in the process of undertaking the necessary calculations and analysis to prepare a Water Neutrality Statement which will enable the application to go to Committee this Autumn.</p> <p>The planning statement for the 2021 application explained that allotment space had been considered but was not deemed feasible due to the following reasons:</p> <ul style="list-style-type: none"> - the scale of the open space, the woodland and sports facilities being proposed at this site - a unique design approach which provides a continuous housing 'edge' which shields new and existing residents from noise from the Goods Yard/ Manor Royal. - requirement for SuDS attenuation areas due to poor drainage. - a 15m woodland buffer from the Ancient Woodland. - recent addition of TPO notifications for a large number of trees and hedgerows

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			<ul style="list-style-type: none"> - policy requiring delivery of 1 tree per home - setback from the Crawley Avenue Air Quality Management Area <p>The illustrative masterplan for the OPA instead includes more than double the quantum of open space provision as set out in the total open space requirements; including provision of play space, amenity green space, a woodland buffer area and structural landscaping along with the SuDs Zones. In addition, a Senior artificial pitch is proposed whereas the policy requires only a junior artificial pitch enhancing the usage of the sports provision. Moreover, a demand for allotments has not been identified during the pre-application consultation.</p> <p>Viability</p> <p>The allocation for Land East of Tinsley Lane requires the provision of significant infrastructure for a relatively small scheme of 120 units including:</p> <ul style="list-style-type: none"> - 40% affordable housing - wider S106 contributions and CIL - provision of a new and significantly improved football club and associated pitches with a community use agreement. - new amenity and play space - opening up of the woodland for community access - improvements to Birch Lea - water neutrality solution and financial contribution as per Policy SDC4 <p>The proposed plan also introduces a number of additional requirements which the development will be required to comply with if adopted in its current form. This includes requirements such as enhanced sustainability and energy requirements; increased requirements for accessible and adaptable dwellings along with self and custom build homes.</p> <p>Viability will be compromised with the addition of allotments. As an Agency we are reluctant to 'water down' other contributions such as affordable housing.</p> <p>Conclusion</p> <p>The 2021 submitted application is therefore currently compliant with the adopted local plan and Development Brief in regard to allotment requirements but would become discordant with the proposed amendment which removes the allowance for 'consideration' to be given to the allotments rather than a strict requirement. It is clear from the information submitted for the site to date that the allotment provision has not been possible and therefore this amendment would jeopardise the delivery of the scheme.</p>

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			<p>Suggested Modifications: The allocation policy in its current adopted form along with both the existing and emerging wider policies require significant community infrastructure to be provided on site. The addition of allotments will impact on the deliverability and viability of the scheme. It is therefore requested that the reference to allotments should be removed in its entirety or retained as per the existing wording.</p>
REP/060 (2023)	Savills on behalf on Bellway Homes	H2 – Steers Lane	<p>Technical Objection Bellway Homes are in general support of Policy H2 Key Housing Sites which sets out deliverable and developable sites in the borough. This facilitates residential development in the borough in order to deliver much needed housing and achieve the minimum housing targets. Land at Steers Lane which has planning permission for 185 homes through outline and reserved matters applications (CR/2018/0894/OUT and CR/2020/0548/ARM) is currently being implemented and support Crawley’s housing targets in a sustainable location.</p> <p>In addition, a resolution to grant planning permission has recently been made for Phase 2 of the Steers Lane development, under LPA reference: CR/2022/0055/FUL. The Phase 2 of development incorporates 60 dwellings. Policy H2 should be updated to highlight that Land at Steers Lane is a deliverable site that can accommodate up to 245 dwellings. This not only provides a more accurate and robust policy it also plays an improved role in achieving Crawley’s housing targets.</p> <p>Suggested Modifications: Updating the policy wording (<u>in red underlined</u>) as per the below would result in a more positively prepared, justified and effective policy in line with the (NPPF’s Paragraph 35 Tests of Soundness. Suggested policy wording update: “<i>Deliverable</i> ... • Land at Steers Lane, Forge Wood (185 <u>245</u> dwellings) (subject to implementation of outline planning permission of CR/2018/0894/OUT, <u>CR/2020/0548/ARM and CR/2022/0055/FUL</u> or any amendment thereof, and associated Reserved Matters approval(s)...”</p>
REP/087 (2023)	Woodland Trust	H2	<p>Policy H2: Key Housing Sites In line with policy GI2, and the NPPF para 180c, development which would result in the loss of ancient woodland, aged or veteran trees should not be permitted.</p> <p>We object to the allocation of land for housing that includes the following ancient semi-natural woodlands (ANSW):</p> <ul style="list-style-type: none"> • Black Corner Wood ASNW (Grid reference: TQ2996939934) • Black Corner Wood ASNW (Grid reference: TQ2980139854) • Black Corner Wood ASNW (Grid reference: TQ2971939604)

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			<ul style="list-style-type: none"> • Titchmeres Wood ASNW (Grid reference: TQ2957539239) • Forge Wood ASNW (Grid reference: TQ2964738891) • Unnamed ASNW at TQ2965338714 • Unnamed ASNW at TQ2984538749 • The Birches ASNW (Grid reference: TQ2921138575) • Tinslow Shaw / Mine Pit Wood ASNW (Grid reference: TQ2901638590) • Unnamed ASNW at TQ2900238628. <p>In addition, we are concerned about the proximity of the site allocations to</p> <ul style="list-style-type: none"> • Summersveres Wood (Grid reference: TQ2868538572) and to • Tilgate Forest & Lodge ASNW (Grid reference: TQ2704334553). <p>The Ancient Tree Inventory (ATI) for the area may be incomplete. We therefore recommend an exercise to complete the ATI (which lists ancient, veteran, and notable trees outside woods) across any sites allocated or proposed to be allocated for development, to comply with the requirements of the NPPF 2021 (paragraph 180c) for the protection of irreplaceable habitats.</p> <p>We recognise the intense pressure to identify and bring forward new sites for housing and employment uses. This pressure makes it even more important that vital protections for ancient woodland and veteran trees are upheld.</p> <p>We consider that this policy is not legally compliant or sound unless these areas of ancient woodland are excluded from any future development sites, with appropriate buffers specified, in line with para 14.23 of the draft plan.</p> <p>Suggested Modifications:</p> <p>The Ancient Tree Inventory (ATI) for the area may be incomplete. We therefore recommend an exercise to complete the ATI (which lists ancient, veteran, and notable trees outside woods) across any sites allocated or proposed to be allocated for development, to comply with the requirements of the NPPF 2021 (paragraph 180c) for the protection of irreplaceable habitats.</p> <p>We recognise the intense pressure to identify and bring forward new sites for housing and employment uses. This pressure makes it even more important that vital protections for ancient woodland and veteran trees are upheld.</p> <p>We consider that this policy is not legally compliant or sound unless these areas of ancient woodland are excluded from any future development sites, with appropriate buffers specified, in line with para 14.23 of the draft plan.</p>
REP/050 (2023)	Homes England	H2 – Tinsley Lane	Land East of Tinsley Lane is an allocated site in the existing Crawley Local Plan, under Policy H2: Key Housing Sites.

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			<p>The policy currently requires the following: Tinsley Lane, Three Bridges (deliverable) 120 dwellings, mixed use recreation/residential. Development of this site must include:</p> <ol style="list-style-type: none"> i. the replacement of Oakwood Football Club; ii. senior football pitch and facilities; iii. a junior 3G football pitch; iv. community use arrangements for the sports pitch facilities; v. enhancement and management for public access of Summersvere Woods; vi. on-site publicly accessible play space and amenity greenspace; vii. consideration should be given to the provision of allotments. <p>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 will be set out in a Tinsley Lane Development Brief.</p> <p>The proposed Plan retains Tinsley Lane as a site allocation which Homes England supports.</p> <p>The policy requirements remain but with the removal of “consideration” of in reference to allotments, strengthening the requirement.</p> <p>Homes England requests reference to allotments is removed, or the policy reverts back to consideration should be given to the provision of allotments. Reasons for this request relate to both delivery and viability concerns as set out below.</p> <p>Delivery</p> <p>An outline planning application was submitted in 2021 (reference: CR/2021/0355/OUT). The application was due to go to Committee and the Officers Report had been prepared with a recommendation for approval when Natural England paused the determination of all applications in the Borough until a strategic water neutrality solution was put forward. The applicant is in the process of undertaking the necessary calculations and analysis to prepare a Water Neutrality Statement which will enable the application to go to Committee this Autumn.</p> <p>The planning statement for the 2021 application explained that allotment space had been considered but was not deemed feasible due to the following reasons:</p> <ul style="list-style-type: none"> - the scale of the open space, the woodland and sports facilities being proposed at this site - a unique design approach which provides a continuous housing edge which shields new and existing residents from noise from the Goods Yard/ Manor Royal. - new and existing residents from noise from the Goods Yard/ Manor Royal. - requirement for SuDS attenuation areas due to poor drainage. - a 15m woodland buffer from the Ancient Woodland.

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			<ul style="list-style-type: none"> - recent addition of TPO notifications for a large number of trees and hedgerows - policy requiring delivery of 1 tree per home - setback from the Crawley Avenue Air Quality Management Area <p>The illustrative masterplan for the OPA instead includes more than double the quantum of open space provision as set out in the total open space requirements; including provision of play space, amenity green space, a woodland buffer area and structural landscaping along with the SuDs Zones.</p> <p>In addition a Senior artificial pitch is proposed whereas the policy requires only a junior artificial pitch enhancing the usage of the sports provision. Moreover, a demand for allotments has not been identified during the pre-application consultation.</p> <p>Viability The allocation for Land East of Tinsley Lane requires the provision of significant infrastructure for a relatively small scheme of 120 units including:</p> <ul style="list-style-type: none"> - 40% affordable housing - wider S106 contributions and CIL - provision of a new and significantly improved football club and associated pitches with a community use agreement. - new amenity and play space - opening up of the woodland for community access - improvements to Birch Lea - water neutrality solution and financial contribution as per Policy SDC4 <p>The proposed plan also introduces a number of additional requirements which the development will be required to comply with if adopted in its current form. This includes requirements such as enhanced sustainability and energy requirements; increased requirements for accessible and adaptable dwellings along with self and custom build homes.</p> <p>Viability will be compromised with the addition of allotments. As an Agency we are reluctant to “water down” other contributions such as affordable housing.</p> <p>Conclusion The 2021 submitted application is therefore currently compliant with the adopted local plan and Development Brief in regard to allotment requirements but would become discordant with the proposed amendment which removes the allowance for “consideration to be given to the allotments” rather than a strict requirement.</p>

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			<p>It is clear from the information submitted for the site to date that the allotment provision has not been possible and therefore this amendment would jeopardise the delivery of the scheme.</p> <p>The allocation policy in its current adopted form along with both the existing and emerging wider policies require significant community infrastructure to be provided on site. The addition of allotments will impact on the deliverability and viability of the scheme. It is therefore requested that the reference to allotments should be removed in its entirety or retained as per the existing wording.</p> <p>Suggested Modifications: Modification requested to Policy H2: Key Housing Site (Tinsley Lane vii): Homes England requests reference to allotments is removed, or the policy reverts back to “consideration should be given to the provision of allotments.”</p>
REP/062	Environment Agency	SHLAA H2	<p>Strategic Housing Assessment Land Availability Assessment</p> <p>Currently two sites identified for housing in Local Plan Policy H2 are partially at risk to flooding though it appears feasible that both these sites, Land Adjacent to Desmond Anderson and Land West of Balcombe Road/Street Hill, can be designed/developed in a sequential way to avoid built development in those areas at risk to flooding.</p> <p>Previous discussions have taken place on the flood risk at these sites.</p> <p>There are a few Larger Housing Sites with Planning Permission of September 2022, located in flood risk area. However, these sites have been reviewed and commented on at the planning stages by us, and we expect to see site specific Flood Risk Assessments from the site developer when these proposals moved ahead.</p> <p>Two sites with flood risk as a constraint, Furnace Green Community Centre (Site Reference 86) and Henty Close (Site Reference 14) are currently classified as Site that are suitable but currently undeliverable/undevelopable. It is commented that these be considered as windfall sites, though we would ask to be consulted on any development proposals should these sites come forward.</p> <p>Several sites, including Site References 65, 72, 73, 75, 76, 77, 78, 79 and 80 all have significant constraints on development posed by flooding. We welcome that all these sites are currently classified as being unsuitable for residential development and consider this an appropriate conclusion. Site References 94, 95 and 96 are partially constrained by flooding, and again welcome that these are not currently considered to be suitable for residential development. Should the stance on any of these sites change, we would wish to be consulted.</p> <p>Suggested Modifications:</p>

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REP/063	Persimmon Homes	H2 – Forge Wood Omission sites	<p>The Plan omits the five land parcels at Forge Wood from the key sites identified by policy H2. The Council have not provided sufficient justification to support this omission taking into account the advice provided by paragraph 2b(i) and (ii) of the NPPF.</p> <p>Suggested Modifications: The five land parcels at Forge Wood proposed by Persimmon Homes for development should be included in the list of key sites.</p>
REP/113 (2023)	Natural England	H2	<p>Policy H2: Key Housing Sites</p> <p>Our full comments regarding water neutrality are set out for policy SDC4 regarding Water Neutrality, however we do note that the following allocations fall within the Sussex North WRZ and as such should demonstrate water neutrality as appropriate:</p> <ul style="list-style-type: none"> • Zurich House (53 dwellings) • Former TSB site (59 dwellings) • Upper Floors, 7 – 13 The Broadway & 1 - 3 Queens Square, (25 dwellings) • Shaw House, Pegler Way, West Green (33 dwellings) • Longley House (121 dwellings) • Land Adjacent to Sutherland House (30 dwellings) • Land adjacent to Desmond Anderson (205 dwellings) • The Imperial (19 dwellings including a drinking establishment (A4 use) and two retail (A1 use) units). • Town Centre Key Opportunity Sites (1,500 net dwellings); comprising: Telford Place, Crawley Station and Car Parks, County Buildings, Land North of the Boulevard, Crawley College, Cross Keys and MOKA • Tinsley Lane (120 dwellings, mixed use recreation/residential). • Breezehurst Drive Playing Fields, (85 dwellings, mixed use recreation/residential) • Oakhurst Grange, Southgate (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 (residential Class C3 use for older people (60 dwellings) and/or residential rooms as Class C2 (Residential Home) use). <p>While policy G12 includes various provisions on ancient woodland we still note that various allocations are adjacent to or in close proximity with ancient woodlands and/or veteran trees. As such in line with the NPPF (paragraph 180), the goals and actions of the EIP and Natural England’s standing advice (available here) the following allocations will need to ensure that impacts to these irreplaceable habitats are avoided and that enhancements to these habitats are supported:</p> <ul style="list-style-type: none"> • Forge Wood Phase 4B (434 dwellings) • Land at Steers Lane (185 dwellings) • Land adjacent to Desmond Anderson (205 dwellings) • Land to the southeast of Heathy Farm (188 dwellings) • Tinsley Lane (120 dwellings, mixed use recreation/residential)


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			Suggested Modifications:
REP/136	Resident 52	H2 – Tinsley Lane	<p>The land of Oakwood Club & the 3 fields should be changed to Sports Fields. There is not enough Sports Fields & Football Pitches in Crawley with many being of the years. The need for more Leisure pitches. To change from housing to 3 Football Pitches for use of Oakwood Football Club. There is not enough football & leisure pitches in Crawley.</p> <p>Suggested Modifications: Change use of Oakwood from Housing to great space for football</p>
REP/139	Resident 54	H2 – Tinsley Lane	<p>Proposed development of Tinsley Lane sports fields is unsound for two main reasons. Firstly, access to the proposed development via Birch Lea and Kenmara Court is inappropriate as neither are suitable for increased traffic, access to Tinsley Lane from Gatwick Road is only via a busy roundabout junction and any increased traffic, especially at rush hour, is to be avoided for safety reasons. Also the exit onto Gatwick road from Maxwell Drive is unsuitable for further increased traffic. Secondly the substantial reduction in sports/recreational facilities caused by the development is unsuitable given the existing limited recreational facilities in the area and the increasing population of Crawley.</p> <p>Suggested Modifications: The Local Plan should be modified to reassign the designation of the Tinsley Lane development to recreational/sports use, not housing.</p>
REP/140	Resident 55	H2 – Tinsley Lane SHLAA February 2023	<p>Objection: The Tinsley Lane Residents Association objects to the land east of Tinsley Lane being designated as suitable for 120 dwellings as this number is too large and does not allow enough recreation space for Oakwood Football Club to meet its current needs. There is also no suitable access to the site that could safely cope with the traffic generated by such a large number of houses. The central and southern fields should be retained for recreation to satisfy the current and future needs of the increasing population of Crawley.</p> <p>Suggested Modifications: In the initial version of the Local Plan the land east of Tinsley Lane was designated for recreation only. Since then many schools and residential areas have lost playing fields to housing and other developments while the population of the borough has increased dramatically. This has resulted in many of our local youth teams are having to travel to neighbouring towns to play sport. Unless Oakwood F.C. are allowed to retain the land they currently use many of their youth teams (both boys and girls) will have nowhere to play. Once recreational land is lost it will never be recovered so the Tinsley Lane sports fields need to be protected. Birch Le is not suitable as the main access to a development of this size as is shown by the safety audit carried out by a professional traffic consultant on behalf of the TLRA. The narrow width of the road together with the double bend would make it extremely dangerous for residents of Birch Lea who attempt to exit their driveways.</p>

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REP/141	Resident 56	H2 – Tinsley Lane PPS Needs Assessment	The land allocated to Oakwood Football Club for development is insufficient for their future needs and proposed housing development in Crawley will further increase those needs for a larger football club.
			<p>Suggested Modifications: The proposal for 132 new homes to share the Tinsley Lane using Birch Lea as an entry point is not practical and site will prevent further development of Oakwood club. Could these proposed homes be allocated to other development sites in Crawley and the whole of the site behind Tinsley Lane be allocated to the development of Oakwood Football Club.</p>
REP/142	Resident 57	H2 – Tinsley Lane Development sites listed for housing development	<p>Objection to the inclusion of land to the east of Tinsley Lane for housing, should be retained for sporting recreational use. Detailed objection previously submitted via email.</p> <p>Email sent in on 1 June 2023: I am objecting to the inclusion of the land east of Tinsley Lane continuing to be listed in the proposed local plan as a development site for 120 dwellings.</p> <p>The grounds for my objection are:</p> <p>1 - Unsuitable access route through Birch Lea as already itemised in the detailed road safety assessment carried out by Tinsley Lane Residents Association and submitted as one of the many objections to the currently “pending” outline planning application for this site.</p> <p>2 - The potential impact the change of use and associated loss of land currently delegated for use as recreational space will have on the ability of Oakwood F.C. to field the number of teams of all ages and sexes that it currently does.</p> <p>I believe that should the development proposed in the current Local Plan be maintained then the reduced Oakwood footprint would be inadequate for the number of teams currently run by the club. This is a valuable Crawley resource providing much needed recreational opportunity to young people in particular and any reduction in their ability to service the needs of the wider community should not be countenanced in the proposed local plan.</p> <p>The continuing growth in female football since the lionesses victory last year will only bring put more pressure on existing facilities.</p> <p>Consequently I believe Crawley should be reallocating this land back to leisure use as an investment for future generations to enjoy.</p>
			<p>Suggested Modifications: Removal of the above site from the plan as suitable for housing development.</p>

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REP145	Resident 58	H2 – Tinsley Lane	For environmental, sustainability and recreational reasons, I disagree with the development plans of the Tinsley Lane sports fields. Please refer to the comments for CR/2018/0544/OUT for further details if needed, which remain valid. I understand that Oakwood Football Club wish to remain where they are and I support this fully.
			Suggested Modification: For the Tinsley Lane Housing and Open Space Site to be compliant and sound, water availability, access and traffic concerns need resolving
REP147	Resident 60	H2 – Tinsley Lane Local Plan	<p>Comments and Objection to Crawley Submission Draft Local Plan Specifically Application CR/2021/0355/OUT Land East of Tinsley Lane</p> <p>1.0 Summary of Objections</p> <p>My comments and objections refer to both the overall plan and specifically to the proposed development near Tinsley Lane where the initial proposal was rejected by all 10 Councillors and the revised proposal currently on hold due to the water issues.</p> <p>In summary my comments and objections fall into the following categories and are supported by evidence as you work through this document:</p> <ol style="list-style-type: none"> 1. Birch Lea is still not suitable as the access point for the same reasons as the previous rejected plan. 2. The Plan and specifically the proposed development at Tinsley Lane contravenes your own planning guidelines and Government advice. Lack of adherence to Council Policy and wider Government advice. 3. Resident Quality of Life and Disturbance, including unacceptable harm to the residential amenity. 4. Highway and pedestrian safety, particularly for the disabled. 5. The housing density has not changed significantly as per the previous proposal. 6. Less than 150 dwellings not being Economically viable as previously stated by the Planning Officer. 7. Overlooking/loss of privacy, Noise and Disturbance 8. Adequacy of parking/loading/turning. 9. Significant increase in Traffic generation and Vehicle movements 10. No pressing need to develop the site with other larger developments in the pipeline. 11. Impact on wildlife and habitat in particular bats, deer, foxes, birds, rabbits, trees and wild meadows etc. 12. Significant impact on residents of Birch Lea whose life choices have been to locate to a quiet cul de sac with no passing traffic, if approved this development would create a completely unacceptable increase in the level of traffic, associated noise and reduction in air quality. The narrow pavements will increase the risk to pedestrians and reduce their levels of safety. 13. Air quality is declining in the AQMA, proposed homes fall within this area. 14. Reduction of Sports facilities in Crawley

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			<p>15. Water Neutrality is a very serious issue and will result in water shortages for all residents unless managed effectively</p> <p>I suggest the proposal contravenes your own planning guidelines and Government advice in numerous area and therefore the Planning Application should be rejected In the revised proposal I'm not able to see what significant improvements have been made that would address the issues raised by the Councillors and enable them to change their mind and accept this plan in relation to the access through Birch Lea and housing density. If anything, the revised proposal has made the Birch Lea access point even less desirable on safety grounds.</p> <p>2.0 Overall Applications Adherence to Government and Council Guidance and Standards</p> <p>2.1 Building for Healthy Life - Homes England</p> <p>Create places that are well integrated into the site and their wider natural and built surroundings. Avoid creating isolated and disconnected places that are not easy places to move through and around.</p> <p>What Red Looks Like</p> <p>Single or limited points of access for pedestrians and cyclists. Yes 1 access point Birch Lea</p> <p>Extensive use of private drives. Yes multiple drives along the access road Birch Lea</p> <p>Failing to respond to existing (or anticipate future) pedestrian and cycle desire lines. Failed, Enclosed</p> <p>Development on all sides</p> <p>No opportunities to connect or extend streets and paths if required by later development. None, Enclosed</p> <p>Development on all sides</p> <p>Retaining existing hedgerows between the back gardens of individual homes. Illustrative Plan Removes hedgerows</p> <p>Ransom strips</p> <p>What Green Looks Like</p> <p>Filtered permeability. A useful technique that designs out 'rat running' and creates a pleasant low traffic environment around people's homes whilst still allowing pedestrian and cycle movement. Tinsley lane is already a 'Rat Run' during the evening rush hour.</p> <p>Connecting existing and new habitats; safeguarding existing or creating new movement corridors for nature. No, a wild meadow will be destroyed alongside bordering woodland</p> <p>Where retained, keeping hedgerows within the public realm, safeguarding their future retention and management. Please ensure future plans uphold this requirement, the illustrative plan does not</p> <p>Streets and routes that can be extended in the future. No, enclosed development. The whole site is isolated and disconnected.</p> <p>Short trips of up to three miles can be easily made on foot or bicycle if the right infrastructure is in place, helping to improve public health and air quality whilst also reducing local congestion and carbon emissions.</p>

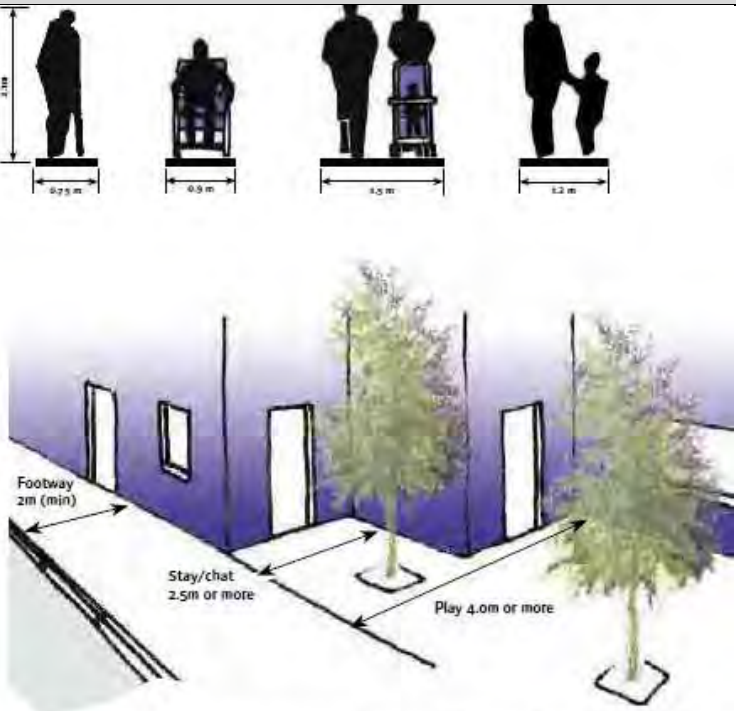
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			<p>What Red Looks Like Travel Packs that fail to influence people's travel choices. Yes people will still need to use cars White line or undivided shared pavement/cycle ways. No, cycleways all shared with motor vehicles Pedestrians and cyclists losing priority at side junctions. Yes Streets principally designed around waste collection vehicles. Yes, adjustments in the plan have been made for waste collection vehicles</p> <p>What Green Looks Like Design out school runs dependent on cars No, nearest schools will require runs dependant on cars Share street space fairly between pedestrians, cyclists and motor vehicles. No motor vehicles take priority in this plan. Removal of footpath to accommodate motor vehicles in Birch Lea as evidence, with a minimum road width of 5.5m. Cycle friendly streets (see Local Transport Note 1/12) with pedestrian and cycle priority (and protection) with across junctions and side streets No, as above. Streets are different to roads. Streets are places where the need to accommodate the movement of motor vehicles is balanced alongside the need for people to move along and cross streets with ease. Activity in the street is an essential part of a successful public realm.</p> <p>What 'red' looks like Roads for cars. Birch Lea being redesigned to accommodate an increase in cars Failure to adhere to the user hierarchy set out in Manual for Streets. Yes Failed Distributor roads with limited frontage access, served by private drives. Yes, Birch Lea Speed control measures that rely on significant shifts in street alignment that contribute towards wasting land whilst also creating disorientating places. Yes, Birch Lea Realignment</p> <p>What's needed Avoid streets that are just designed as routes for motor vehicles to pass through and for cars to park within. Birch Lea redesigned for increased vehicle usage and the removal of a footpath in the latest plan to accommodate vehicles. <ul style="list-style-type: none"> • Provide conditions for cycling appropriate to the speed and volume of motor traffic. No provision for safe cycling has been made. • Inclusive design: think about how people with visual, mobility or other limitations will be able to use the street confidently and safely See section on Footpath and pedestrian Safety Creative surface water management such as rills, brooks and ponds enrich the public realm and help improve a sense of wellbeing and offer an interaction with nature. As the richest habitat for a range of flora and fauna, they are also a key play in achieving the net gain in biodiversity sought by the 2020 Environment Bill. The loss of a wild meadow and approximately 300 trees to accommodate this development does not support the 2020 Environment Bill</p> <p>What Green Looks Like</p>

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			<p>Biodiversity net gain. No, Biodiversity net loss</p> <p>Plans that identify the character of new spaces, such as 'parks', 'woodland', 'allotments', 'wildflower meadows' rather than 'P.O.S.'. Loss of a wild meadow, see photos later in this document</p> <p>Allow people to connect with water. No, access to Gatwick stream via a footbridge to Grattons Park was rejected</p> <p>Create a habitat network providing residents with opportunities to interact with nature on a day to day basis. Wildlife does not flourish within disconnected back gardens, artificial lawns and tightly mown grass. Wildlife will not flourish when replacing a wild meadow with artificial football pitches Provide natural surveillance opportunities. A connected and accessible network of public open spaces with paths and other routes into and through.</p> <p>Species rich grasslands. Rich grassland is being replaced by artificial football pitches</p> <p>Well considered management arrangements whether public or privately managed. Current evidence of the management of grass verges around the area indicate that this is not well considered or managed . See photos of Birch Lea grass verge.</p>  <p>What Red Looks Like</p> <p>Small pieces of land (typically grassed over) that offer little or no public, private or biodiversity value that over time become neglected and forgotten. Yes according to the illustrative Plan</p>

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			<p>Buildings that turn away from open spaces. Poor quality finishing, detailing and maintenance. Yes, Apartments on the Plan Garden cities, towns and suburbs used hedges to define public and private spaces, helping to create characterful and biodiverse places. The space between the back of the pavement and the face of buildings has a significant impact on the quality of a place. Clear demarcations between public and private spaces can encourage people to personalise the front of their homes whilst also offering opportunities to integrate level changes, utility boxes and waste storage.</p> <p>Boundary treatments that add ecological value and/or reinforce distinctive local characteristics. No, removal of trees and hedgerows</p> <p>Well integrated waste storage and utility boxes. No, not for the houses If relying on rear garden storage solutions for terraces and townhouses, provide direct access to these from the street. Not according to the illustrative Plan</p> <p>Ground floor apartments with their own front doors and semi-private amenity spaces help to enliven the street whilst also reducing the amount of people using communal areas. Not for the apartments Consider providing terraces or balconies to above ground floor apartments – these can also help to enliven the street, increase natural surveillance and provide residents with access to the open air. No not in the design</p> <p>What Red Looks Like Waste storage solutions for terraced homes that rely on residents storing bins and crates in rear garden spaces and instead often sees bins and crates placed next to front doors. Yes based on the illustrative Plan</p> <p>2.2 Manual for the Streets - Ministry of Transport 2007 The extracts below make it clear that cycling and walking should be a key consideration in any planning application and this should meet the standards set by the Ministry of Transport. Utilisation of vehicles should be minimised.</p> <p>Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPS134 states that walking offers the greatest potential to replace short car trips, particularly those under 2 km. MfS encourages a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance of most residents.</p> <p>Distances and Times on foot from Birch Lea, one-way: Three bridges primary school 1.9km mins, Forge Wood Primary School 2.7km 33 mins,</p>

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			<p>Gatwick school 1.1, 14 mins, Hazelwick 1.0 km 12 mins, Tesco 1.2 km 15 mins. Wickes DIY 2.1 km 26 mins Screwfix 1.5km 18 mins Tool Station 900m 10mins Aldi, Marks and Spencer, Tesco Express, County Oak 2.4 km 29 mins All outside the recommended 800m 10 minute walk threshold laid down, encouraging the use of Cars. It is recommended that the design of a scheme should follow the user hierarchy shown in Table 3.2. Table 3.2: User hierarchy Consider first Pedestrians Cyclists Public transport users Specialist service vehicles (e.g. emergency services, waste, etc.) This is not the case in the revised proposal, see the section covering Footpath and Pedestrian safety. “2.7 Disability discrimination 2.7.1 Highway and planning authorities must comply with the Disability Equality Duty under the Disability Discrimination Act 2005.16 This means that in their decisions and actions, authorities are required to have due regard to the six principles of:</p> <ul style="list-style-type: none"> • promote equality of opportunity between disabled persons and other persons; • eliminate discrimination that is unlawful under the 2005 Act; • eliminate harassment of disabled persons that is related to their disabilities; • promote positive attitudes towards disabled persons; • encourage participation by disabled persons in public life; and • take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons. <p>2.7.2 Those who fail to observe these requirements will be at the risk of a claim. Not only is there an expectation of positive action, but the duty is retrospective and local authorities will be expected to take reasonable action to rectify occurrences of non-compliance in existing areas. 2.7.3 The Disability Rights Commission (DRC) have published a Statutory Code of Practice on the Disability Equality Duty and they have also published specific guidance for those dealing with planning, buildings and the street environment.</p>

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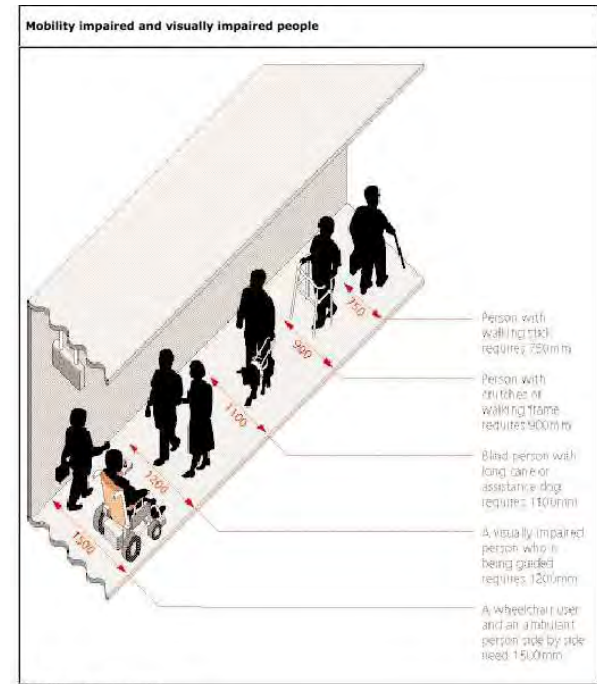
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			 <p data-bbox="801 1005 1534 1045">Figure 6.8 The footway and pedestrian areas provide for a range of functions which can include browsing, pausing, socialising and play.</p> <p data-bbox="768 1085 2029 1361">6.3.20 Inclusive Mobility gives guidance on design measures for use where there are steep slopes or drops at the rear of footways. 6.3.21 Places for pedestrians may need to serve a variety of purposes, including movement in groups, children’s play and other activities (Fig. 6.8). 6.3.22 There is no maximum width for footways. In lightly used streets (such as those with a purely residential function), the minimum unobstructed width for pedestrians should generally be 2 m. Additional width should be considered between the footway and a heavily used carriageway, or adjacent to gathering places, such as schools and shops. Further guidance on minimum footway widths is given in Inclusive Mobility.</p>

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			<p>6.8.13 The design of new developments should not require waste bins to be left on the footway as they reduce its effective width. Waste bins on the footway pose a hazard for blind or partially sighted people and may prevent wheelchair and pushchair users from getting past.</p> <p>2.3 Inclusive Mobility - Department of Transport</p> <p>2 Basic human factors information</p> <p>2.1 Definitions</p> <p>It is essential that design for people with mobility impairments should be to the highest possible standards. This requires knowledge of the capabilities of different types of person. This section provides information on the basic human requirements for ease of movement. In designing or modifying facilities the aim should be to be generous in the allocation of space.</p> <p>The term disability is a broad one. It includes people with physical, sensory or mental impairment; at a conservative estimate between 12 and 13 per cent of the population have some degree of impairment. Many, though not all, face barriers to movement in the environment. This guide is intended to show how these barriers can be removed or at least reduced, but it does have a wider relevance because there are many other people not conventionally considered to have a disability who also encounter barriers to movement.</p> <p>People with small children, people carrying heavy shopping or luggage, people with temporary accident injuries and older people can all benefit from good design of the pedestrian and transport environment. Without a barrier free environment, many of these people will be mobility impaired. While it is true that there are many aspects of design in the pedestrian environment that are helpful to all or most disabled people (and many others as well) there are also some specific facilities needed by people with a particular kind of impairment.</p> <p>Manual wheelchair users need sufficient space to be able to propel the chair without banging their elbows or knuckles on door frames or other obstacles. But someone who walks with sticks or crutches also needs more space than a non-disabled walker; so too does a long cane user or person carrying luggage, or a lot of shopping bags, or with small children. Thus providing adequate clear space on pavements, along passages in public buildings, through doorways etc, is of benefit to many people.</p> <p>The DDA defines a person as having, a disability if he has a physical or mental impairment which has a substantial and long term adverse effect on his ability to carry out normal day-today activities. There are various ways or models used to define disability, but in functional terms this guide is mainly concerned with the following:</p> <p>Locomotion, which includes people who use wheelchairs and those who can walk but only with difficulty often using some form of aid such as a stick or walking frame. Approaching 70% of disabled people have locomotion difficulties: those with walking difficulties outnumber wheelchair users by about 10:1.</p>

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			<p>Seeing, which can be sub-divided into blind and partially sighted people. It is estimated by the Department for Work and Pensions (DWP) that there are almost two million people in Great Britain with a significant sight loss.</p> <p>Hearing, which can also be sub-divided into those who are profoundly deaf and those with impaired hearing, ranging from severe to mild deafness. The Royal National Institute for Deaf People (RNID) estimates that there are over eight million deaf or hard of hearing people in the UK of whom approaching 700,000 are severely or profoundly deaf.</p> <p>Reaching, stretching and dexterity, frequently the result of arthritis, which can make these movements painful and difficult, or of muscular dystrophy causing a loss of muscular strength, or of complaints of the nervous system.</p> <p>Learning disability, making it hard to understand complicated information or to use complex machines (like some ticket machines). It should be remembered that these categories are not mutually exclusive.</p> <p>Many disabled people, particularly older people, have more than one impairment. The following paragraphs give some basic information on the space needed by people when they are standing or moving. Of course there is a lot of variation in this, but if the dimensions given below are used then the great majority of disabled people will be able to move around buildings and the environment much more easily.</p> <p>2.2 Mobility impaired and visually impaired people</p>

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			<p>Someone who does not use a walking aid can manage to walk along a passage way less than 700mm wide, but just using a walking stick requires greater width than this; a minimum of 750mm. A person who uses two sticks or crutches, or a walking frame needs a minimum of 900mm, a blind person using a long cane or with an assistance dog needs 1100mm. A visually impaired person who is being guided needs a width of 1200mm. A wheelchair user and an ambulant person side-by-side need 1500mm width.</p> <p>3 Footways, footpaths and pedestrian areas The distinction between a footway and a footpath is that a footway (usually called the pavement) is the part of a highway adjacent to, or contiguous with, the carriageway on which there is a public right of way on foot. A footpath has no contiguous carriageway. Where reference is made to one, it can generally be regarded as applying to the other for design purposes.</p> <p>3.1 Widths A clear width of 2000mm allows two wheelchairs to pass one another comfortably. This should be regarded as the minimum under normal circumstances. Where this is not possible because of physical constraints 1500mm could be regarded as the minimum acceptable under most circumstances, giving sufficient space for a wheelchair user and a walker to pass one another. The absolute minimum, where there is an obstacle, should be 1000mm clear space. The maximum length of restricted width should be 6 metres (see also Section 8.3). If there are local restrictions or obstacles causing this sort of reduction in width they should be grouped in a logical and regular pattern to assist visually impaired people.</p> <p>The extracts above demonstrate the issues relating to Birch Lee safety for pedestrians as I have laid out in the Footpath and Pedestrian Safety section of this document.</p> <p>2.4 Crawley Borough Council Policy</p>



2.3 Wheelchair users

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			<p>I have highlighted below the Crawley Borough Council policies that are not being adhered to as part of this application.</p> <p>CRAWLEY BOROUGH COUNCIL PLANNING COMMITTEE - 29 September 2020 REPORT NO: PES/355(a)</p> <p>PLANNING CONSIDERATIONS:-</p> <p>Crawley Borough Local Plan 2015-2030</p> <p>4.2 The following policies from the Crawley Borough Local Plan (adopted December 2015) are most relevant to the proposal:</p> <p>Policy CH1 (Neighbourhood Principles) states that the neighbourhood principle would be enhanced by maintaining the neighbourhood structure of the town with a clear pattern land uses and arrangement of open spaces and landscape features.</p> <p>This proposal will not enhance the neighbourhood for the current residents of Tinsley Lane East for the reasons stated in this document.</p> <p>Policy CH2 (Principles of Good Urban Design) states that in order to assist in the creation, retention or enhancement of successful places. In particular, development proposals will be required to:</p> <p>“(a) respond to and reinforce locally distinctive patterns of development and landscape character and to protect and/or enhance heritage assets,</p> <p>This proposal is not in keeping with the local neighbourhood character as stated by the Tinsley lane Residents association and many of the people who have written to the council objecting to the plans. The number of homes and the fact that a number will be 3 stories high is a major issue.</p> <p>(b) create continuous frontages onto streets and spaces enclosed by development which clearly defines private and public areas, (c) create public spaces and routes that are attractive, safe, uncluttered and which work effectively for all in society including disabled and elderly people,</p> <p>See my comments under the Section Footpath and Pedestrian Safety Birch Lea (d) make places that connect with each other and are easy to move through,</p> <p>See my comments under the Section Footpath and Pedestrian Safety Birch Lea (e) provide recognisable routes, intersections and landmarks to help people find their way around, (f) consider flexible development forms that can respond to changing social, technological and economic conditions, (g) provide diversity and choice through a mix of compatible development and uses that work together to create viable places that respond to local needs”.</p> <p>Policy CH3 (Normal Requirements of All New Development) states all proposals for development in Crawley will be required to make a positive contribution to the area; be of a high quality design, provide and retain a good standard of amenity for all nearby and future occupants of land and buildings and be able to meet its own operational requirements necessary for the safe and proper use of the site.</p>

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			<p>The proposed access route would affect the quality of life for the residents of Birch Lea and other local residents. This view was supported by local Council representatives, nothing materially has changed in the new proposal with regards Birch Lea as the access point. See below Ian Irvine (Lab, Broadfield) said using Birch Lea would affect the quality of life of those residents and called on Homes England to come up with a better idea. Liam Ascough (Con, Gossops Green & North East Broadfield) agreed. He said: "I do agree we obviously need more housing in Crawley – however I disagree when it's a detriment to existing residents. "Birch Lea will be too difficult and will cause too many issues for the residents living there now." My safety concerns have been highlighted in the Footpath and Pedestrian Safety Birch Lea Section.</p> <p>Policy CH6 (Tree Planting and Replacement Standards) requires landscape proposals for residential development to contribute to the character and appearance of the town by including at least one new tree for each new dwelling. In addition, any trees lost as a result of the development must be replaced or mitigated. Where possible the trees are expected to be provided on site although, where this is not feasible, commuted sums will be sought in lieu. See Section 4.0 of this document</p> <p>Policy H1 (Housing Provision) the Council will positively consider proposals for the provision of housing to meet local housing needs, ensuring that town-cramming or unacceptable impact on the planned character or neighbourhoods or residential amenity do not result. See above Policy CH2 (a)</p> <p>Policy ENV2 (Biodiversity) states that all development proposals will be expected to incorporate features to encourage biodiversity where appropriate. The loss of a wild meadow to football pitches does not constitute encouraging biodiversity.</p> <p>Policy ENV5 (Provision of Open Space and Recreational Facilities) states that the impact of the increased population from residential development on open space and recreational facilities across the Borough will be mitigated by the use of the Community Infrastructure Levy which will be used to enhance existing areas of open space. This Policy requires development to make provision for open space and recreational facilities. As above</p> <p>Policy ENV10 (Pollution Management and Land Contamination) states where a site is known or suspected to be at risk from contaminants or materials that present a hazard to health, information must be provided detailing the methodology through which risks will be addressed, and ensuring the treatment and/or removal of all such contaminants and materials prior to the commencement of development.</p> <p>The Planning Application Form states in section 6. Existing Use - Land where contamination is suspected for all or part of the site Answer – Yes. I have not seen any information regarding the methodology through which the risk will be addressed.</p> <p>Policy ENV11 (Development and Noise) advises that residential and other noise sensitive development will be permitted where it can be demonstrated that users of the development will not be exposed to</p>

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			<p>unacceptable noise disturbance from existing or future uses. To achieve this, this policy should be read in conjunction with the Local Plan Noise Annex.</p> <p>Has the additional runway (use of emergency runway as fully operational) at Gatwick proposed for 2023 coinciding with this new development been considered alongside the already significant noise pollution from the goods yard and the current airport noise.</p> <p>Policy ENV12 (Air Quality) states that development proposals that do not have a material negative impact upon air quality will normally be permitted. The policy seeks assessment of the air quality implications of appropriate schemes and, for proposals within an Air Quality Management Area, demonstration of mitigation measures. See the section under Air Quality for my response.</p> <p>Policy IN1 (Infrastructure Provision) states that development will be permitted where it is supported by the necessary infrastructure both on and off site and if mitigation can be provided to avoid any significant cumulative effects on the existing infrastructure services. The council will seek to implement a Community Infrastructure Levy (CIL) through the relevant processes. The rate will be set following the adoption of the Charging Schedule. See the section Birch Lea Access / Increased Traffic</p> <p>Policy IN3 (Development and Requirements for Sustainable Transport) advises that development should be concentrated in locations where sustainable travel patterns can be achieved through the use of the existing transport network, including public transport routes and the cycling and walking network.</p> <p>Developments should meet the access needs they generate and not cause an unacceptable impact in terms of increased traffic congestion or highway safety. See the section Birch Lee Access / Increased Traffic / Footpath and Pedestrian Safety</p> <p>Principle of the development</p> <p>5.5 The main change since the adoption of the Local Plan and Development Brief has been the increase in the numbers of dwellings proposed to “up to 150.” This raises a number of issues regarding the capacity of the site, its ability to physically accommodate 150 houses with appropriate internal and external space provision and also the resulting impact, such as potential overlooking and vehicle movements, upon existing residents in the surrounding area. These issues still remain with the revised proposal, a reduction of 12 dwellings does not alter the significant impact on local residents as laid out in this document.</p> <p>5.6 The applicant, in responding to officers’ concerns, has highlighted Crawley’s housing needs, its unmet needs within the Borough and the potentially increased provision to meet the Government’s New Standard Methodology. Whilst recognising that the additional 30 (Now 18 with revised proposal) dwellings above the Local Plan allocation would help to meet the town’s needs, officers do not accept that this alone justifies the higher number. The Forward Planning team has commented that “whilst Crawley has a known housing</p>

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			<p>need above that which can be accommodated within its boundaries, this 'unmet need' figure was recognised by the Local Plan Inspector and has been accounted for within the Local Plans for Mid Sussex (2018) and Horsham (2015) districts." They also confirm that Crawley is currently exceeding the Local Plan's annualised average housing delivery figure of 340 dwellings per annum. That said, policy H1 of the Local Plan takes a positive approach to housing proposals which meet local housing needs and will consider all reasonable opportunities for development, whilst guarding against town cramming or unacceptable amenity impacts. Therefore, whilst it is not considered that Crawley's needs justifies the higher number in its own right, national and local policy requires careful assessment of proposals to help make the best use of land. The capacity of the site is addressed in greater detail below.</p> <p>The above demonstrates that there is no pressing need to build on the Land East of Tinsley lane and the Council is exceeding it's obligations per year. The proposed huge development around Ifield circa 10,000 dwellings, the sale of Cottersmore Golf Club for housing brings into perspective how insignificant this proposal is in the greater scheme of things and other wider West Sussex housing plans. This does call into question the need to develop this land and why the planning officer is hell bent on doing so, despite all of the objections and the recent rejection of the plan by all 10 councillors.</p> <p>Sports provision</p> <p>5.11 A key policy requirement is to ensure that sports provision, in terms of both capacity and quality, is not harmed as a result of the proposed development. This requirement has played a significant role in shaping the layout and phasing of the development. Originally, a replacement full size grass pitch, with related facilities, was proposed on the northern part of the site to relocate Oakwood FC. Alongside it, a smaller junior 3G artificial pitch was proposed. The capacity has clearly been reduced from 4 to 2 pitches with one replacement being a 9 a side. The capacity and quality of the Oakwood Sport facilities for the multiple Teams would undoubtedly be harmed in contravention of the above policy</p> <p>5.12 As well as being used by the Oakwood first team, the site has also been used in recent years by the reserves, Under 18s, Crawley Wasps ladies first team and by a significant number of junior teams. Sport England raised concerns that the full size grass pitch initially proposed by the applicant would be unable, due to wear and tear, to accommodate use by Oakwood first team, reserves, Under 18s and Crawley Wasps ladies first team. They were concerned too that the smaller artificial pitch would provide insufficient capacity for the junior teams using the wider site currently and also that some of the older junior teams required a larger pitch anyway. Sport England therefore objected to the initial proposal for relocation of the sports pitches.</p> <p>I'm not sure the revised plan is viable given the inaccuracies of the information relating to the number of teams and assumption that the central area is used mainly for training which is clearly not true.</p>

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			<p>Strategic Policy OS1: Open Space, Sport and Recreation Proposals that remove or affect the continued use of existing open space, sport and recreational spaces will not be permitted unless:</p> <p>a) An assessment of the needs for open space, sport and recreation clearly show the site to be surplus to requirements; or</p> <p>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</p> <p>c) The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</p> <p>Whilst a site may be surplus to requirements as open space it may still be of environmental or cultural value; or the site's development may have unacceptable visual or amenity impact, or adversely affect its wider green infrastructure functions, including for climate change mitigation. Therefore, applicants should also carefully consider the character, landscape, biodiversity and other environmental policies in the Plan.</p> <p>a) The site is not surplus to requirements as evidenced by the significant number of teams using the existing facilities.</p> <p>b) The loss will not be replaced by equivalent or better provision, the plan loses 4.2 ha and creates 2.7ha, a net loss of 1.5ha</p> <p>c) No development of alternatives are being considered</p> <p>The proposal does not meet Strategic Policy OS1.</p> <p>5.13 The Local Plan inspector stated in his report that “the issue is whether the loss of the central area, which appears to be used mainly for training, would be adequately compensated by the provision of an STP (Synthetic Turk Pitch) pitch alongside the senior pitch on the one playing field that would remain. Provided the STP pitch is large enough for youths and training (Sport England advises 79m x 52m), and wider club/community use can be secured, then despite the quantitative loss there would be a small enhancement to the existing provision in terms of capacity for use ... In these circumstances I consider that the allocation would satisfy NPPF paragraph 74, which seeks to protect existing open spaces (including playing fields) from development in terms of quantity and quality unless equivalent or better replacement provision is made...” In assessing the scheme, officers and Sport England have assessed as far as possible whether there have been any material changes in use since the Local Plan examination. It has proved difficult to ascertain a clear picture of existing use by the various football clubs using the site. However, although there has potentially been a slight increase in adult teams (such as Crawley Wasps) and older junior teams using the pitches, any change appears limited. In addition, some of these teams appear not to play matches on a weekly basis. Officers have concluded that there is insufficient evidence to support any increase in the area of playing pitches to be provided beyond that assessed at the Local Plan examination.</p>

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			<p>3G pitches are often made from used car tyres and contain chemicals such as lead, mercury and benzene. In the Netherlands more than 100 clubs have banned their use for youth games after analysis of 60 showed carcinogen levels to be up to six times higher than would be allowed for consumer products. I live in Kenmara Close and back on to Oakwood Football Club central area, the statement 'loss of the central area, which appears to be used mainly for training' is simply not true. I witness multiple matches every weekend and during the week, alongside regular training sessions. I'm happy to provide photographic evidence if required.</p> <p>As I write this on Saturday the 19th June 10:00 a match has just started on the central section, this is now a weekly occurrence. Today Sunday 20th June 12:09 as I finalise this document ,another football match is taking place on the central section, definitely not only used for training.</p> <p>The Teams registered on the Oakwood Website are detailed below</p> <p><u>SENIOR</u></p> <p>Men's 1st Team Mens U23's Oakwood Kent Ladies</p> <p><u>BOYS YOUTH</u></p> <p>U11 Boys U10 Boys RED MSYMFL U15's Boys (Blue) MSYMFL U12 Boys Red MSYMFL U15's Boys (Red) Horsham U15's Boys (Black) MSYMFL U8's Boys U18's Boys U16's Boys (Black) Epsom U16's Boys (Red) Mid Sus U16's Boys (Mid Sussex) U14's Boys Tandridge U11's Boys MSYMFL U10's Boys (Black) MSYMFL Mini Oaks Dev Centre</p> <p><u>GIRLS YOUTH</u></p> <p>U13 Girls (Red) Surrey U13s Girls (Black) SCWGFL U11's Girls SCWGFL U18's Girls Surrey</p>

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			<p>U15's Girls U15's Girls (SCWGFL) U13's Girls Blue SCWGFL Wildcats Dev Centre</p> <p>Excluding the 1st Teams, the Fixtures Calendar on the Web Site for 2023 shows 14 games in February, 17 games in March and 19 games in April.</p> <p>There are Three / Four* current pitches accommodating at least 20 teams as shown above, taken from the Oakwood FC Web Site, reducing to one full and one 9 a side pitch. This does not equate to a small enhancement or quantity equivalent. *The configuration changes in the central section from 2 full size to 1 full size and 2 junior pitches.</p> <p>The above summary of the fixtures for Feb, March and April 2023, clearly demonstrates the significant number of matches played on the Centre playing field and not just training.</p> <p>5.15 The pitch sizes are unchanged, but the provision of a larger artificial, rather than grass, pitch will allow more regular use. This would enable it to cope successfully with wear and tear from use by the four adult senior teams. This pitch would also be able to contribute towards meeting training needs of the clubs and enable use for junior matches.</p> <p>The smaller grass pitch would be used for junior teams' training and matches.</p> <p>The junior pitch would need to accommodate up to 20 Junior Teams, this is just not feasible.</p> <p>5.16 The proposed development would involve the loss of existing sporting facilities. Therefore, in responding to the revised proposal, Sport England has assessed the scheme against exception 4 of its playing pitch policy. This states that: <i>"The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:</i></p> <ul style="list-style-type: none"> • <i>of equivalent or better quality, and</i> Not True • <i>of equivalent or greater quantity, and</i> Not True • in a suitable location, and • subject to equivalent or better accessibility and management arrangements." <p>5.31 <i>The Council's Refuse and Recycling team commented on the initial and revised masterplan, stating that they had concerns about the accessibility of the refuse/recycling stores for collection vehicles and the possible pull distances involved.</i> This, together with the size and capacity of the stores for any flats, would need to be addressed by any Reserved Matters application. As a detailed point, it is considered that it can satisfactorily be addressed by condition at this outline stage.</p> <p>5.33 The new residential element of the proposal would be accessed through Birch Lea, along which the applicant proposes highway works. These works would remove some of the existing grass verge to widen and realign the carriageway and to provide three new parking bays. <i>A new footpath would be created on the northern side of the road.</i> The proposed new sports facilities would be accessed through Kenmara</p>

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			<p>Court. Kenmara Court would be more formally laid out, with dropped kerbs provided to existing driveways. Other than an emergency access and a pedestrian link, there would be no direct connection for vehicles between the north (sports) and south (residential) sections of the proposed development.</p> <p>The new footpath has been removed in the revised proposal creating a single narrow footpath which doesn't meet the required standards and is dangerous to pedestrians. See section on Footpath and Pedestrian Safety.</p> <p>Kenmara Court Club Access and Emergency Access sheets don't show any footpath/pedestrian link to the Football Club or onward to the residential Section. This means no pedestrian access to the football club with vehicle access only, creating the need for increased parking, pick up and drop off facilities.</p> <p>No pedestrian access to the residential area to Tinsley Lane via Kenmara Court therefore all pedestrian access is via Birch Lea with the risks I have highlighted in the Footpath and Pedestrian Safety Section.</p> <p>5.40 The proposed residential development is anticipated to generate 83 morning peak and 84 evening peak two way vehicle movements using Birch Lea. The modelling undertaken shows that the junctions of Birch Lea/Tinsley Lane and Tinsley Lane/Gatwick Road would both continue to operate satisfactorily. In terms of mitigation, although not strictly required as a result of the proposed development, a traffic calming scheme along Tinsley Lane is proposed by the applicant. This would be the subject of further consultation with local residents, but could help to address existing and future parking and traffic flow issues.</p> <p>138 houses with the associated cars generating approximately 343 vehicle movements per day, an average of one every 2.8 minutes, increasing to 446 by 2026</p> <p>See Section on Birch Lea.</p> <p><u>2.5 Crawley Guidelines for Planning</u></p> <p>I have included excerpts from the Crawley guidelines for planning to illustrate where this proposal does not comply with your own standards. As a general point and following the TLA Residents association meeting an underlying trend is for Crawley Council and West Sussex County Council to ignore their own guidelines when it suits their own agenda as demonstrated in this response.</p> <p><u>Tree Planting and Replacement Standards</u></p> <p>The plan suggests that 17 trees will be removed with a further 20 at risk. Depending on the size of those trees and in accordance with your standards a minimum of an additional 175 trees is required to comply with your policy (Assumes all removed trees are less than 19.9 cm diameter), I don't see this on the plan.</p> <p><u>Air Quality</u></p> <p>The air quality review is inaccurate, I refer to the Section Air Quality.</p> <p>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;</p> <p>The proposed site has no streets lights and is intrinsically dark, this development will introduce street lights and go against the above guidelines and directly impact the light into the houses backing on to the current fields.</p>


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			<p>Does not generate an unacceptable level and/or frequency of noise in areas relatively undisturbed by noise and valued for their recreational or amenity value;</p> <p>138 houses with the associated cars generating approximately 343 vehicle movements per day, an average of one every 2.8 minutes generating a significant amount of noise in an area that is currently undisturbed by noise and valued for its recreational value. This number will increase to 446 by 2026</p> <p>Does not generate traffic of a type or amount inappropriate to the rural roads; and viii. Does not introduce a use which by virtue of its operation is not compatible with the countryside.</p> <p>An additional 343 vehicle movements, increasing to 446 by 2026 on what is essentially a country lane goes against the above policies, particularly down a current cul de sac. Birch Lee with a proposed minimum road width of 5.5 m and a small country lane, Tinsley Lane.</p> <p>ensuring the neighbourhood centres remain the focal point for the local community, providing facilities that meet their day-to-day needs within walking distance</p> <p>The only access to local amenities will require all new residents walking through the one and only entry and exit point requiring a significant distance to walk to existing facilities. See notes regarding local facilities and the distances beyond 800m.</p> <p>Progress towards Crawley's commitment to being carbon neutral by 2050 and adapts to climate change;</p> <p>The cumulative impact of this development plus those on Manor Royal / Gatwick Road, Forge Wood is encouraging a significant amount of additional traffic to the area and goes against the desire to become carbon neutral, the placement of this development encourages people to have cars in order to realistically commute to other areas of Crawley.</p> <p>Provides a safe and secure environment for its residents and visitors;</p> <p>The placement of this development is in a secluded area with woods all around, which creates a higher risk environment for crime, I have not seen any police presence in this area for years.</p> <p>I genuinely believe the proposed access via Birch Lea is not safe for pedestrians as detailed in the Footpath and Pedestrian Safety Section.</p> <p>create public spaces and routes that are attractive, safe, uncluttered and which work effectively for all in society, including disabled and elderly people;</p> <p>The proposed access is considering vehicles and does not consider the needs of elderly and disabled in using mobility scooters and having to cross multiple driveways on a narrow pavement with parked cars and a blind bend, this is not safe, not attractive, cluttered with cars and hazards.</p> <p>make places that connect with each other and are easy to move through, putting people before traffic and integrating land uses and transport networks;</p> <p>No connection to existing cycle routes and all access is through a single access point for all traffic, pedestrians, cyclists and mobility scooters, wheelchairs etc. This proposal does not put people before traffic, the whole design is focused on the traffic concerns for access and does not include adequate pavement and cycle access for 138 houses. Ease to move through is not compatible with a single access</p>

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			<p>point for 138 households. Bin lorries collecting refuse will stop access in and out of the development on collection days as will delivery and supermarket delivery Trucks and Vans</p> <p>Lack of adequacy for parking, loading and turning in Birch Lee, the proposed access point.</p> <p>Access onto Gatwick Road will not allow Ease of movement, regularly the entire road is queued during rush hour encouraging 'rat run' traffic down Tinsley Lane.</p> <p>Applications must include information that demonstrates that these principles would be achieved, or not compromised, through the proposed development</p> <p>As above</p> <p>All proposals for development in Crawley will be required to:</p> <p>c) Provide or retain a good standard of amenity for all existing and future occupants of land and buildings, including compliance with internal standards for new dwellings as set out in Policy CH5, 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;</p> <p>The current illustrative proposal will create an issue with overlooking and privacy with homes being built with a view directly into 3 bedrooms and the garden of my property which currently have nothing overlooking the property.</p> <p>Traffic and noise have been mentioned earlier and will be in breach of the above requirement given the size of the development and single access point.</p> <p>d) Retain existing individual or groups of trees that contribute positively to the area and allow sufficient space for trees to reach maturity. Sufficient space should also be provided in private gardens that would not be overshadowed by tree canopies; and proposals should ensure that rooms within buildings would receive adequate daylight. Where a development is proposed or where trees would be lost to development, tree planting should accord with the standards set out in Policy CH6; CRAWLEY 2030: CRAWLEY BOROUGH LOCAL PLAN 2015 – 2030 CRAWLEY BOROUGH COUNCIL DECEMBER 2015 29</p> <p>Trees mentioned in Section 4.0</p> <p>e) Demonstrate how “Secure by Design” principles and guidance set out in “Secured by Design” design guide (as amended) have been incorporated into development proposals to reduce crime, the fear of crime, anti-social behaviour and disorder. For all development, the potential impact on community safety must be carefully considered at the earliest opportunity to ensure that measures are integrated into proposals without compromising other objectives;</p> <p>Mentioned above the location is secluded and has significant areas of woodland which could attract anti social behaviour and potential criminal activity, drug dealing, illegal drinking, drug taking, etc.</p> <p>f) 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</p>

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			<p>As mentioned above access is a major issue through a single narrow access with parking bays and multiple driveways, pedestrians, cyclists, Bin Lorries, delivery vehicles, vehicles manoeuvring all adding to a significant safety issues against the above recommendations.</p> <p>Street Design and Parking 2.24 Streets take up a large amount of the public realm and play a critical role in facilitating movement through urban areas. Therefore, the layout and design of streets is integral for the success of the urban environment. Effective street layout and design should:</p> <ul style="list-style-type: none"> • Improve the legibility of a place; • Reduce crime; • Encourage walking and cycling and recognise that pedestrians should be prioritised; • Improve sustainability through the use of appropriate materials; • Improve sustainability through encouraging lower speeds and, consequently, reducing vehicle emissions; • Improve safety through encouraging reduced speeds along residential streets; • Be flexible in use; • Be inclusive in its design. • Be permeable, that is, provide many ways to get from point A to point B <p>The above principles have not been adhered to in particular Encourage walking and cycling and recognise that pedestrians should be prioritised; See section on Footpath and Pedestrian Safety</p> <p><u>3.0 Housing Density and Land Use</u></p> <table border="1"> <thead> <tr> <th>Land Use</th> <th>New Proposal</th> <th>Old Proposal</th> <th>Variance</th> </tr> </thead> <tbody> <tr> <td>Total Land</td> <td>11.62</td> <td>11.70</td> <td>-0.8</td> </tr> <tr> <td>Sports</td> <td>2.53</td> <td>2.34</td> <td>0.19</td> </tr> <tr> <td>Open Space</td> <td>1.23</td> <td>1.46</td> <td>-0.23</td> </tr> <tr> <td>Green Space</td> <td>4.60</td> <td>4.80</td> <td>-0.20</td> </tr> <tr> <td>Residential</td> <td>3.05</td> <td>2.85</td> <td>0.02</td> </tr> <tr> <td>Access</td> <td>0.19</td> <td>0.25</td> <td>-0.25</td> </tr> </tbody> </table> <p>Design and Access Statement Executive Summary</p> <p><i>An increase in the quantity of public space</i></p>	Land Use	New Proposal	Old Proposal	Variance	Total Land	11.62	11.70	-0.8	Sports	2.53	2.34	0.19	Open Space	1.23	1.46	-0.23	Green Space	4.60	4.80	-0.20	Residential	3.05	2.85	0.02	Access	0.19	0.25	-0.25
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			<p>According to the numbers above the new plan is a reduction in public space, green space reduce by 0.2 ha, open space reduced by 0.23ha with an increase on sports space by 0.19ha, a net loss of 0.24ha against the old proposal.</p> <p>The residential space has increased by 0.2 ha, the overall land has some how reduced by 0.08 ha, with the sports space increasing by 0.19ha and, more worryingly, the green space has reduced by 0.2ha, presumably this is loss of the ancient woodland in Summersvere Woods. The variance in the numbers does call into question the accuracy of the planning application compared with the previous submission.</p> <p>In summary more space allocated to residential and sports use, loss of woodland, loss of green space, hardly an improvement on the previous proposal, the density may have reduced marginally but at the expense of woodland and green space.</p> <p>The housing density on the new proposal within the space set a side for residential use is 45.24 dwellings per hectare. The design statement states 32 per hectare, this must include open space in the calculation. The actual calculation is 32.24 dwellings per hectare</p> <p>The old proposal shows 34.8 dwellings per hectare a reduction of 2.56 dwellings per hectare equating to a 7.3% reduction, I don't believe this makes a material enough difference to change the original decision to reject the proposal on density grounds,</p> <p>The surrounding area varies from 15-25 per hectare with the new proposal ranging from 25-45 and therefore the new proposal is not in keeping with the existing neighbourhood.</p> <p>There is a clear discrepancy between the old proposal and new, the old states, Primary land use is residential, the latest one states Predominant land use is open space, I suspect this is in an attempt to soften the impact for readers to try to get the application approved</p> <p>The previous plan states that the residential area covers 18% of the total area the latest is silent, I have calculated that this has increased to 26.24%. I suspect the previous calculation was incorrect and the figure should have been closer to 24.35%. There is still a 2% increase in the residential area or 8% if you use the original figure.</p> <p>Proposed Housing Mix</p> <table border="1"> <thead> <tr> <th></th> <th>New Proposal</th> <th>Old Proposal</th> <th>Variance</th> </tr> </thead> <tbody> <tr> <td>3 Storey</td> <td>32</td> <td>28</td> <td>4</td> </tr> <tr> <td>2.5 Storey</td> <td>32</td> <td>35</td> <td>-3</td> </tr> <tr> <td>2 Storey</td> <td>15</td> <td>27</td> <td>-12</td> </tr> <tr> <td>1 Storey</td> <td>59</td> <td>60</td> <td>-1</td> </tr> </tbody> </table>		New Proposal	Old Proposal	Variance	3 Storey	32	28	4	2.5 Storey	32	35	-3	2 Storey	15	27	-12	1 Storey	59	60	-1
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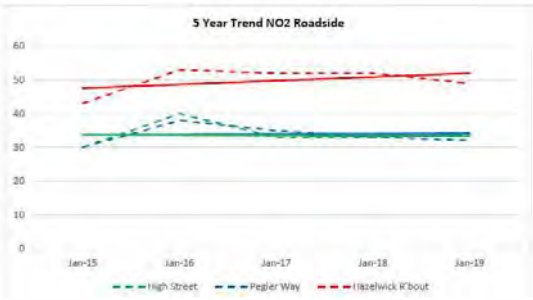
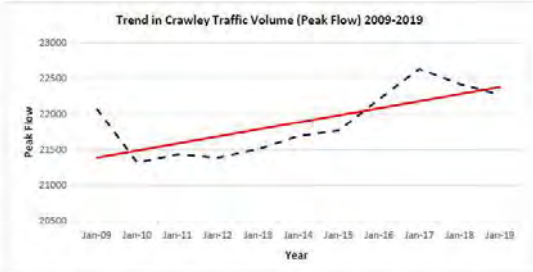
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			<p>The overall reduction is 12 dwellings, unfortunately these are all 2 storey dwellings that are the closest match to the surrounding area, making the latest proposal even further away from being in keeping with the current neighbourhood.</p> <p>To make things worse the latest plan increases the ugly and out of character 3 Storey dwellings by 4, replacing lower 2.5 and 1 storey building, again not in keeping with the local area.</p> <p>The new proposal loses 22 bedrooms across 12 dwellings, mostly in the 2 bedroom dwellings. In summary, the main loss from the new proposal are 12 x 2 bedroom, 2 storey houses. I suggest these are probably the most needed and popular for young families.</p> <p>The planner clearly doesn't understand the concerns of the local community and the objections raised by the councillors.</p> <p><u>4.0 Air Quality</u></p> <p>November 2014 Topic Paper 3 Housing Land Supply for the Crawley Borough Local Plan 2015-2030 was published.</p> <p>The extract below clearly shows those areas where housing will not be considered, you can see from the extract that 'Land which is significantly affected by poor air quality (within the proposed Air Quality Management Area at Tinsley Lane)' is excluded, specifically</p> <table border="1"> <tr> <td>3.) Land with designations preventing housing that will not be considered as part of the assessment (excluded)</td> </tr> <tr> <td>Land which is significantly affected by noise that would be unsuitable for residential development (66dBA) for significant development (100+ dwellings), 69dBA for developments of 99 units or less (including that land affected from a second wide-spaced runway option at Gatwick Airport).</td> </tr> <tr> <td>Land which is significantly affected by poor air quality (within the proposed Air Quality Management Area at Tinsley Lane)</td> </tr> <tr> <td>Land designated as Ancient Woodland and/or a Local Green Space.</td> </tr> <tr> <td>Land within the functional floodplain (Zone 3b) as identified in Crawley's Strategic Flood Risk Assessment (November 2013)</td> </tr> <tr> <td>Land within the area safeguarded from development for a second wide-spaced runway at Gatwick.</td> </tr> </table> <p>Extract From Homes England Design and Access Statement 10/05/221</p> <p>The layout needs to avoid locating new development within the Air Quality Management Area along the southern boundary.</p> <p>Both statements made in 2015 and 2021 are saying that the area within the AQMA should not be developed, in 2015 it specifically called out Tinsley Lane. The area for development falls within the Planning Application.</p>	3.) Land with designations preventing housing that will not be considered as part of the assessment (excluded)	Land which is significantly affected by noise that would be unsuitable for residential development (66dBA) for significant development (100+ dwellings), 69dBA for developments of 99 units or less (including that land affected from a second wide-spaced runway option at Gatwick Airport).	Land which is significantly affected by poor air quality (within the proposed Air Quality Management Area at Tinsley Lane)	Land designated as Ancient Woodland and/or a Local Green Space.	Land within the functional floodplain (Zone 3b) as identified in Crawley's Strategic Flood Risk Assessment (November 2013)	Land within the area safeguarded from development for a second wide-spaced runway at Gatwick.
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			<p>Pollutants Declared</p> <ul style="list-style-type: none"> 09/07/2015, Nitrogen dioxide NO2 - Annual Mean Hazelwick Air Quality Management Area (Crawley Borough Council) <p>09/07/2015, The Area outlined in red on the map attached to the Order is designated as the air quality management area. The designated area incorporates The land and properties bordering the Hazelwick Roundabout. The land and properties bordering both sides of the A2011, Crawley Avenue, between Junction 9 of the M23 and the Tushmore Roundabout. The land and properties bordering the Hazelwick Roundabout and the roundabout at Bycroft Way. The roads listed in Table 1 accompanying the map of the designated area.</p> <p>Below are copies of the Air Quality Management Orders issued in 2015 and 2021, clearly demonstrating that the air quality has not improved in 6 years, indeed the problem has got worse as the boundary has now been extended to Three Bridges. This view is supported by the 2020 Air Quality Annual Status Report as shown below'</p> <p>The additional vehicle movements generated by the proposed site, to and from the Hazlewick roundabout, will only add to the growing problem. Tinsley Lane, Tinsley Lane South, Tinsley Close and Harewood Close have all been named within the Management Order.</p> <p>Appendix A Draft Crawley Borough Council Air Quality Management Order 2021 Crawley Borough Council Environment Act 1995 Section 83 AIR QUALITY MANAGEMENT ORDER This order is made by Crawley Borough Council ("the Council") pursuant to section 83 of the Environment Act 1995. PRELIMINARY 1. The Council designated the Crawley Borough Council Hazelwick Air Quality Management Area by order dated 9 July 2015 ("the Hazelwick AQMA Order"). 2. It appears to the Council, as the result of its annual review and assessment of air quality, that the annual mean nitrogen dioxide objective as specified in the Air Quality Regulations 2000 is not being achieved within the area outlined in red on the plan in Schedule 1 which comprises the whole of the designated area under the Hazelwick AQMA Order and an area adjacent thereto.</p> 

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			<p>3. On 10 March 2021 the Council resolved to vary the Hazelwick AQMA Order to extend the designated area.</p> <p>VARIATION</p> <p>4. By this Order the Council varies the Hazelwick AQMA Order.</p> <p>5. The designated area under the Hazelwick AQMA Order is extended and shall include all the land and proper□es within the red line in the plan in Schedule 1 (“the Modified Designated Area”). A list of the roads within the Modified Designated Area are listed in Schedule 2.</p> <p>6. This order may be cited as the Crawley Borough Council Air Quality Management Area Order 2021, and shall come into effect on 11 March 2021.</p> <p>PERIOD FOR WHICH THIS ORDER HAS EFFECT</p> <p>7. This Order shall remain in force un□l it is varied or revoked by a subsequent order.</p> <p>The Common Seal of Crawley Borough Council was hereto affixed on the day of..... 2021</p> <p>Authorised Signatory</p> <p>Crawley Borough Council 2020 Air Quality Annual Status Report (ASR) In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management Executive Summary</p> <p>Air Quality in Crawley is mainly good, with national targets being met for all pollutants, with the exception of nitrogen dioxide (NO2) at a small number of locations alongside busy roads and within the AQMA, where the Council is targeting actions to improve air quality. A new site adjacent to the A23 London road also saw a borderline result with concentrations at, but not exceeding the 40 ug/m3 objective. This latest exceedance was based on incomplete yearly data and will be reviewed when a full year’s data is available at next year’s ASR to assess if a further amendment to the AQMA boundary is needed.</p> <p>The latest monitoring data showed NO2 levels remained more or less constant across Crawley in 2019. There was slight variation, with levels at airport and roadside sites marginally lower than 2018 levels (except in the AQMA), and background sites marginally higher than 2018 levels. This slight year on year fluctuation pattern was also seen regionally, and is likely to be attributable to climatic influences rather than local conditions. It is therefore more informative to look at the long term trends.</p> <p>The long term monitoring data for Crawley shows that concentrations of nitrogen dioxide have generally fallen throughout the borough since the mid-2000s, despite significant housing and commercial development over the same period. The only exception to this is within the AQMA where the long term</p>

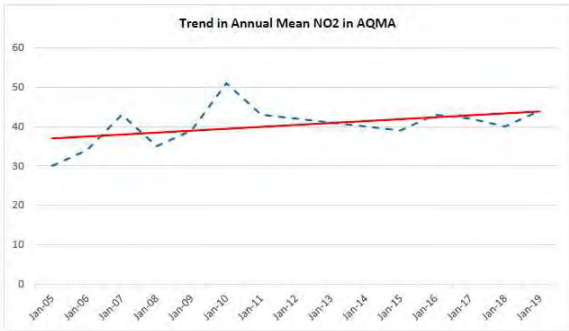
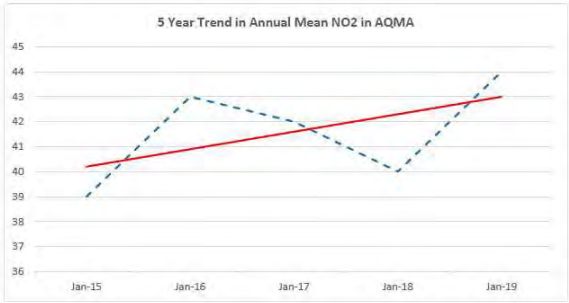
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			<p>trend continues to be upwards. The long term downward trend is driven mainly by cleaner engine technologies. However short-term (5yr) trend data, indicates that levels have remained broadly consistent at roadside, background and airport sites in more recent years as the rate of improvement slows. Increased development and traffic volumes may be a contributing factor in offsetting some of the improvements previously seen, however, it's too early to say if this plateauing is significant, or whether it is a result of the particularly low concentrations seen in 2015 skewing trends. The review and assessment process will continue to monitor year on year variation and report on them annually.</p> <p>As shown in Red, increased development and traffic volumes are a contributing factor and therefore should be considered in the context of any new development within the AQMA</p> <p>Actions to Improve Air Quality</p> <p>The draft local Plan 2020-2035 was published strengthening environmental policy and guidance through the development control process. Major development in and around Crawley will have a cumulative impact on air quality and therefore it is important that new development meets the requirements of planning policies and guidance in relation to air quality.</p> <p>See extracts from the 2020-2035 Draft Local Plan below. The proposed planning application does not meet the policy</p> <p>Conclusions and Priorities</p> <p>In 2019 there were no exceedances of the objectives for PM10 pollution, or the hourly objective for nitrogen dioxide. The annual mean objective for NO2 was met at all sites except within the AQMA where exceedances were measured at sites close to busy roads at the A2011, and the A2220 commuter corridor into Three Bridges station.</p> <p>The council's specific priorities for the coming year include:</p> <p>Formally declare the extension to the existing AQMA boundary to incorporate the new area around Three Bridges railway station.</p> <p>update air quality modelling and source apportionment for the AQMA to help inform the revision of the current Air Quality Action Plan</p> <p>Update the AQAP to reflect the extension of the AQMA boundary and any specific measures relating to the new area.</p> <p>Trends in Roadside NO2 in Crawley</p> <p>The short-term (5yr) trend is only slightly downwards for roadside NO2, and the trend at the Hazelwick roundabout (within the AQMA) is still upwards. This short-term upward trend may be influenced by a number of factors including increased traffic volumes on local roads, or the effect of low(er) levels in 2014/15 which have skewed the trend upwards in the following years. The trend will continue to be monitored and reviewed annually through the LAQM process</p>

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			<p data-bbox="786 276 853 293">Fig 3.3a</p>  <p data-bbox="786 679 842 697">Fig 3.4</p>  <p data-bbox="768 1023 1227 1050">Trends in Background NO2 in Crawley</p> <p data-bbox="768 1050 2029 1262">Fig 3.5 shows the downwards long term trend in NO2 at background sites is similar to that of other sites (roadside and airport) across Crawley, confirming that background levels of NO2 have been falling over the last 15years. The steeper downward slope indicates greater improvement in air quality at background sites over the last decade than those close to busy roads around Crawley and the airport. This helps demonstrate the contribution vehicle emissions make to poor air quality at roadside locations and supports the argument for restricting residential development close to busy roads.</p> <p data-bbox="768 1267 2002 1356">Fig 3.5a shows the short term (5 year) trend. The trend is downwards, but, compared to the long-term trend, the rate of improvement is beginning to slow. This may be associated with increased development and traffic volumes in the borough, but climatic factors may be more relevant, with the particularly low</p>


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			<p>concentrations in 2014/15, followed by higher 2016 levels influencing the short term trend. The trend will continue to be monitored and reviewed annually through the LAQM process.</p> <p>As above in red, supports the argument for restricting residential development close to busy road, the proposed development is adjacent to the busiest road in Crawley. Why is this planning application still going ahead</p> <p>Trends in AQMA NO2 in Crawley</p> <p>Although the trend for background and roadside sites in Crawley is down, this is not seen at receptor sites within the AQMA where both the long term and short term data is still showing an upwards trend (Fig 3.6 and Fig 3.6a). The impact of major development (2000 dwellings) adjacent to the AQMA continues to be monitored. The council is not in a position revoke or reduce its AQMA boundary, and is currently going through the process of extending its AQMA to incorporate the Three Bridges area where exceedances were identified last year at two locations with relevant exposure (CR93 and CR97).</p> <p>Monitoring of the development of 2000 dwellings is required adjacent to the AQMA, the 138 dwelling proposed in this application are partly in the AQMA and adjacent.</p>

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			<p>Fig 3.6</p>  <p>Fig 3.6a</p>  <p>Crawley Borough Local Plan 2020 – 2035 January 2020 Air Quality 16.41 Crawley is generally a clean urban borough, 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 (NO2) at a small number of locations including the designated Hazelwick Air Quality Management Area (AQMA) along the A2011 at Crawley Avenue and surrounding areas¹³⁹. A key contributor to poor air quality in these areas is emissions from all types of vehicles along busy roads and commuter routes. As previously stated the addition of significant vehicle movements is going to contribute to the already growing problem.</p>

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			<p>16.42 In addition to traffic, air quality can be affected by a number of pollutant sources, including industrial, commercial and domestic.</p> <p>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 consumption is not unintentionally detrimental to local air quality.</p> <p>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.</p> <p>16.43 Therefore, it is vital that the maintaining 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).</p> <p>The section in red is self explanatory and questions why you would build within or close to and area with poor air quality.</p> <p>Strategic Policy EP5: Air Quality</p> <p>People's health, quality of life and wider environment shall be protected from the significant adverse effects of atmospheric pollution.</p> <p>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.</p> <p>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.</p> <p>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:</p> <ol style="list-style-type: none"> an Emissions Mitigation Statement is required as part of a planning application; an Air Quality Impact Assessment is required as part of a planning application. <p>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 the 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.</p>

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			<p>Planning permission will only be granted where it:</p> <ul style="list-style-type: none"> i. can be demonstrated that air quality has been appropriately factored into the location, design and operation of development, and where necessary, appropriate mitigation provided; 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. <p>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. The proposed application contravenes at least 4 of the statements that would mean planning permission will not be granted as shown in red..</p> <p>5.0 Trees and Wild Meadow The tree impact document shows the potential loss of 17 trees and a further 19 at risk. I have personally surveyed the areas in question and have counted over 250 trees of varying diameters that would need to be removed in order to relocate Oakwood Football and provide adequate parking. A further 50 will probably need to be removed to accommodate the housing in the Southern and Central areas. I cannot understand how your survey has only picked up 36 trees in total, below are photos of the areas where the football pitches and car park are going to be located alongside the residential area.</p>

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			 <p>Strategic Policy DD5: Tree Replacement Standards</p> <p>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:</p> <ul style="list-style-type: none"> 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.

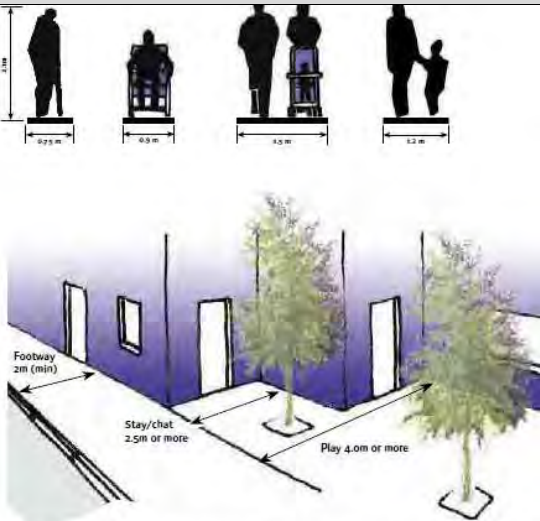
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			<p>Where development proposals would result in the loss of trees, applicants must identify which trees are to be removed and replaced in order to mitigate for the visual impact resulting from the loss of the tree canopies. Proposals must demonstrate that the number of replacements accords with the following requirements:</p> <table border="1"> <thead> <tr> <th data-bbox="770 405 1196 458">Trunk diameter of each tree (measured in cms at 1.5m above ground level) to be removed:</th> <th data-bbox="1218 405 1532 427">No. of replacement trees required:</th> </tr> </thead> <tbody> <tr> <td data-bbox="770 458 1196 480">Less than 19.9</td> <td data-bbox="1218 458 1532 480">1</td> </tr> <tr> <td data-bbox="770 480 1196 502">20 – 29.9</td> <td data-bbox="1218 480 1532 502">2</td> </tr> <tr> <td data-bbox="770 502 1196 525">30 – 39.9</td> <td data-bbox="1218 502 1532 525">3</td> </tr> <tr> <td data-bbox="770 525 1196 547">40 – 49.9</td> <td data-bbox="1218 525 1532 547">4</td> </tr> <tr> <td data-bbox="770 547 1196 569">50 – 59.9</td> <td data-bbox="1218 547 1532 569">5</td> </tr> <tr> <td data-bbox="770 569 1196 592">60 – 69.9</td> <td data-bbox="1218 569 1532 592">6</td> </tr> <tr> <td data-bbox="770 592 1196 614">70 – 79.9</td> <td data-bbox="1218 592 1532 614">7</td> </tr> <tr> <td data-bbox="770 614 1196 636">80+</td> <td data-bbox="1218 614 1532 636">8</td> </tr> </tbody> </table> <p>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 planning. The approach would enable the green character and appearance of the borough to be maintained through tree planting on appropriate and available land.</p> <p>The Manor Royal Design Guide SPD sets out tree planting requirements for sites in Manor Royal. In addition to the loss of trees the wild meadow located in the northern section will also be lost along with plants insects and wildlife in direct conflict with the Environment Bill 2020, extracts shown below.</p> <p>Environment Bill 2020</p> <p>Habitats restored, created and brought into management for biodiversity on land and in Freshwaters</p> <p>We want to increase the amount of good-quality habitat for wildlife in England. Many of our wetlands, woodlands, grasslands and coastal habitats have been lost. While losses have slowed, many natural and semi-natural habitats are in poor condition and getting worse due to past land use and ongoing pressures such as grazing, burning, and poor water and air quality. Patches of habitat are also often very fragmented, isolated and too small to sustain thriving communities of species into the future. The historical data we have on species abundance and distribution consistently link species loss with habitat loss or degradation. Where habitat is restored, species respond, and the flow of wider ecosystem services increases.</p> <p>In the 25 Year Environment Plan we committed to create or restore 500,000 hectares of wildlife-rich habitat outside of protected sites, as part of a Nature Recovery Network, to complement and connect our best</p>	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
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			<p>wildlife sites. We said that recovering biodiversity will require more habitat, in better condition, in bigger patches that are more closely connected, in line with Lawton principles [footnote 8]. As noted above, the Environment Bill lays the foundation for the Nature Recovery Network that will complement plans for a new Environmental Land Management scheme. However Improving woodland cover, there is more to do to restore and create habitats, outside protected sites, to help meet our 25 Year Environment Plan commitment.</p> <p>Trees and woodland are critical to supporting our national commitment to reach net zero emissions by 2050, as one of the most cost-effective nature based solutions to climate change. Trees and woodlands also have a critical role to play in recovering nature and promoting biodiversity, supporting our long-term vision set out in the 25 Year Environment Plan.</p> <p>Government is therefore committed to expanding and managing our woodlands to deliver the multiple environmental, social and economic benefits trees can offer, including a manifesto commitment to increase tree planting across the UK to 30,000 hectares of trees per year by 2025.</p> <p>Rather than cutting down and removing the trees we should be looking to maintain and add to them rather than building more houses and generating more pollution.</p> <p>6.0 Birch Lea Access</p> <p>6.1 Vehicle Movements</p> <p>The original plan stated peak vehicle movements of 83 am and 84 pm, this has reduced to 76 am and 77 pm a small negligible reduction circa 9%, not the 10% stated in the Design Statement.</p> <p>In reality these numbers do not align with the national averages and averages for the South East as defined by government statistics.</p> <p>According to the plan, there is parking allocation for 232 vehicles. The average movement per day according to government statistics are 1.1 per vehicle</p> <p>On this basis I would expect movements to be nearer the 255 per day and not as described in the plan only 153 at peak times.</p> <p>The remote location of the proposed development with limited immediate access to facilities will require people to utilise their cars.</p> <p>Taking the average number of vehicles per household for the South East as published by government 1.41 and the average movements this reduces the daily movement to 215 per day.</p> <p>To get the full picture the additional journeys by parcel delivery drivers, food delivery drivers, refuse collection, taxi's, maintenance and trades people, visitors, care workers and council staff to maintain the open spaces all should be added to the count.</p> <p>For Example: Parcel Deliveries.</p> <p>The average number of parcel deliveries per person per year in the UK is 57. For this development based on the national average of 2.39 people per household, this equates to $138 \times 2.39 = 330$ People. $330 \times 57 =$</p>

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			<p>18,799 Deliveries. One in and one out equates to 37,598 vehicle movements through Birch Lea per year or 103 per day. This number is expected to double by 2026 to 206 per day.</p> <p>Takeaway Deliveries</p> <p>The average number of takeaway deliveries per person is 34 per annum. $138 \times 34 = 4692$. One journey in and one out equates to 9384 vehicle movements through Birch Lea or 26 per day. Total Movements per day $215+103+26 = 343$, average of one vehicle every 2.8 minutes for 16 hrs a day, increasing to at least 446 by 2026 or an average of one vehicle every 2.2 minutes. This excludes groceries, trades people, taxi's etc.</p> <p>Clearly a major issue for a small cul de sac never designed for this level of traffic and in particular a significant number of larger delivery vehicles.</p> <p>6.2 Footpath and Pedestrian Safety</p> <p>The revised plan has increased the risk to pedestrians and cyclists and created more safety issues than the previous plan and has ignored Government advice with regards pedestrians. Even more serious considering the estimated number of vehicle movements up and down Birch Lea.</p> <p>See below extracts from the Department of Transport 'Inclusive Mobility' and 'Manual for the Streets' and 'IDGO Inclusive Design for Getting Outdoors (IDGO) 'The Design of Streets With Older People In Mind'.</p> <p>I have highlighted the pertinent sections to draw your attention to the issues.</p> <p>Manual for the Streets Ministry of Transport</p> <p>"2.7 Disability discrimination</p> <p>2.7.1 Highway and planning authorities must comply with the Disability Equality Duty under the Disability Discrimination Act 2005.¹⁶ This means that in their decisions and actions, authorities are required to have due regard to the six principles of:</p> <ul style="list-style-type: none"> • promote equality of opportunity between disabled persons and other persons; • eliminate discrimination that is unlawful under the 2005 Act; • eliminate harassment of disabled persons that is related to their disabilities; • promote positive attitudes towards disabled persons; • encourage participation by disabled persons in public life; and • take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons. <p>2.7.2 Those who fail to observe these requirements will be at the risk of a claim. Not only is there an expectation of positive action, but the duty is retrospective and local authorities will be expected to take reasonable action to rectify occurrences of non-compliance in existing areas.</p> <p>2.7.3 The Disability Rights Commission (DRC) have published a Statutory Code of Practice on the Disability Equality Duty and they have also published specific guidance for those dealing with planning, buildings and the street environment.</p>

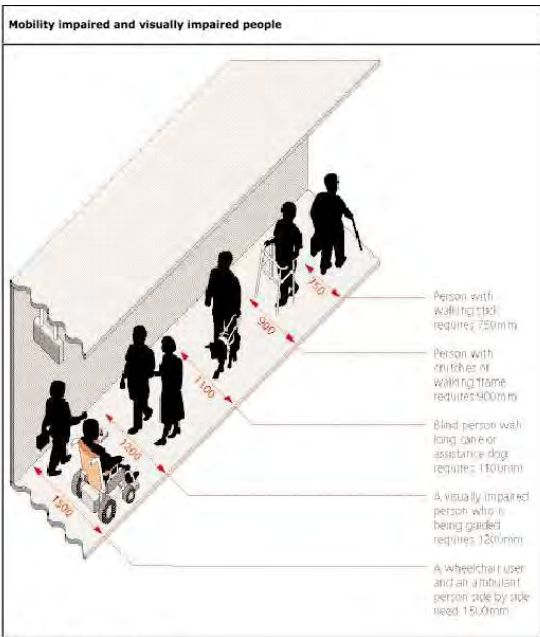
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			 <p data-bbox="792 810 1308 842">Figure 6.8 The footway and pedestrian areas provide for a range of functions which can include browsing, pausing, socialising and play.</p> <p data-bbox="768 890 2029 948">6.3.20 Inclusive Mobility gives guidance on design measures for use where there are steep slopes or drops at the rear of footways.</p> <p data-bbox="768 954 1973 1011">6.3.21 Places for pedestrians may need to serve a variety of purposes, including movement in groups, children's play and other activities (Fig. 6.8).</p> <p data-bbox="768 1018 2029 1165">6.3.22 There is no maximum width for footways. In lightly used streets (such as those with a purely residential function), the minimum unobstructed width for pedestrians should generally be 2 m. Additional width should be considered between the footway and a heavily used carriageway, or adjacent to gathering places, such as schools and shops. Further guidance on minimum footway widths is given in Inclusive Mobility.</p> <p data-bbox="768 1171 2029 1257">6.8.13 The design of new developments should not require waste bins to be left on the footway as they reduce its effective width. Waste bins on the footway pose a hazard for blind or partially sighted people and may prevent wheelchair and pushchair users from getting past.</p> <p data-bbox="768 1264 1290 1289">Inclusive Mobility - Department of Transport</p> <p data-bbox="768 1295 1173 1321">2 Basic human factors information</p> <p data-bbox="768 1327 943 1353">2.1 Definitions</p>

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			<p>It is essential that design for people with mobility impairments should be to the highest possible standards. This requires knowledge of the capabilities of different types of person.</p> <p>This section provides information on the basic human requirements for ease of movement. In designing or modifying facilities the aim should be to be generous in the allocation of space.</p> <p>The term disability is a broad one. It includes people with physical, sensory or mental impairment; at a conservative estimate between 12 and 13 per cent of the population have some degree of impairment. Many, though not all, face barriers to movement in the environment. This guide is intended to show how these barriers can be removed or at least reduced, but it does have a wider relevance because there are many other people not conventionally considered to have a disability who also encounter barriers to movement.</p> <p>People with small children, people carrying heavy shopping or luggage, people with temporary accident injuries and older people can all benefit from good design of the pedestrian and transport environment.</p> <p>Without a barrier free environment, many of these people will be mobility impaired.</p> <p>While it is true that there are many aspects of design in the pedestrian environment that are helpful to all or most disabled people (and many others as well) there are also some specific facilities needed by people with a particular kind of impairment.</p> <p>Manual wheelchair users need sufficient space to be able to propel the chair without banging their elbows or knuckles on door frames or other obstacles. But someone who walks with sticks or crutches also needs more space than a non-disabled walker; so too does a long cane user or person carrying luggage, or a lot of shopping bags, or with small children. Thus providing adequate clear space on pavements, along passages in public buildings, through doorways etc, is of benefit to many people.</p> <p>The DDA defines a person as having, a disability if he has a physical or mental impairment which has a substantial and long term adverse effect on his ability to carry out normal day-to-day activities.</p> <p>There are various ways or models used to define disability, but in functional terms this guide is mainly concerned with the following:</p> <p>Locomotion, which includes people who use wheelchairs and those who can walk but only with difficulty often using some form of aid such as a stick or walking frame. Approaching 70% of disabled people have locomotion difficulties: those with walking difficulties outnumber wheelchair users by about 10:1.</p> <p>Seeing, which can be sub-divided into blind and partially sighted people. It is estimated by the Department for Work and Pensions (DWP) that there are almost two million people in Great Britain with a significant sight loss.</p> <p>Hearing, which can also be sub-divided into those who are profoundly deaf and those with impaired hearing, ranging from severe to mild deafness. The Royal National Institute for Deaf People (RNID) estimates that there are over eight million deaf or hard of hearing people in the UK of whom approaching 700,000 are severely or profoundly deaf.</p>

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			<p>Reaching, stretching and dexterity, frequently the result of arthritis, which can make these movements painful and difficult, or of muscular dystrophy causing a loss of muscular strength, or of complaints of the nervous system.</p> <p>Learning disability, making it hard to understand complicated information or to use complex machines (like some ticket machines). It should be remembered that these categories are not mutually exclusive.</p> <p>Many disabled people, particularly older people, have more than one impairment. The following paragraphs give some basic information on the space needed by people when they are standing or moving. Of course there is a lot of variation in this, but if the dimensions given below are used then the great majority of disabled people will be able to move around buildings and the environment much more easily.</p> <p>2.2 Mobility impaired and visually impaired people</p> <p>Someone who does not use a walking aid can manage to walk along a passage way less than 700mm wide, but just using a walking stick requires greater width than this; a minimum of 750mm. A person who uses two sticks or crutches, or a walking frame needs a minimum of 900mm, a blind person using a long cane or with an assistance dog needs</p>


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			<p>1100mm. A visually impaired person who is being guided needs a width of 1200mm. A wheelchair user and an ambulant person side-by-side need 1500mm width.</p>  <p>2.3 Wheelchair users</p> <p>3 Footways, footpaths and pedestrian areas</p> <p>The distinction between a footway and a footpath is that a footway (usually called the pavement) is the part of a highway adjacent to, or contiguous with, the carriageway on which there is a public right of way on foot. A footpath has no contiguous carriageway. Where reference is made to one, it can generally be regarded as applying to the other for design purposes.</p> <p>3.1 Widths</p> <p>A clear width of 2000mm allows two wheelchairs to pass one another comfortably. This should be regarded as the minimum under normal circumstances. Where this is not possible because of physical constraints 1500mm could be regarded as the minimum acceptable under most circumstances, giving sufficient space for a wheelchair user and a walker to pass one another. The absolute minimum, where there is an obstacle, should be 1000mm clear space. The maximum length of restricted width should be 6 metres (see</p>

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			<p>also Section 8.3). If there are local restrictions or obstacles causing this sort of reduction in width they should be grouped in a logical and regular pattern to assist visually impaired people.</p> <p>Inclusive Design for Getting Outdoors has also conducted academic research and found the following results:</p> <p>About I'DGO</p> <p>Inclusive Design for Getting Outdoors is the brainchild of three academic research centres, working as a multi-disciplinary consortium, supported by a wide range of partners in industry, government and advocacy. The researchers are based in Edinburgh, Warwick and Salford, but engage in fieldwork throughout the UK and beyond.</p> <p>THE DESIGN OF STREETS WITH OLDER PEOPLE IN MIND</p> <p>Widths of footways and footpaths</p> <p>This design guide provides information on the most suitable widths of footways taking account of numbers of pedestrians and their safety when using the footpath; the effective positioning of permanent features such as trees and bus shelters; and the preferences and needs of older people who use the footway with a variety of mobility aids such as walking sticks and scooters.</p> <p>Context</p> <p>Footways and footpaths should be designed so that they provide safety for pedestrians from traffic. The Department for Transport Manual for Streets (2007) confirms that there is no minimum width for footways. It suggests that in lightly used streets, the minimum unobstructed width for pedestrians should generally be 2000mm, and that in areas of higher pedestrian flow the quality of the walking experience can deteriorate unless sufficient width is provided. Inclusive Mobility (2002) advises that ideally the width of the footway should be 2000mm to facilitate two people in wheelchairs to pass each other comfortably.</p> <p>What older people tell us they prefer and why</p> <p>Very few participants (16%) feel comfortable with using narrow footways. Typical reasons for this are:</p> <p>"You have to go on the roadway to get passed people on narrow pavements"</p> <p>"You can't stop and talk to anyone because people can't get by, especially those with buggies"</p> <p>"I have to take it steady and hope that people are polite enough to walk around me"</p> <p>Participants find temporary obstacles to be both a nuisance and hazard:</p> <p>"Parking on pavements is a problem. Sometimes you have to walk on the road to pass parked cars"</p> <p>"I have to drive my mobility scooter on the road because pavements are blocked by parked cars. Riding a scooter on the road is unsafe"</p> <p>"...it can be a marathon for frail people and those with walking sticks to get around them [temporary building works]"</p> <p>"Many people park their cars on the pavement, they even drive on the pavement"</p> <p>Most participants (79%) much prefer wider uncluttered footways. Typical reasons for this are:</p> <p>"I feel safer from cars on wider pavements"</p>

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			<p>"I'm less likely to bang into people or things with my walker on wider pavements" "I need room for my scooter and so that other people can get past me safely"</p> <p>Recommendations Whilst most footways were originally designed to provide minimum requirements, the subsequent poor positioning of permanent features has meant a significant reduction in the effective width of the footway. It is recommended that:</p> <ul style="list-style-type: none"> • Footways in new developments are designed to minimum width standards of • 2000mm to include the diverse needs of users; • Clear design information is provided on the positioning of permanent obstacles such that minimum widths of footways are maintained; • Personal safety of pedestrians is prioritized such that temporary obstacles on footways are discouraged; • The parking of cars on pavements should be discouraged <p>The Extracts above demonstrate that the design for Birch Lea does not meet the minimum standards recommended by the Department of Transport's Manual for the Streets and Inclusive Mobility documents and do not follow the recommendations from the Inclusive Design for Getting Outdoors.</p> <p>In the latest plan for Birch Lea one of the footpaths has been removed, leaving a single footpath of 1.8m. The previous plan included dual footpaths one ranging from 2.6m to 2.1m with a pinch point below the minimum standard of 1.6m. This footpath has been removed and the plan now relies on a single footpath of 1.8m which is the absolute minimum standard, but not the recommended. This does not allow for a mix of wheelchair users, mobility scooter users, pedestrians with shopping, pedestrians with prams, pedestrians with dogs on a lead, pedestrians with walking aids to pass safely on a single footpath, forcing pedestrians into the road.</p> <p>The added risk in Birch Lee is the necessity to cross multiple driveways where cars could be reversing or entering a property and the poor visibility around a blind bend.</p> <p>The Government's Inclusive Mobility advice states a clear width of 2000mm allows two wheelchairs to pass one another comfortably. This should be regarded as the minimum under normal circumstances. The proposed 1800mm is below the minimum and would not allow for Wheelchair/ mobility scooter users to pass pedestrians with walking sticks or other mobility aids safely.</p> <p>With a significant increase in dog ownership during COVID in the lane, the only access to open space will be via Birch Lea and a narrow pavement, creating problems for the dog owners and pedestrians passing each other, forcing them into the road, significantly more difficult for parents with buggies, wheelchair and mobility scooter users. The only other access point via Kenmara Court doesn't show any pedestrian access or associated footpaths and therefore cannot be considered as a safe access point for pedestrians to Tinsley Lane.</p>

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			<p>Weekly, on bin collection day, the footpath can be furthered narrowed unintentionally by bins being left out for collection and not returned to driveways after emptying. The photos below show a recent example on a quiet day showing at least 7 bins in this short piece of footpath, this would be further increased when the recycling bins are collected every other week.</p>  <p>The revised proposal contravenes your own planning guidelines in two key areas: Provides a safe and secure environment for its residents and visitors; Create public spaces and routes that are attractive, safe, uncluttered and which work effectively for all in society, including disabled and elderly people;</p> <p>6.3 Residents Quality of Life and Disturbance This development will have a significant impact on residents of Birch Lea whose life choices have been to locate to a quiet cul de sac with no passing traffic, if approved this development would create a completely unacceptable increase in the level of traffic, associated noise and reduction in air quality. The narrow pavements will increase the risk to pedestrians and reduce their levels of safety. Those residents backing onto the development will have a rural outlook replaced by houses and an enclosed compound style barrier of 3 storey apartment blocks instead of natural fields and trees. The same residents will be overlooked and lose their privacy. For the duration of any build, probably 2-3 years residents will suffer from noise, dust and significant disturbance.</p> <p>7.0 General Issues</p>

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			<p>Parking at Oakwood Football Club has significantly increased and caused problems for residents and Users alike, see photos below, this situation has occurred on multiple occasions during recent months. Those attending the football club were unable to park and couldn't find spaces. The parking proposed for the new facility will not be adequate based on the recent experiences of local residents and will lead to overspill into the surrounding area. One of the concerns raised during the last application.</p>  <p>The Tinsley Lane Development Brief states that (page 29): The development site at Tinsley Lane is located in an area where parking provision is in limited supply. Demand for parking within Manor Royal Business District has a knock-on effect on surrounding residential streets where there is significant pressure for parking spaces, often causing problems for local residents. The proposed Manor Royal Parking Management Plan will drive more parking to Tinsley lane through increased restriction proposed in Manor Royal</p> <p>Economic Viability Below is an extract from the Planning Statement covering the 2018 Planning Application. The statement indicates that anything less than 150 units could call into question the viability of the development scheme. Does 138 units make the scheme not economically viable? Homes England's argument that the number of 150 homes is needed for viability and to buy out existing leaseholders supports the view that less than 150 ie 138 is not economically viable. If this is the case, 150 was rejected and 138 is not economically viable the planning application should not even be submitted as it untenable.</p> <p>4.1 The Development Plan Crawley Borough Local Plan (2015 – 2030) The delivery of up to 150 units enables a viable development scheme whilst also ensuring delivery of the required housing mix and parking standards can be achieved.</p>

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			<p>Unused buildings and accommodation government plan</p> <p>The plan submitted is only illustrative I am therefore unable to comment directly on that plan other than to say that access to the open spaces has been afforded to the residents for over 22 years and I would expect this access to continue in any future plans. There are many areas that are subject to detailed planning which are not addressed at this stage that need to be, in order to make the correct planning decision Crawley Council will have assets transferred, at what cost to the council tax payer and the on-going maintenance running costs? Will the council be able to afford the maintenance after the economic impact of COVID, they struggle to maintain the existing area as shown by the photo earlier.</p> <p>I have to question the timing of the plan re submission, a plan that has already been rejected, with the Country recovering from a pandemic, in the middle of a cost of living crisis, many people struggling with their mental health and financial difficulties, why add to their burden by brining this Planning Application up once again at the worst possible time People are stressed enough without the Council bringing this back to the table I find the whole thing distasteful, insensitive and thoughtless on those who pay for your services. Anyone in the local area needing to down size due to financial difficulties will find selling their house impossible whilst you continue to force this Planning Application through, in an area that is clearly not suited to this development.</p> <p>I suggest the proposal contravenes your own planning guidelines and Government advice in numerous areas and therefore the Planning Application should be rejected.</p> <p>In the revised proposal I'm not able to see what significant improvements have been made that would address the issues raised by the Counsellors and enable them to change their mind and accept any plan in relation to the access through Birch Lea and housing density. If anything, the revised proposal has made the Birch Lea access point even less desirable on safety grounds.</p> <p>1. The proposed density of the development is out of character with the existing local housing in the area and the Local Planning Authority is not satisfied that the level of housing proposed would result in a good standard of residential amenity for future residents, contrary to policies CH3 and CH5 of the Crawley Borough Local Plan and the Urban Design Supplementary Planning Document.</p> <p>The revised density is not materially different from the planning application that was rejected and therefore should also be rejected.</p> <p>2. The Local Planning Authority considers that the proposed intensification in use of Birch Lea to serve up to an additional 150 dwellings would cause unacceptable harm to the residential amenity enjoyed by existing residents of the cul-de-sac contrary to policy CH3 of the Crawley Borough Local Plan.</p> <p>The rejection statements still holds true for the residence of Birch Lea, the changes to the planning application still do not address the unacceptable harm to the residential amenity.</p> <p>As a reminder, courtesy of the Crawley Observer, I have summarised the outcome of the last Planning Application meeting below:</p>

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			<p>One of the main sticking points was the plan to use the narrow, ten-home cul-de-sac of Birch Lea as one of two access roads, the other being via Kenmara Court.</p> <p>Ian Irvine (Lab, Broadfield) said using Birch Lea would affect the quality of life of those residents and called on Homes England to come up with a better idea.</p> <p>Liam Ascough (Con, Gossops Green & North East Broadfield) agreed. He said: "I do agree we obviously need more housing in Crawley – however I disagree when it's a detriment to existing residents. "Birch Lea will be too difficult and will cause too many issues for the residents living there now."</p> <p>Another concern was the sheer number of homes involved.</p> <p>Crawley's Local Plan originally said the site could take 138 homes but this was reduced to 120 by the Local Plan Inspector, who was not convinced there would be enough space for the football club.</p> <p>The number of homes – and the fact that some would be three storeys high – was an issue for many of the people who wrote to the council objecting to the plans.</p> <p>In a statement read to the committee, the Tinsley Lane Residents' Association accused Homes England of wanting to 'cram' homes onto the site, adding: "A high density development of three-storey terraces is not in keeping with the bungalows and family houses in the vicinity."</p> <p>With no shops or public transport nearby, the committee was not convinced by the claim from the highways team that only 83 cars would leave the new development each morning.</p> <p>The application was rejected unanimously and so should this latest attempt.</p> <p>Suggested Modification:</p> <p>Remove the Proposed Development to the East of Tinsley Lane as it is not a viable option and does not comply with Council and Government Guidelines.</p> <p>Retain the existing Sports Facilities and allow Oakwood Football Club to continue to develop the diversity it is pioneering in the area for youth and women's football development.</p>
REP/153	Resident 61	H2 – Tinsley Lane	<p>In the current SLAA this site is designated for 120 dwellings including affordable provision with a retention and relocation of the leisure facilities provided presently by Oakwood Football Club. The site is owned by Homes England a UK Government Agency. There are various formal and informal tenure arrangements.</p> <p>Access to the site for vehicles in a redevelopment scheme is cited as via the cul-de-sac Birch Lea. Current access is via Kenmara Court and a small unmade up lane leading to the Football ground. The site over 40 years has been the subject of schemes, most recently for 150 dwellings which was refused in Outline in 2020 due to high density of dwellings, unsubstantiated Road Safety Audit details concerning access and the lack of an acceptable strategic water neutrality plan.</p> <p>The designation of this site as suitable for a small residential development scheme has meant that nothing has happened of any community or local sustainability benefit since the original New Town siting as Sports facilities were closed in the 1980's. The site sits idle and with little medium-term chance of change.</p>

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			<p>Suggested Modifications: The site's designation as a Residential development site should be suspended. The site should be the subject of a review to consider redesignation as wholly for Leisure and Community Uses. The site's potential for Leisure Use should be considered in line with the overall provision of Football Pitches within Crawley as a result of the expansion of population through major local and regional Residential development. The increased need of facilities for school sport within easy reach of Schools with limited provision of playing fields. The site thus redesignated could be transferred to Crawley Brough Council to manage on behalf of the community in line with its historic purpose supporting the health and wellbeing of the population.</p>
Rep/155	Resident 62	H2 – Tinsley Lane	<p>The development of the land East of Tinsley Lane (page 69 of the plan) will destroy what has traditionally been a comparatively quiet leafy lane. The proposed access to any development from any of the closes off Tinsley Lane, which are all too narrow for such a purpose in any case, would put excessive strain on the local infrastructure and would be intolerable for anybody living there now, or in the future, in terms of volume of traffic and congestion and would be highly detrimental to their safety and mental health. The existing sports fields have always provided an opportunity for the town's inhabitants, including many children, to play sports and to exercise and to lose this amenity would be appalling and short-sighted. Once gone they could never be replaced.</p> <p>Suggested Modifications: I would want to see this area removed from the plan as a possible area for housing. Clearly with developments at Forge Wood and other areas around Crawley, which have already destroyed large swathes of countryside, it makes sense to develop those areas further rather than infill current green spaces in the town.</p>
REP/157	Resident 64	H2 – Tinsley Lane	<p>Myself, my family and other residents have made it abundantly clear that this development is not feasible. The fact it keeps coming up is beggars belief.</p> <p>Here are the key points to my objection and all the comments I have made previously still stand. - Privacy/Noise/Design/Access. ALL THE THINGS I HAVE OPPOSED BEFORE. Birch Lea is a cul de sac that is not suitable for use as a main access road for such a development. The road has a major kink and even the proposed widening would allow limited visibility. 100+ homes would represent traffic that the local roads are not designed to cope with, Tinsley Lane included. The headlights coming up the road are bearable in a cul de sac but would not be acceptable if used as a main road. Would I be allowed to put up a 6ft perimeter fence? under current planning the answer is no!! My wall is currently hit numerous times each year with cul de sac traffic. As a main road what is the guarantee of safety in me using my garden which borders the road? The proposed access via Birch Lea is also too narrow to cope with the traffic generated</p>

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			<p>by such a large number of houses without causing danger to pedestrians and to residents exiting their drives.</p> <ul style="list-style-type: none"> - Loss of recreational space - Oakwood represents some of the already limited space available for recreation in Crawley. The space allowed for Oakwood however is not sufficient for it to continue in its present size and would result in several of its boys and girls youth teams having nowhere to play. With new developments planned or under construction in Forge Wood, Pease Pottage, Kilnwood Vale, the town centre and Ifield golf course the demand for recreational space is even greater than when the Local Plan was first prepared and once our sports fields are lost they will never be recovered. My own, and my neighbours previous comments on application CR/2018/0544/OUT still stand today. This development is not feasible and the proposed benefits are a farce. My house is a 25 minute walk from Three bridges station and 15 minutes from the nearest bus stop, I would not deem that convenient in the slightest. People moving in to the new development would certainly not find that convenient meaning only one thing - a massive increase in road traffic that the roads are NOT built for. I would like to see time and energy spent on feasible proposals around the town and not just "oh there's some football pitches we can develop". Quite frankly myself and my neighbours are fed up of this year in year out - it is a waste of valuable resources and everybody's time. Yes we need housing BUT we need to do provide it in the right way. Thanks for considering this comment on all residents at Birch Lea and the Tinsley Lane Residents Association <p>Comment on application CR/2018/0544/OUT Many thanks for your notification of the Planning Application for Access through Birch Lea.</p> <p>I have objections to the plans on numerous accounts and am in support of the objections put forward by my neighbours in Birch Lea and also the Tinsley Lane Residents association.</p> <p>My neighbour KH at number Birch Lea has mentioned the following, and I would like to echo my support: "The Plan omits the positions of the drive exits, of number and Birch Lea (BL). As raised previously, there is a serious safety issue in exiting those. An exiting driver cannot see cars or motorcycles coming up from Tinsley Lane before driving out onto their road space Having to rely for ones safely on other drivers, of cars and motorcycles, is an unusual practice. A driver entering a main road serving a 150 house community, would normally expect to be able to see that it is safe to do so. The distance away that an up-coming driver could begin to see an exiting car, that is already at the end of the 1.8 metre verge and also at the edge of the roadway, is 19.5m. At 30mph the rate of travel is 13.4 metres per second. Thus the 19.5m is traversed in 1.5seconds and in 2.2 seconds at 20mph.</p>

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			<p>The same distance is measured from both drives, due to the road curvature.</p> <p>The data used to position the up-coming driver's eyes in the centre half of the upcoming roadway, are as on the submitted plan. Namely there will be a 1.9 metre verge from the wall and then a total road width of 5.9 metres after that. That will also do for a motorcyclist. The modified road will encourage residents to use hedges, fencing, a taller brick wall etc. to get privacy."</p> <p>I will base my objection around the points that I am able to comment on as per your letter:</p> <ol style="list-style-type: none"> 1. Privacy – I moved my family to Birch Lea on the basis I was moving to a quite private cul de sac. Using the road as access obviously reduces the privacy. With the increase in road usage I feel that I would have to install proper perimeter fencing to maintain the same levels of privacy that I have today. 2. Noise – A continuation of the above point, the access road would increase the noise that I would here whilst at my property. Use of the road for access is poor in design as it splits our road in two and we will not be the same quiet community that we are today. 3. Design – The design of the road I feel is unsafe as it was never intended for heavy traffic. The curvature of the road has already led to many occasions where my wall has been hit my vehicles. The increase in footpath width would help but only slightly with this issue. Use of the road for access is poor in design as it splits our road in two and we will not be the same quiet community that we are today. 4. Access – Vehicular access has been prioritised for the new development with complete oversight of the residents of Birch Lea. It will become very dangerous exiting my drive as mentioned above in the statement from my neighbour. People will no doubt speed up and down our road just as they already do on Tinsley Lane. The traffic survey was done on non-working days so the results are complete nonsense. 5. Character and street scene – whilst there is not much point commenting on this for the access road I can comment on viewpoint of the housing development. I have previously had rejected planning permission for a dormer on my property as it was not in keeping with the rest of the street even though I used the same tiles as my roof etc. All the while it seems to be ok to develop a whole new estate that is not in keeping with Birch Lea and Tinsley Lane! <p>We cannot comment on so many things such as devaluation etc. Why should I be out of pocket for this development? I will have to improve my property in terms of security, privacy safety etc in order to maintain the same comfort I have of living on the street today.</p> <p>The facts about the location and all the rest of it are just fluff to pad out the application. The fact of the matter is that we have all objected to this before the plans went in and now we can only comment on very few points. The decision seems to already have been made by the powers that be. There must be many</p>

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			<p>more places in the town that are suitable for a development. Here we have the case of 150 dwellings vs a handful of residents that the council have not really shown much regard for.</p> <p>Recently I have noticed some significant cracks on my property near the proposed access road and I can only imagine that not having designed this road properly this will only lead to more structural issues for me. The road is not built to cope with heavy traffic and the new design I feel will not be too different than what we have today in terms of road strength. The traffic passing will definitely have an impact on my property from many different angles and will no doubt reduce the quality of life for me and my fellow residents.</p> <p>There quite simply, has to be, a better alternative.</p> <p>Looking forward to discussing this in more detail should we be given the opportunity.</p> <p>Suggested Modifications: The consideration for development of Oakwood Football pitches needs to be removed from the plan. The case as we have all commented before is severely flawed.</p>
Rep/158	Resident 65	H2 – Tinsley Lane	<p>In reference to Strategic Housing Land Availability Assessment document, I am writing to object your assessment of choosing the Land " Site Reference 25 - Tinsley Lane Playing Fields", suitable for development. This land has been used for sports facilities many years, and number of teams take part in sports activities regularly. It is notable children and adults take part in sports activities in this playing field, if this land will be used for development, the teams will be impacted, the reason the teams have been using this playing field because they have not been able to find other suitable facilities. It is very important to consider health & wellbeing of these children and adults, recreational sports activities help them to be active, and keep them away from unsociable activities. Also, please note the residents in the neighbourhood raised concerns in regard to use of this land for development when planning permission was submitted by the developer, and the permission was rejected overwhelmingly because of several factors that undermine the neighbourhood including providing access to the land. My recommendation is that all those comments raised against the planning application must be taken into consideration. In conclusion, this land under site reference 25 - Tinsley Lane Playing Fields must be protected for sports recreational activities for the health and wellbeing of the local communities.</p> <p>Suggested Modifications:</p>
REP/024 (2023)	Tony Fullwood Associates	H2	<p>The representation continues to strongly support the allocated site and requests that Crawley Borough Council accept a minor amendment to Policy H2 Housing, Biodiversity and Heritage Site - criterion (v).</p> <p>Support Policy H2: Land east of Balcombe Road/Street Hill, Pound Hill</p>

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			<p>It is common ground with the Borough Council that the site remains suitable, available and achievable (Strategic Housing Land Availability Assessment, February 2023).</p> <p><i>Site Suitability</i> There are no changes in national policy which either diminish the need for housing in the Borough or further constrain development. Recent evidence (Worth Conservation Area Statement, February 2018, Non-designated Heritage Asset Assessment: Historic Parks and Gardens, September 2020, Flood Risk and Sequential Test for Site Allocations, October 2020 and Crawley Transport Study, May 2021) confirms that the site remains suitable for development. The site lies outside the Sussex North Water Supply Zone and therefore water abstraction is not an issue. The site is not affected by water neutrality requirements.</p> <p>The scale of unmet need in the Borough over the Plan period has increased to approximately 7,050 dwellings since publication of the Regulation 19 Draft Crawley Borough Local Plan 2020 – 2035. It is clear from local evidence that effective use must be made of land already allocated within the Borough in the adopted Local Plan.</p> <p>The site remains eminently suitable to deliver 15 dwellings as previously confirmed by extensive evidence, the Local Plan Inspector's report and its allocation in the adopted Local Plan.</p> <p><i>Site Availability</i> The site remains immediately available and would already have been brought forward for housing development but for a frustration caused by the difficulties encountered by the Borough Council in the production of a satisfactory and lawful Development Brief referred to in Policy H2. The site is currently attracting developer interest and is correctly classified as deliverable.</p> <p>A Development Brief was first issued for consultation in July 2017 and has still to be adopted by the Borough Council despite allocation of the site in the adopted Local Plan in December 2015. The Borough Council should continue to engage with the landowner and progress the Development Brief to adoption. The Bucknall family look forward to positive engagement in order to ensure an acceptable and lawful Development Brief that facilitates the early delivery of a sensitive and viable housing development.</p> <p><i>Site achievability</i> The site can be, and should already have been, delivered and is considered to be viable and achievable provided the Development Brief does not impose further restrictions and requirements beyond those agreed by the Local Plan Inspector and contained within adopted Local Plan Policy H2.</p> <p><i>Conclusion</i> There is strong justification for retaining Land east of Balcombe Road/Street Hill, Pound Hill as a deliverable Housing, Biodiversity and Heritage Site allocation within Policy H2 (Key Housing Sites) and the</p>

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			<p>Bucknall family wish to strongly support its retention in the emerging Crawley Borough Local Plan 2024 - 2040.</p> <p>Objection to policy wording: Policy H2 Housing, Biodiversity and Heritage Site criterion (v) The Bucknall family wish to object to the proposed amended wording in criterion v. The criterion now seeks to 'avoid' rather than 'limit' harm to grassland on the site - as currently worded in the adopted Local Plan H2 allocation.</p> <p>This is the only change to the wording of policy criteria for this allocation when compared with the adopted Local Plan. There appears to be no justification for this amendment. Whilst this single change may appear to be minor, inclusion of this proposed wording would result in this part of the Regulation 19 Local Plan not being effective or consistent with national policy – consequently making this part of the Local Plan unsound.</p> <p><i>Effective</i> In considering the allocated site, the adopted Local Plan Inspector stated: <i>The most important attribute of the SNCI, the species-rich meadow grassland, has diminished appreciably since designation as a result of encroaching bramble scrub. Without intervention all the meadow grassland habitat will in time be replaced by bramble and, ultimately, woodland. Proper management of the two-thirds of the SNCI not affected by development would enable the decline of the remaining species-rich meadow habitat to be arrested. Mitigation of this nature, secured as part of the development, would offset the harm caused by the loss of part of the meadow and (as with the heritage assets) represents a balanced approach to meeting the housing needs of the area.</i></p> <p>It is clear that the Inspector's decision was based on an acceptance that part of the grassland within the housing area would be lost, and that the objective of securing net gains for biodiversity would be delivered on the other parts of the Site (hence the allocation of the wider Housing, Biodiversity and Heritage Site). The attempt to impose the revised wording to 'avoid harm' would contradict the Inspector's conclusions and unnecessarily constrain optimising the use of this site. The NPPF (Para. 125) states: <i>'Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies ... ensure that developments make optimal use of the potential of each site.'</i></p> <p>As now worded, criterion (v) of Policy H2 Housing, Biodiversity and Heritage Site allocation potentially undermines the ability of the site to deliver housing development in line with the Inspector's conclusions and the adopted Local Plan.</p> <p>The Local Plan Inspector clearly had in mind the wider tests of achieving sustainable development when allocating this site. In particular he referred to the social benefits of achieving a 'nonetheless significant</p>

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			<p><i>contribution towards meeting Crawley's housing need on a site within Crawley'</i>. He was also clearly mindful of the environmental benefits which can be achieved as a result of development but was aware that achieving a certain scale of development would result in <i>'harm caused by the loss of part of the meadow'</i>. This is accurately reflected in his proposed modification (now included in the Local Plan) which sought to 'limit' harm in the adopted Local Plan.</p> <p>The Local Plan Inspector accepted that, without intervention, all the meadow grassland habitat will in time be replaced by bramble and, ultimately, woodland. Since the Inspector's report in 2015, the areas of semi-natural grassland have indeed been encroached on by surrounding bramble scrub and now only small pockets remain within the indicative housing area as shown on the photographs below (May 2023). This makes this amended criterion even less justified.</p> <p>Criterion (v) of the policy as worded even contradicts the Local Plan which states: <i>'The potential impact of the development and long-term degradation of the valuable habitat on the site ... can be mitigated against through the appropriate high quality enhancement of the remainder of the site.'</i> (Para. 12.58)</p> <p>This is confirmed in the Sustainability Appraisal which in relation to the Housing, Biodiversity and Heritage Site states: <i>...it is essential that appropriate mitigation measures are in place and secured to limit the negative impacts of development (my emphasis).</i></p> <p>It is not acceptable, and should not be necessary, to rely on the phrase at the foot of Policy H2 which states that where impacts cannot be avoided adequate mitigation and compensation measures will be provided to offset any harm caused to the site's important assets. This leaves greater uncertainty over how the Borough Council will apply criterion (v) in their interpretation of NPPF Para 175 (a) in the future. In any event, in the case of the allocated Housing, Biodiversity and Heritage Site the change to criterion (v) represents an unnecessary change to Policy H2 when it has already been accepted by the Local Plan Inspector and in the adopted Local Plan that, as a consequence of this allocation, there will be limited harm to the grasslands.</p> <p>The need for this change is compounded by the revisions to Policy CL8: Development Outside the Built Up Area. Policy H2 Housing, Biodiversity and Heritage allocation sits within the Tilgate/Worth Forest and Fringes. This part of Policy CL8 has been amended to include reference to biodiversity:</p> <p><i>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. (my emphasis)</i></p>

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			<p>There is no caveat to this policy to allow for mitigation.</p> <p>The restriction to avoid harm to grassland within the housing site adds unnecessary uncertainty and could undermine the delivery of this otherwise suitable, available and achievable site in the early part of the plan period - rendering this part of the plan ineffective.</p> <p><i>Consistency with national policy</i> The NPPF (Para. 170) states: <i>Planning policies ... should contribute to and enhance the natural and local environment by:</i> <i>a) protecting and enhancing ... sites of biodiversity... (in a manner commensurate with their statutory status or identified quality in the development plan)...</i> <i>d) minimising impacts on and providing net gains for biodiversity...</i></p> <p>The attempt in Criterion (v) to avoid harm is not consistent with national policy for a Local Wildlife Site and the balanced approach to viewing the benefits and constraints of this site..</p> <p>The NPPF (Para. 125) states: <i>'Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies ... ensure that developments make optimal use of the potential of each site.'</i></p> <p>The attempt in Criterion (v) to avoid harm contradicts the approach advocated in the NPPF as sought by the Adopted Local Plan Inspector.</p> <p>Suggested Modifications: The Borough Council are requested to accept a minor amendment to the wording of Policy H2 Housing, Biodiversity and Heritage Site criterion (v) to revert to that included in the Adopted Local Plan: v. limit harm to the species-rich meadow grassland which contributes to the Local Wildlife Sites (LWS)</p>
REP/068 (2023)	Sussex Wildlife Trust	H2 – Land East of Street Hill/ Balcombe Road, Worth	<p>We note this policy suggests new housing sites as well as those that are being brought forward from the last plan. We are not aware of any work to show that preliminary ecological appraisals of these sites have been undertaken prior to their inclusion within the submission Local Plan. We strongly encourage CBC to consider the way these potential allocations sit within the green infrastructure strategy for the Borough and to ensure that when allocations are made, they do not act to sever ecological networks vital for climate change resilience and natural capital, as per paragraphs 170 and 148 of the NPPF.</p> <p>SWT maintains its objection to the allocation of a Local Wildlife Site for housing. Given the requirement in the NPPF for plans to promote the conservation, restoration and enhancement of ecological networks and the fundamental role that locally designated sites play in this network, this is inappropriate.</p> <p>The Government's Planning Practice Guidance (ref: 013-20190721) states that LWS are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. National planning policy expects plans to identify and map these sites, and to include</p>

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			<p>policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.</p> <p>Therefore, we continue to recommend that the Land East of Balcombe Road/Street Hill, Pound Hill Land / allocation should be removed from the policy. Whilst we acknowledge that the policy includes measures to protect the LWS and supporting habitat, we feel that these extensive measures only act to highlight the value of the area for biodiversity and as such development of this allocation should not be pursued.</p> <p>Suggested Modifications: Land East of Balcombe Road/Street Hill, Pound Hill Land / allocation should be removed from the policy.</p>
REP/156	Resident 63	H2 - 138 – 144 London Road	<p>think the proposals would make maximum use of this under-occupied site, as it is well-positioned for the town, the industrial estate, and the airport.</p> <p>Suggested Modifications:</p>
REP/164	Invia Group (Agent: Montague Evans)	H2 – Land Adj Sutherland House	<p>CRAWLEY BOROUGH COUNCIL: LOCAL PLAN REVIEW REPRESENTATIONS CONCERNING THE REG 19 LOCAL PLAN PROPOSED SUBMISSION DOCUMENT JUNE 2023 LAND ADJACENT SUTHERLAND HOUSE, RUSSEL WAY CRAWLEY, RH10 1ET</p> <p>We are instructed by Invia Group (“the Client”) to submit representations to the Regulation 19 Local Plan Proposed Submission Consultation (“the Reg 19 Draft” / “the draft Plan”) in respect of their property interests at Land to the rear of Sutherland House (“the Site”) as identified by the Plan at Appendix 1.</p> <p>The Client has undergone positive pre-application engagement with officers at Crawley Borough Council (“the Council” / “CBC”) and has instructed a team to prepare and submit an application for residential development of circa 44 dwellings on Site. The application is expected to be submitted during summer 2023.</p> <p>The Site is allocated as a Key Housing Site (Land to Adjacent to Sutherland House) within the draft Plan, which the Client supports in principle. The primary focus of the representations are in relation to the indicative residential site capacity and timescales for development listed within the draft Plan.</p> <p>The Client considers that both of these elements can be improved upon and in doing so assist the Council in meeting the Borough’s Objectively Assessed Housing need (“OAHN”) in a sustainable manner. Meeting the Borough’s OAHN in such a way will be a key test of soundness of the draft Plan when considered by the Planning Inspectorate.</p> <p>Ensuring all suitable previously developed sites (such as this) are optimised will support the Council’s case in demonstrating compliance in this respect.</p> <p>The representations cover the following: 1. National Policy Context; 2. Pre-application engagement; 3. Planning Policy Assessment; and 4. Summary / Conclusions.</p>

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			<p>NATIONAL POLICY CONTEXT</p> <p>In preparing these representations, significant weight has been given to national planning policy set by the National Planning Policy Framework (“NPPF”) (March 2021) and the National Planning Practice Guidance (NPPG) (March 2014 as amended).</p> <p>It is important that proper regard is given to policy guidance at the national level. This is particularly important as ultimately the Local Plan will be required to pass the ‘test’ of soundness (NPPF Para 35). To fail to fully understand what soundness means can only serve to heighten the risk of a Plan being found unsound at the point of examination.</p> <p>In accordance with paragraph 35, Local Plans are ‘sound’ if they are: • Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed needs as a minimum and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where it is practical to do so and consistent in achieving sustainable development; • Justified – the plan should provide an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence; • Effective – the plan should be deliverable over its period and based on effective joint working on cross- boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and • Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework and other statements of national policy, where relevant.</p> <p>Paragraph 11 of the NPPF states that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. .</p> <p>Paragraph 23 requires strategic policies to provide a clear strategy for bringing sufficient land forward, at a sufficient rate, to address objectively assessed needs over the plan period.</p> <p>Paragraph 119 states: “Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses... Strategic policies should set out a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously developed or ‘brownfield’ land.”</p> <p>Paragraph 120 notes that planning policies should, inter alia, give substantial weight to the value of using suitable brownfield land within settlements for homes. Part D of the paragraph promotes and supports development of under utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.</p>

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			<p>Finally, in relation to identifying land for homes, paragraph 68 states that authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment.</p> <p>PRE-APPLICATION ENGAGEMENT The Site was the subject of pre-application discussions and formal feedback from officers in March 2023 (ref: CR/2023/8037/PRA).</p> <p>The pre-application scheme comprised 48 apartments with a maximum building height of seven storeys.</p> <p>In relation to bulk scale and massing, the feedback noted that a taller building could be acceptable in this location subject to acceptable scale and design. The feedback concludes that there is no objection to the principle of residential development on site and that design, scale and massing should be considered further as the design evolves.</p> <p>A set of revised plans were submitted in April (a copy of the plans are attached at Appendix 2). The revised scheme reduced the number of apartments by four to 44. The proposed height remained the same. Email feedback obtained from officers confirmed that the overall scale and massing is improved and would be assessed in further detail at application stage.</p> <p>In summary, the pre-application documentation and subsequent feedback demonstrates the Site is capable of accommodating a greater quantum than the indicative capacity of 30 dwellings noted in the draft Plan.</p> <p>The next section considers the planning policy justification for an increased quantum.</p> <p>PLANNING POLICY ASSESSMENT Paragraph 12.7 of the draft Plan notes that Crawley's total housing need, based on the Standard Method, is 755 dwellings per year.</p> <p>Draft Policy H1 states that the Local Plan makes provision for the development of a minimum of 5,030 net dwellings between 2024 – 2040, including 400 dwellings per annum between years 1-5. The policy acknowledges that after this supply is deducted, there will be a remaining unmet housing need of approximately 7,050 dwellings arising from Crawley over the Plan period. The Council note they will continue to work with neighbouring authorities to explore opportunities to meet this currently unmet need.</p> <p>Draft Policy CL2 states that all new development must identify, test, determine and (where appropriate) embrace opportunities for increased density. The Client supports the intentions of policy CL2.</p>

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			<p>Achieving sustainable development by locating higher density development towards transport hubs is a well established principle. Draft Policy CL4 states that a minimum density of 200 dwellings per hectare should be achieved on development sites within 800m of Crawley or Three Bridges train stations.</p> <p>Draft Plan Policy H2 allocates the Site (among others) as a 'Key Housing Site'. The Site is identified as developable for an indicative capacity of 30 dwellings between years 6-16 of the Draft Plan (i.e. 2029/30 – 2039/40). The quantum and timescales for development are sourced from the Housing Trajectory (31 March 2023) which forms part of the draft Plan evidence base and was in turn informed by the Strategic Housing Land Availability Assessment February 2023 ("SHLAA"). This evidence based process accords with paragraph 68 of the NPPF and is considered sound.</p> <p>For reference, a summary of the site assessment (site ref: 91) undertaken as part of the SHLAA states: "Site Suitability – Yes – The site is adjacent to a former office building recently converted to a residential use (136 flats) and is located in a sustainable location. Allocation as a Key Housing Site is proposed in the submission draft 2024 Local Plan. Further new build residential development could be accommodated within the site subject to appropriate design. Site Availability – Yes – the site is understood to be available for development and is being promoted. Site Achievability – Yes – The indicated scale of development in this location is considered to be viable."</p> <p>The SHLAA notes the Site as having an area of 0.35 Ha and a capacity for 30 dwellings. The SHLAA summary states that the brownfield site is in a sustainable location and can be expected to contribute to Crawley's housing land supply in the medium term.</p> <p>Draft Policy CL4 provides a clear policy position in relation to target densities and links them to a strategic objective of achieving sustainable development which aligns with NPPF Paragraph 35.</p> <p>The Site is located approximately 600m south west of Three Bridges Station. It therefore falls within the 800m catchment identified in draft Policy CL4 for increased density. The minimum density target in such locations is 200 dwellings per hectare. On this basis, provision of 30 dwellings (as per the indicative capacity highlighted under Policy H2) would equate to 86 dwellings per hectare, significantly below the minimum target.</p> <p>44 dwellings (as per the pre-application scheme) on the 0.35ha site would equate to 126 dwellings. This would increase the identified site capacity, bringing it closer to the target under policy CL2. Whilst it still falls short, the further work undertaken through pre-application engagement provides a robust evidence base to justify the quantum whilst also making sure the policy is 'sound' by making effective use of land in meeting housing need, in line with NPPF paragraph 119.</p>

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			<p>The pre-application plans and positive pre-application feedback enhance the existing evidence base in relation to potentially acceptable residential capacity for the Site. A greater quantum would not only accord with national policy objectives by making the most efficient use of land, it would also increase the projected housing supply in the borough which, at present, falls significantly short of the OAHN.</p> <p>In relation to timescales for delivery, the Site is noted as 'developable' within a time period of 6-16 years.</p> <p>The definition of 'developable' in the NPPF is: "To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be achieved".</p> <p>The definition of 'deliverable' is: "To be considered deliverable, sites for housing should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on site within five years. In particular: a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."</p> <p>It is acknowledged through the emerging allocation for development and positive pre-application feedback that the Site offers a suitable location for development now. The Client also confirms the Site is available now. The size of the Site / proposed scheme means it is capable of being built out in one phase and being progressed by a single developer. These are positive factors in relation to the potential speed of delivery and should be supported given the Council's historic issues with completions on larger sites being delayed and the subsequent knock on effect on five year supply (paragraph 12.6 of the draft Plan).</p> <p>In the light of the active engagement by the Client in pre-application discussions, desire to submit an application in 2023 and build out a residential scheme as soon as possible, the Site should be considered 'deliverable' instead of 'developable'. In doing so, the Site will also contribute to the Council's five year housing land supply, whereas, at present, it does not.</p> <p>SUMMARY / CONCLUSIONS</p> <p>The identified housing supply within the draft Plan falls significantly short of the Council's objectively assessed housing need. Consequently, the draft Plan falls foul of Paragraph 11 of the NPPF which requires strategic policies to, as a minimum, provide of objectively assessed needs for housing.</p>

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			<p>As currently drafted, there is a danger that Draft Plan H1 and therefore the draft Plan would be considered to fail to demonstrate it has been positively prepared or is effective in meeting the Borough's OAHN. In the light of this, there is a possibility the draft Plan will not be found sound when examined by the Planning Inspectorate.</p> <p>The Site is allocated as a Key Housing Site within the draft Plan. This is supported and found sound in light of the sustainable location, previously developed nature and proximity to other residential uses.</p> <p>There is an opportunity to increase the indicative quantum identified for the Site within draft Plan Policy H2 from 30 to 44. This is supported by further design development undertaken by the Client since the SHLAA and has been considered by officers at pre-application. The requisite plans are submitted as part of these representations and strengthen the evidence base in support of a high indicative quantum.</p> <p>The Site is also capable of being considered 'deliverable' instead of 'developable'. Bringing the timescale forward to show target completions within years 1 – 5 of the Plan period will assist the Council in meeting their five year housing land supply.</p> <p>In conclusion, the Site represents a prime opportunity to optimise a previously developed site in a suitable location that already benefits from a draft allocation and positive pre-application feedback. By optimising the Site and increasing the indicative residential quantum, it will reduce pressure to identify additional unallocated sites for development.</p> <p>We would like to reserve our right to attend the Examination in Public of the draft Plan in due course.</p>

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			<p>Suggested Modifications:</p>

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REP/166 (check 2020 – REP/059 and 2021 reps)	Surrey County Council	H2 (Tinsley Lane)	Minerals and Waste SCC previously provided comments regarding the consultation on the initial Regulation 19 Local Plan Review in March 2020. SCC reiterate our support for Policy H2: Key Housing Sites, which relates to development at Tinsley Lane, Three Bridges, adjacent to the Crawley Goods Yard safeguarded minerals site. This policy states that development on the proposed housing site must be designed to minimise potential future conflicts and constraints on the function of the adjacent safeguarded minerals site. This is supported, as the continued operation of this facility will help to ensure that Surrey and the wider South East is supplied with necessary construction aggregates. We note that the Crawley Goods Yard is also included within the Local Plan map.
		Local Plan Map	Suggested Modifications:
REP/168	Network Rail	H2 – Crawley Station Car Park	There are continued concerns over the inclusion of the car park at Crawley Station as part of the Town Centre Key Opportunity Sites. There appears to be no proposals for the reprovision of the car park serving the rail station should the existing be lost. Whilst Network Rail encourages active and sustainable modes of transport to access the station, there remains a need for those who are unable to access other modes to be able to drive and park close to the station. The removal of this modal choice impacts negatively on the diversity of offer for those accessing the station and we would encourage the Council to address this issue. Any loss of the car park would conflict with draft policy IN1 which sets out that 'existing infrastructure services and facilities will be protected....unless there is sufficient alternative provision of the same type in the area, or an equivalent replacement'.
			Suggested Modifications:
REP/169	Resident 67	H2 – Tinsley Lane	<p>1) This development is not supported by any increase in neighbourhood facilities, no bus stops within a reasonable distance, and no local amenities such as shops/post offices within a walkable distance.</p> <p>2) It Reduces the available recreational space in the town, specifically this area, which, due to its location is effectively 'cut off' by the railway lines, M23 and Manor Royal from any other residential or green spaces.</p> <p>3) The proposed main access to the development is using an existing cul de sac which has a steep incline and blind bend which is inappropriate.</p> <p>3.a) Even partially widening the road will not increase the safety of the road for users. this road becomes dangerous during heavy frost/snow.</p> <p>3.b) Residents of the road MUST reverse into their driveways to safely exit as it is, however with the road becoming an access point to a residential area of 120+ homes (of which the majority will have at least one car) will be impossible especially at peak periods.</p>

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			<p>3.c) Widening the road as has previously been proposed will reduce the grass verges in the cul de sac.</p> <p>3.c.1) Verges are used by public utility companies (such as broadband, telephony, gas and water companies) to install and access their equipment. I think it is a concern that there will be less available space for utility companies.</p> <p>3.c.2) Verges act as a pedestrian refuge and, if necessary, vision splay (allowing a clear view of the road). It will be dangerous to reduce the vision splay for driveway access given the nature of the bend and incline of the road, especially given the higher throughput of traffic accessing the new development.</p> <p>3.c.3) Reducing the pavements will not be possible if the width of the pavement is to be large enough to accommodate wheelchair users, mobility scooters, prams, pushchairs or parents and children safely. given the Local plan's intent to ensure that the housing is 'mixed' it is likely that the population of the development will include all of the above.</p> <p>3.d) With the increase in eCommerce shopping, there is an increased number of vans and refrigerated delivery trucks for grocery shopping. There is already issues in the cul de sac when even one such vehicle arrives to make a delivery, not only would the volume of such vehicles using Birch Lea increase because of the additional deliveries via Birch Lea to the new dwellings, but those making deliveries within Birch Lea would cause access issues due to the fact it is a cul de sac road and was not designed as an access road and is not wide enough. the dwelling do not only mean an increase in residential owner's traffic but also these types of vehicles.</p> <p>3.e) It is unclear how refuse collections would work in the cul de sac. Again, during the collection period it is already impossible for cars to enter or exit the cul de sac. If this was the main access route for the new dwellings this would cause a complete bottle neck for residents trying to leave the development, and/or obstruct and delay the refuse collection teams going about their work.</p> <p>3.f) The majority of homes in Birch Lea only have enough parking for a single car. Although some have garages, they are not big enough fit a car of standard size and so when residents have carers visiting or any other guests, on road parking is required. Should the council decide to disallow on-road parking in the cul de sac this would increase parking pressures on Tinsley Lane itself which is already almost a one lane road due to on-road parking.</p> <p>4) The space allowed for Oakwood football team is not sufficient for it to continue in its present size and would result in several of its boys and girls youth teams having nowhere to play.</p>

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			<p>5) I can see no way in which the actual construction will not harm the flora and fauna of the Ancient Summersvere Woods, nor am I convinced that the eventual increase in population of the area will not ruin the woods and reduce its existing habitats over time.</p> <p>6) The wider Tinsley Lane area is already facing traffic issues both via Maxwell Way and from Tinsley Lane onto Gatwick Road. Tinsley lane itself cannot cope with rush hour traffic as it stands and the increase of traffic at peak periods will be dangerous and cause additional pollution in the area.</p> <p>7) There is no mention in the plan of the provision of incremental local services such as schools, doctors, dentists, post offices, pharmacies etc. to cope with the additional population.</p> <p>Suggested Modifications: PER THE ABOVE COMMENTS I BELIEVE THAT THE SELECTION OF THIS SITE SHOULD BE REVIEWED AS IT IS NOT SUITABLE</p>
REP/168	Network Rail	TC3 H2 – Town Centre Key Opportunity Site	<p>Further, Network Rail suggest that where development occurs close to Crawley station, within the identified Opportunity site, that consideration is made to securing improvements to the station to support the anticipated increased use of this as a result of potential development that would come forward. Reference to securing developer contributions to support these improvements, both at Crawley station and others in the Borough should be included in the Infrastructure Plan.</p> <p>Suggested Modifications:</p>
REP/160	Chichester District Council	H3 H3a-H3f	<ul style="list-style-type: none"> supports the introduction of high-density targets for the Town Centre and accessible locations (Policy CL4) and the housing typology policies (Policy H3, H3a – H3f) which will help to maximise capacity and positively influence development opportunities. <p>Suggested Modifications:</p>
REP/033 (2023)	Horsham District Council	H3a	<p>Strategic Policy H3a: Estate Regeneration We support this policy in principle, but consider it is not justified as it stands and that its effectiveness could be improved.</p> <p>Given the pressing need for housing in the area and unmet housing need, it is considered imperative that estate regeneration opportunities are explored as this is a potential source of additional housing supply that is, to a great extent, within the control of CBC. We had previously commented on the policy in both 2020 and 2021 and suggested that this could be done as part of the density work that was being undertaken (and is now published). However, it does not appear that estate regeneration opportunities formed part of this work nor, given the wording of paragraph 12.67, that any such exploration has taken place or is currently planned.</p>

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			<p>Suggested Modifications: Change sought: We request that paragraph 12.67 is more positive in its wording and sets out a commitment for CBC to explore estate regeneration opportunities. Given the high level of unmet needs identified we feel that 'no stone should be left unturned' in exploring what can be done to reduce this disparity, as such we would suggest that this work is undertaken as soon as is possible.</p>
REP/152	Save West of Ifield	Topic Paper 4: Housing Supply	<p>Topic Paper 4: Housing Supply 3.8.1 ... No significant estate regeneration schemes have as yet been proposed by the council and any potential schemes which may emerge are likely to take time owing to the complexity of this kind of development. At the same time, this type of approach is expected to become increasingly relevant as part of the wider national and local agenda on densification, and is given specific support in national policy. 3.8.2 In light of this and as noted in section 3.3 above, Estate Regeneration is one of the potential forms of residential development for which provision is made as part of the 'typology' approach set out in draft Local Plan policies H3 and H3a-f. Policy H3a thus sets out specific requirements for this form of development in terms of the need for a comprehensive masterplan approach; the importance of balancing efficient use of land with residential amenity and open space requirements; and the engagement of local communities and affected individuals</p> <p>This lack of commitment to estate regeneration is disappointing, given Crawley's inability to meet its housing need. While it is acknowledged that estate regeneration will become increasingly relevant, as part of a move towards greater densification, there doesn't appear to be a recognised need to start planning for this. Neighbouring LPAs who are pressed to provide housing for Crawley might reasonably ask why.</p> <p>Suggested Modifications:</p>
REP/152	Save West of Ifield	Policy H3a – Para 12.69	<p>Page 172 – para 12.69. Policy H3b – estate regeneration 12.67 At this stage, there are no estate regeneration projects planned in Crawley. ...</p> <p>Suggested Modifications:</p>
REP/033 (2023)	Horsham District Council	H3b	<p>Strategic Policy H3b: Densification, Infill Opportunities and Small Sites We support this policy which is clear in its encouragement of efficient use of land in a number of ways.</p> <p>Suggested Modifications:</p>
REP/152	Save West of Ifield	Topic Paper 4: Housing Supply – Para 2.4.13	<p>2. 4.13 The Local Plan approach to Densification and Urban Form is supported by the Crawley Densification Study. The densification study has been prepared to support the Local Plan approach in responding to the emphasis placed on the effective use of land in the NPPF. It identifies the potential for achievement of increased densities and a more compact form of development within the borough, particularly in certain areas, and the potential for this to deliver wider benefits in terms of wellbeing and</p>

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			<p><i>climate change, provided that this is undertaken in a way which responds to existing character and incorporates high standards of design.</i></p> <p>The CBC Densification Study is very 'draft'. It is incomplete and inconclusive – in particular it doesn't quantify the potential impact of any densification scenarios. Draft Densification Study Part 1 (January 2021)</p> <p>Policy H3b is very general and focussed on infill, small sites and windfall opportunities, rather than providing a sense of any strategic intention to use densification to address Crawley's inability to meet its housing need. Neighbouring LPAs who are pressed to provide housing for Crawley might reasonably ask why.</p> <p>This point had been made by the Planning Inspector in 2015. In para 96 of their 2015 Report they said: 'Not only are the external space standards of policy CH5 unnecessarily prescriptive, they are also unduly onerous. At the hearings the Council was unable to convince me that, for example, a typical 3-bed 5 person terraced house requires 90sq m of private amenity space if it is to satisfy the 'good design' requirement of NPPF. In an urban borough where there is insufficient land to meet about half the housing need, there is a real risk that the Council's space standards militate against innovative housing layouts which could increase densities whilst still delivering high quality residential environments'.</p> <p>How have their points been addressed in this latest draft Plan?</p> <p>Suggested Modifications:</p>
REP/033 (2023)	Horsham District Council	H3c	<p>Strategic Policy H3c: Town Centre Sites</p> <p>We support this policy. It is considered that there may be further opportunities for the town centre area and mixed-use developments to provide more housing to help meet the unmet need in Crawley, as set out in our comments to other policies within the plan.</p> <p>Suggested Modifications:</p>
REP/166 (<i>check 2020 – REP/059 and 2021 reps</i>)	Surrey County Council	DD1 H3c H3e	<p>SCC also welcome the requirement, as set out in policies DD1, H3c and H3e, for waste and recycling storage to be designed into new housing development schemes from the start. However, we note that a requirement for the sustainable management of construction, demolition, and excavation waste is not included within these policies, as suggested in our previous comments dated 2 March 2020, and in accordance with West Sussex Waste Local Plan 2014, Policy W23: 'Waste Management within Development'</p> <p>Suggested Modifications:</p>

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REP/033 (2023)	Horsham District Council	H3d	Strategic Policy H3d: Upward Extensions We support this policy which encourages efficient use of land through building upwards. Suggested Modifications:
REP/056 (2023)	Gatwick Airport Limited	H3d	H3d: Upward Extensions (to Houses) 62. We supported Policy H3d in the 2020 Regulation 19 DCLP but suggested a minor revision to criterion (i) of the policy (aerodrome safeguarding) in paragraph 15.1 of our representations. We note that the policy and supporting text has been amended as suggested. We continue to support the policy as amended. Suggested Modifications:
REP/066 (2023)	Mid Sussex District Council	H3d	Policy H3d: Upward Extensions Response from January 2020 continues to apply. Suggested Modifications:
REP/033 (2023)	Horsham District Council	H3f	Strategic Policy H3f: Open Spaces We support this policy which strikes an appropriate balance between protecting and enhancing valued open spaces whilst taking a pragmatic approach to allowing some housing development in certain circumstances. Suggested Modifications:
REP/113 (2023)	Natural England	H3f	Policy H3f: Open Spaces We support this policy's requirement iv., regarding the need to maintain and improve links to the wider GI network, resulting in Net Gain for biodiversity. This is in line with the NNPF's aims (paragraphs 20. 91. 150. 171. 181.) and the various goals and actions of the EIP relating to green infrastructure provision. Additionally we support policy requirement vii., regarding the protection of ancient woodland, aged trees and TPO protected trees; in line with the NPPF (paragraph 180) and the goals and actions of the EIP. Suggested Modifications:

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REP/131 (2023)	SMB Town Planning on behalf of Oxford Match Ltd	H4	<p>Requiring three-bedroom properties in town centre locations in car-free developments are unlikely to be attractive to families and may well result in marketing difficulties. With this knowledge, housebuilders and developers may well be reluctant to provide for three-bedroom housing development to provide a mix of dwelling types and sizes to address the nature of local housing needs and market demand, dependent upon the characteristics of the site (our underlining for emphasis). The Policy also contains a “Housing Mix Test” which in our view is prescriptive and potentially conflicts with the “characteristics of the site” in town centre locations where paragraph 3.16 of the Draft Plan states that “<i>family accommodation, in accordance with Policy H3cmay not necessarily be suitable for all sites</i>”</p>
			<p>Suggested Modifications: Therefore, we suggest that the first paragraph of Draft Policy H4 be reworded as follows: <i>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. 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. However, it is recognised that the provision of family accommodation in Crawley Town Centre, in accordance with Policy H3c may not necessarily be suitable for all sites.</i></p> <p>Furthermore, the table under paragraph 13.14 indicates the provision of 30% of the market housing element on town centre sites should be Family Homes (25% 3-bedrooms and 5% 4-plus-bedrooms). In addition, the table indicates that the affordable rental element to be provided should be 25 - 30% for 3-bedrooms and 5 - 10% for 4-plus bedrooms. This seems to be excessive especially for a flatted town centre development and may have the adverse effect of reducing the viability of town centre schemes and consequently may well materially alter the affordable housing provision.</p> <p>In light of our proposed changes to Draft Policy H4 above, the justifying text in paragraph 3.16 should be amended to read: <i>“Town Centre mixed use developments will be expected to be built at higher densities whilst including family accommodation where site specific conditions allow. Applicants will need to justify why they have omitted family - sized units in proposed town centre development schemes”.</i></p>
REP/131 (2023)	SMB Town Planning on behalf of Oxford Match Ltd	H5	<p>Policy H5 expects town centre sites requiring 25% affordable housing to be split 60% social rent and/or affordable rent and up to 40% as intermediate tenure. At a site specific level however, Policy H5 identifies the circumstances under which this target may not be met and provides for a financial payment for off-site provision.</p> <p>Suggested Modifications:</p>
REP/133 (2023)	The Planning Bureau	H5 Viability	<p>McCARTHY STONE RESPONSE TO CONSULTATION ON THE CRAWLEY BOROUGH DRAFT LOCAL PLAN 2024-2040 (REGULATION 19) SUBMISSION PUBLICATION CONSULTATION (MAY TO JUNE 2023)</p>

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			<p>Thank you for the opportunity to comment on the Crawley Borough Draft Local Plan 2024 – 2040 (Regulation 19), submission publication consultation.</p> <p>McCarthy Stone is the leading provider of specialist housing for older people including retirement housing and extra care housing in the UK. Please find below our comments on the consultation.</p> <p>We note that this is a further regulation 19 consultation and that the website states that 'If you submitted a response to a previous Regulation 19 consultation, you do not need to resubmit or repeat these. Responses from the previous Regulation 19 consultations will be submitted, in full, to the Secretary of State for the Local Plan's examination, along with responses received in this consultation.'</p> <p>We have therefore responded to this consultation on the basis that our representation, REP/133, made on the 30th June 2021 will still be submitted alongside this representation but have the following further comments to make.</p> <p>In addition, we highlight that we still maintain our comments / objections to policies DD1, DD4, ST2 and H3. In particular, we are disappointed that the Council have not considered incorporating a stand along policy supporting the delivery of housing for older people, given the need, in line with our comments to H3.</p> <p><u>Policy H5 Affordable housing.</u></p> <p>We provided a detailed response to the 2021 Regulation 19 consultation and being mindful of the guidance in the PPG that confirms it is the responsibility of site owners and developers to engage in the Plan making process we provided a separate document to that consultation that undertakes viability appraisals for the sheltered and extra care older persons' housing typologies. Within this viability appraisal, we challenged some variables within the 'Crawley Borough Local Plan Review: Whole Olan Policies and CIL Viability Assessment, March 2021' (Dixon Searle). Our representation concluded that older person's housing is not able to provide an affordable housing contribution or CIL in Crawley and recommended that 'Specialist older persons' housing including sheltered and extra care accommodation will not be required to provide an affordable housing contribution'.</p> <p>As a result of our representation no amendments to the plan appear to have been made. The council have published a 'Viability Assessment – Updated, December 2022' (Dixon Searle) (Viability Assessment) to support this consultation however this does not discuss or update viability analysis of specialist housing for older people (sheltered / extra care).</p> <p>This lack of amendment or update is surprising given our detailed viability appraisal of sheltered and extra care schemes that identified discrepancies in the inputs to viability in terms of dwelling mix, sales period site works, profit, sales and marketing costs and sales values. Since the original Viability Assessment was undertaken build costs have also increased and sales values have been more challenging, both of which will affect viability further.</p> <p>We would remind the Council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability</p>

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			<p>assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan” (Paragraph: 002 Reference ID: 10-002-20190509). The evidence underpinning the Council's planning obligations and building requirements should therefore be robust.</p> <p>The viability of specialist housing for older people is more finely balanced than ‘general needs’ housing and although we commend the Council in testing the older people’s housing typology within the Viability Assessment, as this accords with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG, we are disappointed that our representation has not been considered in detail and changes incorporated within the plan. If this is not done, the delivery of much needed specialised housing for older people may be significantly delayed with protracted discussion about other policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need.</p> <p>We therefore recommend that the Council ensure that a further update to the Viability Assessment is undertaken to inform the plan. The update must consider older person’s housing and the inputs discussed in our previous representation. If older person’s housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and delaying the provision of much needed older persons housing.</p> <p>Suggested Modifications: Recommendation: The viability evidence is updated to make sure it is up to date, the outcomes then incorporated into the plan and we would recommend the following text is added to policy H5. ‘Specialist older persons’ housing including sheltered and extra care accommodation will not be required to provide an affordable housing contribution’</p>
REP/167	Muller Property Group (Agent: Walsingham Planning)	H5	<p>Strategic Policy H5: Affordable Housing</p> <p>The draft text states: 40% affordable housing will be required from all residential development, including those providing care regardless of whether it falls into Use Class C2 or C3, resulting in a net increase of at least one new housing unit across the borough which fall outside the Town Centre.</p> <p>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 First Homes. This equates to 30% of the total scheme for Affordable/Social Rent and 10% of the total scheme as First Homes, resulting in a 75/25 tenure split.</p> <p>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.</p> <p>Crawley Town Centre</p>

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			<p>For residential development resulting in a net increase of at least one new housing unit within the Town Centre, including those providing care regardless of whether it falls into Use Class C2 or C3, 25% affordable housing will be required.</p> <p>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. The Intermediate element will be expected to comprise at least 25% in the form of First Homes, with the other 15% to comprise First Homes or other Intermediate products, including Shared Ownership, Shared-Equity or other 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.</p> <p>In the event of withdrawal of national policy requiring 25% of affordable housing secured through developer contributions to be First Homes, this minimum proportion will be expected to be provided in the form of Shared Ownership homes.</p> <p>Affordable Care This Policy applies to all new residential developments, including those providing care, regardless of whether it falls under Use Class C2 or C3. Affordable provision for such schemes should be met on-site and equate to:</p> <ul style="list-style-type: none"> • Borough-Wide: 40% affordable provision (tenure to be determined); • Town Centre: 25% affordable provision (tenure to be determined). <p>For traditional Care Homes, the requirement will be for the provision of the equivalent percentage in affordable care beds in order to meet the Policy.</p> <p>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.</p> <p>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 along with claw-back mechanisms 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.</p> <p>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</p>

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			<p>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.</p> <p>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.</p> <p>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.</p> <p>These representations relate to the 'affordable care' subsection set out above.</p> <p>The proposed requirement of a care home to provide affordable housing and affordable care will stymie development and make care homes unviable. It is not the purpose of the planning system to place barriers in the way of development which addresses a specific identified need.</p> <p>There is a strong need for new purpose built care homes within Crawley and this need will only get more acute over time with an ageing population and ageing care home stock. The Policy risks failing to take into account future trends and future need, and instead places a significant obstacle in the way of development.</p> <p>It is impractical and unrealistic to expect a new care home to provide affordable care on site, operators simply do not want this as it causes operational issues and will affect their ability to deliver new care homes within the District. [Note to Muller: we could do with some more operational arguments here]</p> <p>It would fail to realise the potential of individual sites. It is important that future policies allow a site-by-site assessment rather than the application of a broad-brush 'one size fits all' policy. Failure to take account of individual site circumstances including development costs and viability would be contrary to the objectives of the NPPF.</p> <p>It will be important for future draft policies to have flexibility built into them and avoid an overly prescriptive approach to planning and development control across the District, policies should have sufficient scope to allow the decision taker to have regard to potential of sites on an individual basis, both now and in the future over the course of the Plan period.</p> <p>Policies need to be able to be agile and respond to changes in market conditions and/or situations where supply has been affected, for example sites not coming forward leaving the Council's housing delivery targets at risk.</p> <p>Draft Strategic Policy H5 is therefore unsound. It is not justified, it will not be effective, and it is not consistent with national policy.</p>

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			<p>Summary</p> <p>Policies must avoid being subjective or overly restrictive, and which would undermine the objectives of the NPPF for development plans to support mixed and balanced communities, support economic development, and be responsive to changing trends and demands. The planning system should be a tool to unlock the potential of sites rather than restrict or hamper them.</p> <p>In summary, for the reasons set out above:</p> <ul style="list-style-type: none"> • We do not support the proposed designation of structural landscaping along Balcombe Road, and Policy CL6 in general as being too subjective in its wording and unsound. • We do not support the wording of Policy HA5. It oversteps the mark and is inconsistent with national policy, the criteria set out is what is used to assess listed buildings. • We do not support Policy H5 and the proposed inclusion of care homes as being required to contribute towards affordable housing and affordable care. This will place a barrier to development, risk care home proposals becoming unviable, and pass on further costs to the developer. <p>We reserve the right to comment on any policy in any future consultation document and if appropriate take part in an Examination in Public.</p> <p>Suggested Modifications:</p>
REP/033 (2023)	Horsham District Council	H8	<p>Policy H8: Gypsy, Traveller and Travelling Showpeople Sites</p> <p>We support this policy in principle but consider that its effectiveness could be improved to reflect that need may arise across the housing market area, rather than just within Crawley Borough, which would justify the release of the site. Though the Horsham Local Plan is still emerging and an updated assessment of the need for pitches and plots is yet to be finalised, our emerging evidence suggests that it is unlikely that HDC will be in a position where we can identify how all of our needs for gypsy and traveller provision could be met. If such a circumstance were to arise, we would seek assistance from yourselves as we share a common housing market area, to meet any unmet needs. We will endeavour to provide clarity on this point as soon as we are in a position to do so.</p> <p>Suggested Modifications:</p> <p>Change sought: It is considered that the words 'in Crawley' should be removed from the policy to reflect that need may arise elsewhere. Consequential changes to the reasoned justification should also be made for the same reason.</p>

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REP/050 (2023)	Homes England	H8	<p>Policy H8: Gypsy, Traveller and Travelling Showpeople</p> <p>Homes England is supportive of the ambitions and intention of draft Policy H8 as a whole, and indeed as part of the Land West of Ifield strategic allocation Homes England is fully committed to providing for a permanent Gypsy and Traveller site.</p> <p>It is noted that a similar policy position to aircraft noise set out in EP4 is adopted in draft Policy H8 (Gypsy, Traveller and Travelling Showpeople Sites) – albeit the UAEL at a lower limit of 57dB LAeq,16h. Consistent with our concerns with Policy EP4, this does not appear to be sufficiently justified and a more flexible approach should be considered. This is not effective as could limit the delivery of much needed Gypsy, Traveller and Travelling Showpeople Sites in the authority area / wider housing market area, nor justified as the sound levels adopted by Crawley Borough Council for the Significant Observed Adverse Effect Level (SOAEL) and the Unacceptable Adverse Effect Level (UAEL) within the Noise Annex are significantly lower than those in mainstream use for aviation noise, are out of step with national guidance.</p> <p>Furthermore, recent appeal and committee decisions, as set out in Appendix 1, provide evidence that this type of development can be accommodated and found acceptable beyond the 57dB contour where appropriate mitigation is applied and when considering sites on a case-by-case basis. In these examples, it can be demonstrated that acceptable living conditions can be achieved within Gypsy and Traveller homes beyond the 57dB contour, through various mechanisms and mitigation – for example by meeting the BS3632:2015 ‘Specifications for Residential Park Homes and Residential Lodges’. Furthermore, the Riverdale Farm appeal scheme in Mole Valley demonstrates where and Inspector has concluded that noise exposure is not necessarily perceptibly different and therefore unacceptable purely because the site is located beyond a 57dB contour line.</p> <p>Suggested Modifications:</p> <p>On the basis of the above, Homes England considers that the current wording of Policy H8 is not justified nor sufficiently flexible to ensure future needs of the Gypsy and Traveller Community are met. There is an opportunity to introduce another assessment criteria to ensure that the policy is positively prepared and justified. Recognising the sensitivity of the community and their requirements compared to other occupiers, the proposed additional criteria would introduce a sequential approach ensuring every attempt has been made to identify areas outside of the 57dB first, and only allowing development within it if no alternative sites are available and adequate mitigation can be demonstrated.</p> <p><u>Criteria for Assessing other Proposals</u></p> <p><i>Proposals for a new permanent or transit Gypsy, Traveller and Travelling Showpeople site will only be considered suitable if the proposed site:</i></p> <p>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/transit sites of up to one month, and 66 decibels for temporary transit sites, or</p>

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b) is 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/transit sites of up to one month, and 66 decibels for temporary transit sites, and it can be demonstrated that no suitable alternative sites exist outside of these noise contours; and any proposal is accompanied by a noise assessment demonstrating that the proposed site is adequately and appropriately protected from noise exposure in line with national policy and guidance. ...

**Appendix 1: Examples of permitted Gypsy and Traveller accommodation in proximity to airports
Local Precedent Examples**

Below is a table detailing local precedent examples of Gypsy and Traveller sites which have been permitted within locations that are exposed to aircraft noise.

Appendix 1: Examples of permitted Gypsy and Traveller accommodation in proximity to airports

Local Precedent Examples

Below is a table detailing local precedent examples of Gypsy and Traveller sites which have been permitted within locations that are exposed to aircraft noise.

Scheme	Local Planning Authority	Application Reference	Status/ Decision Date	Net Pitches/ Description of Development	Comments
Land at Russ Hill, Charlwood, Horley, Surrey, RH6 0EL	Mole Valley	MO/2019/0741	Permitted 10/8/2020	Change of use of land to mixed use. Stationing of 2 No. static caravans and two touring caravans, construction of hardstanding, parking for four vehicles, associated infrastructure and the keeping of horses.	<p>Extract from Committee Report:</p> <p>"The plan below shows the noise contours arising from the aircraft movements at Gatwick Airport. The site is exposed to average day time noise levels between 57dBA and 60dBA and average night time noise levels between 51dBA and 54dBA.</p> <p>Gatwick Airport Limited take the view that the levels of noise, both during the day and at night would still be at levels that would be regarded as significant. Current national noise policy as set out in the NPPF and expanded upon further in the Noise Policy Statement for England (2010) is to 'avoid noise giving rise to significant adverse impacts on health and the quality of life' (NPPF paragraph 180). The government's Planning Practice Guidance advises that significant adverse effects should be avoided through, for example, the choice of sites at the plan-making stage, or by the use of appropriate mitigation such as altering the design and layout.</p> <p>As covered in paragraph 7.40 above, noise was an issue for consideration in the appeal at Riverdale Paddocks in Rusper Road Capel. The Inspector commented on this issue as follows:</p> <p>"The site is crossed by the 57dBA noise contour around Gatwick Airport, and the caravans are now sited within that contour. Therefore, Gatwick Airport Limited has objected to the development in its current arrangement on the grounds that residents would experience unacceptable noise. However, it has nonetheless suggested it would be</p>

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					<p>acceptable to relocate the caravans to the southern side of the site where they would be outside the contour.</p> <p>Based on what I heard on my visit, there is no appreciable noise difference between the northern and southern sides of this relatively small site. Therefore, I consider that the noise experienced in the caravans in their current positions is not unacceptable."</p> <p>Taking into account this recent decision (June 2016) and the similarity in circumstances between that site and the current proposal, it is considered that refusal based on noise exposure to the occupiers would not be justifiable."</p>
Riverdale Farm, Rusper Road, Capel, Surrey	Mole Valley	MO/2015/0768 APP/C3620/W/15/3137675	Refused. Allowed on Appeal 21 June 2016	Retrospective change of use of land for stationing of caravans for residential occupation with associated development comprising new access, hard standing, landscaping and fencing between plots, timber utility sheds and package treatment plant for 2 No. gypsy-traveller plots.	<p>Extract from Appeal Decision:</p> <p>"The site is crossed by the 57dBa noise contour around Gatwick Airport, and the caravans are now sited within that contour. Therefore, Gatwick Airport Limited has objected to the development in its current arrangement on the grounds that residents would experience unacceptable noise. However, it has nonetheless suggested it would be acceptable to relocate the caravans to the southern side of the site where they would be outside the contour. Based on what I heard on my visit, there is no appreciable noise difference between the northern and southern sides of this relatively small site. Therefore, I consider that the noise experienced in the caravans in their current positions is not unacceptable".</p>

Wider Precedent Examples:

Below is a table detailing wider precedent examples of Gypsy and Traveller sites from across the county which have been permitted in locations that are exposed to aircraft noise.

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Scheme	Local Planning Authority	Application Reference	Status/ Decision Date	Net Pitches/ Description of Development	Comments
Land West of Skelton's Drove Beck Row Suffolk	West Suffolk Council	DC/22/0648/ FUL	Permitted 24/3/2023	Change of use of the land for provision of 18 pitches for Gypsy/ Traveller residential use; b. 18 dayroom buildings, with hardstanding for the siting of one static and one touring caravan on each pitch; c. vehicular access and associated parking; d. hard and soft landscaping scheme	<p>Extract from Delegated Report:</p> <p>The site falls within the 72dB MOD noise contour with reference to aircraft noise.</p> <p>The main noise source the site is exposed to is flight noise from the nearby RAF Mildenhall. The application is supported by an Acoustic Report including a noise risk assessment and Acoustic Design Statement. A noise survey was undertaken over an 8 day period which established that the highest measured daytime level was 62dB L_{eq,16h} and the highest night time was 51dB L_{night}. The night time L_{night} was taken as 66dB, all to the nearest decibel. At the façade of the proposed units a +3dB correction is applied.</p> <p>The initial site noise risk assessment was assessed as low to medium, according to Figure 1 of PropG Planning and Noise. To achieve PropG Noise level Guidelines mechanical ventilation. The reports advises that 'the static caravans would need to provide an overall sound insulation of at least 30dB. This can be achieved by ensuring that the caravans installed meet the specifications of BS3632:2015 'Specifications for Residential Park Homes and Residential Lodges'.</p> <p>This standard was revised in 2015 to take into account changes in technology and improve energy efficiency performance. As these types of accommodation do not typically come under Building Regulations, the revision allows manufacturers to produce homes that are fit for purpose and comfortable all year round.</p> <p>According to the BS, the Internal to external sound reduction should meet 35dB, exceeding the requirement of a 30dB reduction. The report therefore suggests that a condition is attached to any planning consent to ensure that the static caravans on site shall meet the specifications of BS3632:2015. It is acknowledged that the exposure of external amenity areas would exceed the recommendations, but due to the overhead nature of the noise source, further attenuation measures are not practicable. This will weigh modestly against the proposal in the planning balance."</p>

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REP/056 (2023)	Gatwick Airport Limited	H8	<p>H8: Gypsy, Traveller & Travelling Showpeople Sites 63. We objected to this policy in the 2020 Regulation 19 DCLP. However, in view of the fact that the 2021 Regulation 19 DCLP reinstated a policy (Policy GAT2) to safeguard land for a second runway, we no longer object to this policy as amended provided that Policy GAT2 is retained.</p> <p>Suggested Modifications:</p>
REP/113 (2023)	Natural England	H8	<p>Policy H8: Gypsy, Traveller and Travelling Showpeople Sites We support this policy's requirement for the site provision at Broadfield Kennels to ensure the requirements of the AONB Management Plan are satisfied. We also note that the site falls within the Sussex North WRZ, and as such should demonstrate water neutrality as appropriate. Our detailed comments with regard to water neutrality are set out within our comments for policy SDC4.</p> <p>Suggested Modifications:</p>
REP/138	Heine Planning Consultancy	H8	<p>see attached statement but in short:</p> <ul style="list-style-type: none"> - need is not properly assessed. - over reliance on a reserved site that does not appear to be deliverable and would fail to address existing need. No efforts have been made to find more suitable sites since 2015. - criteria policy are not reasonable, fair and potentially offend Public Sector Equality Duty and PPTS <p>Attached Supporting Document: <u>Reserve site: Broadfield Kennels</u></p> <ol style="list-style-type: none"> 1. The Council rely on a reserve site at Broadfield Kennels to provide 10 pitches. This site has a dangerous access from a bend on the A264 with a steep incline to the allocated land. The examining Inspector is invited to drive past and judge whether it would be realistic to expect slow moving vehicles towing caravans to pull off/ rejoin the A264 at this point without a deceleration/ acceleration lane and significant alteration to the gradient of the internal access road. I very much doubt this site would be deliverable without serious and major highway alterations the cost of which has never been made public. In my view it would certainly never be developed privately as the cost of highway improvements are likely to be prohibitive. 2. It is not good enough for Crawley Council to argue, as they have done previously, that this 'reserve' site was found acceptable for the 2015 local plan. It was one of only two sites put forward and both attracted much opposition. It is not known if the previous Inspector viewed the site. The fact is the Council has failed to develop this site for 8 years and has been unable/ unwilling to explain how individual families with a need for a site in this district could acquire the land and develop it for themselves. I do not accept that it is developable or

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			<p>will be made available. The Council seems unwilling to even make it available to address the immediate need and appear to have no idea how it would be developed.</p> <p>3. The Council has had 8 years since 2015 to find a better site with a good prospect of being made available. The need in Crawley would appear to be for small private sites and not for one large site-as proposed. There is an immediate need for 2 extended families on two unauthorised sites: one English Gypsies and the other Irish Travellers. It would be unrealistic to expect these families to share the single reserve site at Broadfield Kennels. The reserve allocation is therefore totally unsuitable to address the immediate need though it might serve as a socially provided site to address a general shortage, possibly for households stuck in housing or who have left the district due to the absence of provision.</p> <p><u>Criteria</u></p> <p>1. Criteria a will ensure new sites are not subject to unacceptable aircraft noise. Whilst in principal this requirement represents sound planning practice one has to question how committed the Council is to this policy given that they have failed since 2012 to make suitable alternative provision for a family with 3 households living in caravans on a site at Pullcotts Farm Nursery at the northern end of Peeks Brook Lane almost immediately under the flight path to Gatwick Airport and within the 60db night time noise contour and 66db day time noise contour. The 2021 Topic Paper did not even acknowledge the needs of this extended family. A 4 year temporary planning permission was granted 14 October 2013. An application was submitted in 2017 to renew consent and this was granted for a further 4 years until January 2022. In December 2021 a third application was made to renew consent and this is still awaiting a decision although the case officer emailed me in April 2022 to state that he had written it up for approval and was waiting for a manager to sign it off. The Council has been content to let an extended family live almost directly under the flight path for over 10 years whilst they fail to deliver the reserve site at Broadfield Kennels for this or any other families. Given a choice in the matter, the Martin family would prefer to remain on land they own and have lived on in their caravans since 2012, than relocate to a much larger site shared with other families with unknown management/ implementation costs. They are not troubled by aircraft noise.</p> <p>2. Criteria b would require the design and amenity impact of sites to be compatible with the surrounding area, particularly when located within residential areas or on land beyond the built up area boundary ie the countryside. If there is to be reliance on such a criteria Policy should at least explain where such development would be considered compatible. There is a real danger Criteria such as this will be relied on to thwart all new site provision (as is the case with the 2 pitch site at Radford Farm Road where issue was taken with a site largely screened by woodland, opposite housing and on land separated by a small field from a large sewage works with Gatwick airport structures/ railway line in more distant views). PPTS clearly envisages that Gypsy Traveller sites will be delivered outside settlement boundaries in the countryside and it is not a requirement that sites be hidden or only located on previously developed sites. It remains to be seen how the Council will</p>

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			<p>develop a 10 pitch site within the AONB close to a country park at Broadfield Kennels without giving rise to an incompatible design and amenity impact with the surrounding area. The design of caravans sites means that they almost always be out of keeping within bricks and mortar properties in built up areas or result in some localised impact in less developed areas. I feel that this criteria could be worded more positively to ensure sites are designed to assimilate into their surroundings rather than give objectors the perfect wording to object to every application-whether in a settlement boundary or beyond.</p> <p>3. Criteria d requires sites to be in a sustainable location but fails to explain what this means. Given the small size of Crawley I very much doubt any part of the district could be considered so isolated or remote from roads, services and facilities to be considered an unsustainable location and question if this criteria is really necessary. However the reserve site at Broadfield Kennels is probably about the most unsustainable location in the district. There is no pedestrian/ safe cycle route along the A264. It does not appear to be on any public transport route. It is not clear if access would be provided into Buchan Country park and then via a footbridge to the countryside centre and from there to the bus stop and shops at Bewbush. But it seems most likely that all journeys to/ from the site would have to be by car. With no right turn into the site off/ onto the A264 all journeys by car are extended up to/ back from the closest roundabouts.</p> <p>4. Criteria e requires that sites avoid undue pressure on infrastructure and community services. Given the very small need identified in the 2023 GTAA update is this criteria really necessary? The reserve site at Broadfield Kennels is for 10 pitches. If the 2023 GTAA update is to be believed, this would be greater than all existing pitches in the district yet is considered acceptable. As existing need is for small private family sites this criteria seems unnecessary from the outset.</p> <p>5. Criteria f states that proposed sites should meet an identified local accommodation need. This conflicts with para 24 (e) of PPTS which states that LPA should determine applications for sites from any travellers and not just those with local connections. I very much doubt that new housing in the district is restricted to local need and it would be most unfair to impose such a restriction on Travellers. This criteria offends the Public Sector Equality Duty. The Martin family at Peeks Brook Lane relocated from Wimbledon. The Casey family at Radford Farm Road relocated from near Maidstone in Kent. I have assisted families who have relocated from housing in Crawley to land outside Rusper (Capel Road) in Mole Valley due to the shortage of sites in Crawley. I do not recall Mole Valley Council objecting at the time to the fact they were addressing a need arising from outside their district. I strongly suspect that there remains a hidden need for more pitches for families who have been unable to live in Crawley, are living on rented pitches in adjoining districts e.g. Reigate, or have been forced to accept housing due to the absence/shortage of private/ socially provided sites in the district.</p>

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			<p><u>Need for sites</u></p> <ol style="list-style-type: none"> Justification to Policy H8 refers to the 2020 GTAA and draft 2023 update which identifies a need for up to 10 pitches. These GTAA's are just an update of the 2014 assessment which was based on a small sample size. The updates have been done in house and assumes that household will have remained relatively unchanged. The July 2022 biannual caravan count records that Crawley have failed to submit a single count since January 2019. A 2021 topic paper stated as follows <p><i>Gypsy, Traveller and Travelling Showpeople</i></p> <p><i>3.1.14 Notwithstanding the constrained land supply in Crawley, Duty to Cooperate agreements with the Gatwick Diamond Local Authorities confirmed the intention for each authority to seek to meet its own Gypsy, Traveller and Travelling Showpeople accommodation needs. As set out in the Crawley Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment, there is not an immediate need for new pitch or plot sites within the borough. However, there may be a need arising over the Plan period from the existing families within the borough as new households are formed. On this basis, the site allocated in the adopted Local Plan at Broadfield Kennels for up to 10 permanent residential pitch sites for Gypsy and Traveller use continues to be allocated for this purpose. There is no currently identified unmet need for Gypsies, Travellers or Travelling Showpeople arising from Crawley.</i></p> <p>This totally ignored the fact a site at Peeks Brook Lane had temporary consent</p> <ol style="list-style-type: none"> The 2023 draft GTAA relies heavily on census data which is an indicator of Traveller population levels but is not usually relied on by those doing need assessments. The majority of households in Crawley live in housing and this has increased quite significantly since 2011. The 2023 draft GTAA notes that fewer than 50% of these households were interviewed. The Council state that there are 3 private Traveller sites with 6 households but only provides details where two of these are, fails to account for the location of 7 other caravans and notes that there is one showpeople site with 3 households. There is no authorised social site provision within Crawley. The only option is housing or private sites. The absence of social provision means it is even more important that provision for small private sites is made/ identified. Submission policy H8 does not appear to acknowledge that there is an immediate need for sites. It refers to a reserve site for future need from Year 6. It states that on-going monitoring will ensure that 'any identified need .. is accommodated on the reserve site'. But it fails to state how the immediate need for pitches will be met. There is a current and immediate need for 3 households at Peeks Brook Lane and five households at Radford Road. If the need for 10 pitches is to be believed this would leave just 2 pitches for households from

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			<p>bricks and mortar (some of whom may also live in caravans in the grounds of their houses as on Balcombe Road), from other caravans on sites not identified, and from in migration. The 2023 draft GTAA states that in 2014 demand for sites was over estimated as there has been no request for a pitch site through the Council's housing register process. As there is no socially provided site in Crawley it is unclear why the Council think homeless Traveller families would apply for a site that does not exist. West Sussex CC confirmed August 2022 that they had 47 applicants who had applied for pitches on socially provided sites in the last 12 months in the County. There is clearly a need in the sub region.</p> <p>5. The draft GTAA helpfully lists planning application data since the 2015 local plan was adopted. It fails to point out that the Council has challenged the appeal decision letter for the Radford Rd site which was first occupied 2021. The Council are of the view the Inspector misunderstood the policy on aircraft noise when temporary permission was granted. The draft GTAA also omits any reference to the successful LDC application for a showman site at Fairhaven, Fernhill Road which authorised 2 additional mobile homes for residential use on a site which is in the same airport safeguarding zone as the Radford Rd and Peeks Brook Lane sites, and is also under the flight path to Gatwick airport where policy (existing and proposed) would not permit new residential development.</p> <p>6. Policy H8 states that the reserve site will be developable in years 6-15 ie 2029-2040. It will not be available to meet the immediate need including those with temporary permissions for up to 7 households. Broadfield Kennels has been a so called 'reserve site' since the 2015 Local Plan was adopted. The Council does not appear committed to addressing the immediate need in this district and is stalling for reasons that are not clear. As such the submission local plan is not legally compliant and fails to comply with the aims of national guidance in PPTs in respect of</p> <p>4b to ensure that LPAs develop fair and effective strategies to meet need through the identification of land for sites 4c to encourage LPAs to plan for sites over a reasonable timescale 4e to promote more private traveller site provision... 4f that plan making and decision making should aim to reduce the number of unauthorised developments. 4g for LPAs to ensure that their Local Plan includes fair, realistic and inclusive policies 4h to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.</p> <p>19. With reference to the section on plan making in the PPTS, Policy H8 fails to respect Policy B (10b) and the need to identify and update annually a supply of specific deliverable sites sufficient to provide a 5 years' worth of sites against their locally set targets. As footnote 3 explains, to be deliverable a site must be available now and achievable with a realistic prospect that development will be delivered on the site within 5 years. NPPF now has a more up-to-date definition for deliverable sites. Broadfield Kennels does not benefit from any planning permission and as noted above no costings or site schemes have been produced to show how it can be delivered.</p>

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			<p><u>Summary</u></p> <p>20. I am not convinced the Council has adequately assessed the need for Traveller pitches with regard to sites with temporary consent, households in bricks and mortar (including Travellers living in caravans in associations with bricks and mortar) and in migration.</p> <p>21. There is an immediate need for sites which policy does not acknowledge or address. Two private sites do not have permanent consent and are in the airport safeguarding zone where they are also affected by aircraft noise. A third site for Showmen is also in the airport safeguarding zone and may have to be relocated if the planned expansion of Gatwick airport is ever implemented.</p> <p>22. It is questionable whether the so called reserve site at Broadfield Kennels is suitable, available and / or developable due to the feasibility and cost of improving the existing access off a dual carriageway (A264) and whether the Council is really committed to delivering this site. No effort has been made to bring this forward since 2015. The provision of a single 10 pitch site would fail to address the immediate need for small private sites. But it might be suitable for a new socially provided site if it is not considered an unsustainable location. It is however difficult to see how future residents would access the site other than by private vehicle.</p> <p>23. It is not clear what (if any) other potential site options were considered given the failure to progress the reserve site.</p> <p>24. The criteria proposed are not especially fair or proportionate, or consistent with PPTS. They should be drafted in a more positive, realistic and constructive way to help address need and not thwart future provision or offend the Public Sector Equality Duty.</p> <p>25. For the above reasons draft Policy H8 is not positively prepared or legally compliant. It fails to comply with the clear guidance in PPTS to assess and address need. Whilst the need in Crawley is relatively low, this is a serious omission given the fact the 2015 Local Plan also failed to address need. At least one site has been occupied since 2012 with two temporary consents (with a third pending), and the Council does not appear to acknowledge or address this need in the submitted policy.</p> <p>Suggested Modifications: see attached statement but in short -need for a proper GTAA not just an update of the 2014 GTAA with accurate data and better identification/ consultation with families living in Crawley, with allowance for in migration for households who have had to leave the district and are prevented from living here due the absence of provision - recognition that there is an immediate need for small private family sites -the criteria should be drafted in a way to facilitate not thwart new development, reflecting the small size of the district, existing constraints, the size and nature of the need. -need to identify small family sites that are deliverable.</p>

Crawley

Local Plan

Environmental Sustainability

Regulation 19 Consultation May-June 2023 Representations
Local Plan Chapters 14 – 17, Noise Annex & Parking Standards Annex

Chapter 14. Green Infrastructure & Biodiversity			
Ref. No.	Respondent	Policy/ Para	Comments
REP/113 (2023)	Natural England		<p>Environmental sustainability statement</p> <p>We would note that The Environment Act became law in 2021, and that the 25-year Environment Plan was published and updated last month through the Environmental Improvement Plan (EIP). This legislation and the updated plans place great weight on biodiversity and nature recovery, with the apex goal of the EIP being “Improving Nature”. We would therefore suggest that the statement could be developed to give greater prominence to biodiversity, net gain and nature recovery.</p> <p>Suggested Modifications:</p>
REP/055 (2023)	Gatwick Green (Wilky)	GI1	<p>Introduction</p> <p>1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to Policy GI1 Green Infrastructure in the Draft Crawley Borough Local Plan, 2023 (DCBLP).</p> <p>1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation notes that Policy GI1 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2021) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy GI1.</p> <p>2.0 Policy GI1 – intention of policy and compliance</p> <p>Intention of the policy</p> <p>2.1 The purpose of Policy GI1 is to conserve and enhance the multi-functional green infrastructure network in Crawley so as to mitigate stress on the natural environment.</p> <p>2.2 Development within the Borough should protect and enhance the existing green infrastructure and take a positive approach to design and integration of new green infrastructure networks. Large-scale development is required to provide new links and incorporate blue infrastructure into the development design.</p> <p>National planning policy and guidance</p> <p>2.3 The NPPF sets out the objectives of the planning system with regard to contributing to enhancing the natural and local environment (para 174).</p>

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			<p>2.4 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on Green Infrastructure¹. PPG sets out what planning goals green infrastructure can achieve, including building a strong and competitive economy, achieving well-deigned places, promoting healthy and safe communities, mitigating climate change, flooding and coastal change and conserving and enhancing the natural environment.</p> <p>2.5 It is considered that Policy GI1 provides appropriate and proportionate protection for green infrastructure in the Borough, consistent with national planning policy and guidance. Policy GI1 has been designed to ensure that these matters are addressed in the planning process – in relation to Gatwick Green, this will include the preparation of a masterplan, and an outline planning application supported by an assessment of green infrastructure in accordance with the requirements in Strategic Policy EC4.</p> <p>3.0 Implications for Gatwick Green</p> <p>3.1 Most of the Gatwick Green allocation forms part of the Gatwick Woods Biodiversity Opportunity Area (BOA) to which Policy GI1 applies. The overall masterplanning of the Site under Strategic Policy EC4 will need to have regard to the BOA and any other green infrastructure considerations that arise from more detailed work. These considerations are reflected in the Development Framework Plan (DFP – Appendix 5 to GGL’s representation on Strategic Policy EC4) and will be taken into account in the design and operation of the proposals for the Site. These will include:</p> <ul style="list-style-type: none"> • The inclusion of landscape buffers and public open space to address separation of Gatwick Green from Gatwick Airport, Horley and the wider countryside. • The integration of trees, hedgerows and biodiversity into the layout and design and enhance blue/green infrastructure in the context of the Gatwick Woods Biodiversity Opportunity Area. • The integration of ‘important’ hedgerows and retaining a green buffer along Balcombe Road. <p>3.2 The Appendices to GGL’s representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council’s evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to green infrastructure are addressed in the 2020 Appendices and subject to Addenda / a new report contained at Appendices A – E of Appendix 3 to GGL’s representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.</p> <p>3.3 The Addenda to the Landscape Character and Visual Appraisal, the updated Preliminary Ecological Appraisal and the Hedgerows Assessment confirm that the Site can be developed whilst respecting the green infrastructure in and around it, and include recommendations on appropriate avoidance and mitigation measures. These matters will be addressed at the planning application stage and set out in reports on biodiversity, ecology and landscape matters and a Design and Access Statement.</p>

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			<p>4.0 Conclusions</p> <p>4.1 GGL acknowledges the need for the Gatwick Green proposals to address the green infrastructure considerations relating to the Site and referenced in Policy GI1. All feasibility investigations to date indicate that Gatwick Green can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.</p> <p>4.2 It is considered that Policy GI1 provides appropriate and proportionate requirements for the provision of green and blue infrastructure, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed to incorporate green infrastructure which interlinks with the existing network and will incorporate innovative drainage solutions appropriate for the Site's location in proximity to an airport.</p> <p>Suggested Modifications:</p>
REP/087 (2023)	Woodland Trust	GI1	<p>Policy GI1: Green Infrastructure</p> <p>We welcome this policy, in particular the requirement in point ix) that 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.</p> <p>We welcome the requirement in point vii) that 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 in line with Policy EP1.</p> <p>Suggested Modifications:</p>
REP/113 (2023)	Natural England	GI1	<p>Strategic Policy GI1: Green Infrastructure We welcome and support this policy with its reference to blue/green infrastructure protection, enhancement aims and the holistic projects approach adopted to provide improvements to the natural environment, increasing public enjoyment, promoting climate resilience and providing health benefits. We do note that reference could be made to Natural England's Green Infrastructure (GI) Framework and in particular, the updating of 'Accessible Natural Green Space Standards' (ANGSt) to Accessible Greenspace Standards (for further information please see below).</p> <p>Additionally, this policy could be further strengthened by expanding your list of blue/GI network to include other recognised elements (see the glossary in Natural England's GI Framework, by following the link provided below). As your policy simply refers to the blue green infrastructure network, it may be useful to ensure that the supporting text includes as definitive a list of these elements as possible.</p> <p>We note that the following are also recognised as blue/GI network elements: Vegetated sustainable drainage systems, SuDS, green roofs, blue roofs, rainwater harvesting and smart controls, downpipe disconnection planters, rain gardens and biofiltration strips, swales, ponds, detention basins, features for species (such as: bird and bat</p>

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			<p>boxes, swift bricks and hedgehog holes) and other miscellaneous featuring including: street trees, allotments, community gardens and orchards, private gardens, city farms, green walls, cemeteries and churchyards.</p> <p>Natural England's GI Framework Natural England's Green Infrastructure Framework can be used to develop GI policy and we recommend that plans refer to the 15 GI principles which set out the why, what and how to do good GI. The principles in conjunction with the Green Infrastructure Mapping Database - Beta Version 1.1 can be used to assist in planning GI strategically and inform policy</p> <p>Development should be based on the Green Infrastructure Principle What 4 - GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all.</p> <p>The plan should reflect the Green Infrastructure Principle Why 2 Active and healthy places to achieve - green neighbourhoods, green / blue spaces and green routes that support active lifestyles, community cohesion and nature connections that benefit physical and mental health and wellbeing, and quality of life. GI also helps to mitigate health risks such as urban heat stress, noise pollution, flooding, and poor air quality.</p> <p>Sustainable Drainage Systems (SuDS) should reflect Green Infrastructure Principle Why 4 - GI reduces flood risk, improves water quality and natural filtration, helps maintain the natural water cycle and sustainable drainage at local and catchment scales, reducing pressures on the water environment and infrastructure, bringing amenity, biodiversity, economic and other benefits. SuDs should be integrated and linked to green infrastructure beyond the site boundaries.</p> <p>Suggested Modifications:</p>
REP/055 (2023)	Gatwick Green (Wilky)	GI2	<p>Introduction</p> <p>1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to Policy GI2 Biodiversity Sites in the Draft Crawley Borough Local Plan, 2023 (DCBLP).</p> <p>1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>1.3 This representation notes that Policy GI2 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2021) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy GI2.</p> <p>2.0 Policy GI2 – intention of policy and compliance</p> <p>Intention of the policy</p> <p>2.1 The purpose of Policy GI2 is to identify the hierarchy of biodiversity sites; establish a sequential approach to addressing impacts on these with reference to the hierarchy of sites, and require planning applications to address these through surveys and assessments.</p> <p>2.2 In the hierarchy of biodiversity sites, international sites and SSSIs are afforded the highest level of protection, followed by Ancient Woodland and aged or veteran trees, and finally a number of locally designated sites including Biodiversity Opportunity Areas. Biodiversity Opportunity Areas have been identified throughout Sussex and are identified as areas that present the best opportunity for enhancing biodiversity, often being buffers around existing reserves or linkages between existing sites, and delivering Biodiversity Action Plan (BAP) targets.</p> <p>National planning policy and guidance</p> <p>2.3 Paragraph 174 of the NPPF requires planning policies and decisions to enhance the local and natural environment, including through net gains in biodiversity. The NPPF also requires plans to distinguish between the hierarchy of international, national and locally designated sites.</p> <p>2.4 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on biodiversity¹. PPG sets out guidance on the natural environment, the statutory basis for conserving and enhancing the natural environment and the approach to planning policies to achieve these objectives.</p> <p>2.5 It is considered that Policy GI2 provides appropriate and proportionate protection for biodiversity sites in the Borough, consistent with national planning policy and guidance. Policy GI2 has been designed to ensure that these matters are appropriately addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application supported by ecological assessments in accordance with the requirements in Strategic Policy EC4.</p> <p>3.0 Implications for Gatwick Green</p> <p>3.1 Most of the Gatwick Green allocation forms part of the Gatwick Woods Biodiversity Opportunity Area (BOA) to which Policy GI2 applies. The overall masterplanning of the Site under Strategic Policy EC4 will need to have regard to the BOA and any other biodiversity and ecology considerations that arise from more detailed work. These considerations are reflected in the Development Framework Plan (DFP – Appendix 5 to GGL’s representation on Strategic Policy EC4) and will be taken into account in the design and operation of the proposals for the Site. These will include:</p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<ul style="list-style-type: none"> • The integration of trees, hedgerows and biodiversity into the layout and design and enhance blue/green infrastructure in the context of the Gatwick Woods Biodiversity Opportunity Area. • The integration of 'important' hedgerows and retaining a green buffer along Balcombe Road. <p>3.2 The Appendices to GGL's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to biodiversity are addressed in the 2020 Appendices and subject to the updated Preliminary Ecological Appraisal (PEA) contained at Appendices A – E of Appendix 3 to GGL's representation on Strategic Policy EC4. The updated PEA confirms that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.</p> <p>3.3 The updated PEA confirms that the Site can be developed whilst respecting the biodiversity in and around it, and includes recommendations on appropriate avoidance and mitigation measures. These will be designed in accordance with the sequential approach to addressing harm contained in Policy GI2. These matters will be addressed at the planning application stage and set out in a report on biodiversity and ecology and a Design and Access Statement.</p> <p>4.0 Conclusions</p> <p>4.1 GGL acknowledges the need for the Gatwick Green proposals to address the biodiversity considerations relating to the Site and referenced in Policy GI2. All feasibility investigations to date indicate that Gatwick Green can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.</p> <p>4.2 It is considered that Policy GI2 provides appropriate and proportionate requirements for addressing biodiversity, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed to incorporate biodiversity, which interlinks with that on adjoining land, where appropriate.</p> <p>Suggested Modifications:</p>
REP/068 (2023)	Sussex Wildlife Trust	GI2	<p>SWT strongly supports the inclusion of this policy. SWT notes that our comments relating to policy GI2 made at the Jan 2021 Regulation 19 consultation have now been Incorporated into this most recent submission version of the plan.</p> <p>Suggested Modifications:</p>

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Ref. No.	Respondent	Policy/ Para	Comments
REP/087 (2023)	Woodland Trust	GI2	<p>Policy GI2: Biodiversity Sites</p> <p>We strongly support the policy that if significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated or as a last resort compensated then planning permission should be refused.</p> <p>We support the policy point 3) that 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, reflecting the National Planning Policy Framework (NPPF) 2021 (paragraph 180c).</p> <p>We strongly welcome the guidance in 14.22 that ancient wood pasture and historic parkland should receive the same consideration as other forms of ancient woodland.</p> <p>We welcome the recognition of the unique value of ancient woodland in 14.23 and guidance that a larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p> <p>We strongly welcome the guidance in 14.23 that 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, and that where ancient woodland is to be replaced by new woodland, this should aim to create 30 hectares of new woodland for every hectare lost.</p> <p>This reflects the guidance in the Trust's <i>Planners' Manual for ancient woodland (2019)</i>.</p> <p>Suggested Modifications:</p>
REP/113 (2023)	Natural England	GI2	<p>Strategic Policy GI2: Biodiversity Sites</p> <p>We support this policy's strong requirements regarding the protection of international/national designated sites and irreplaceable habitats in line with the requirements of the NPPF (paragraphs 174. 175. 179. 180.) and various goals and actions of the EIP.</p> <p>Suggested Modifications:</p>
REP/152	Save West of Ifield Campaign	GI2 14.27	<p>Both Ifield Brook Wood and Meadows and Willoughby Fields are identified specifically as designated Local Wildlife Sites (formerly SNCI's).</p> <p>Both of these sites are at risk from proposals for West of Ifield development and clarity is needed in these policies to make it clear that no development can take place on these sites including the Western Link Road and/or other transport infrastructure.</p> <p>Suggested Modifications:</p>

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Ref. No.	Respondent	Policy/ Para	Comments
REP/050 (2023)	Homes England	GI3	<p>Policy GI3: Biodiversity Net Gain</p> <p>Our 2021 Representations gave their support to this policy, welcoming the embrace of biodiversity net gain as a key metric for tracking success, however the 2021 Representations recommended that the metric used to judge biodiversity net gain should be biodiversity metric 3 as opposed to the suggest Biodiversity metric 2. The Policy has now gone further than this and has specified that that most up to date metric will now be used. This is supported as it allows for flexibility across the plan period.</p> <p>Homes England recognise both the importance and legal requirement for local plans to include biodiversity net gain targets and assessments and agree in principle with Policy GI3. However, the use of a January 2020 baseline, as opposed to a predevelopment baseline, neither serves a clear purpose nor is justifiable. In particular, the proposed approach within Policy GI3 conflicts with that set out within the Environment Act 2021, Schedule 14, Clause 5 which states that the pre-development baseline value is the value on the date of the application.</p> <p>Additionally, from a practical perspective, unless surveys have already been undertaken in 2020, it would not be possible to demonstrate the baseline position in that year. Indeed, the baseline position may have changed since 2020 and over the pre-developmental period as conditions and nature of land does not remain static. Thus, by not basing net gain calculations on an accurate pre development baseline at the time of an application, as set out within the Environment Act, there is a risk that the actual net gain that can be achieved on site cannot be clearly established.</p> <p>Lastly, the wording of policy GI3 should be amended to reflect that legislation is anticipated to exempt certain types of development from the requirement to achieve Biodiversity Net Gain, and to be flexible across the plan period as legislation or national policy may be updated.</p> <p>Suggested Modifications:</p> <p>Homes England proposes the following as alternative wording for the plan to be justified and sound: <i>Development proposals will be required to demonstrate how the scheme will meet the government's requirement for securing measurable 'net gains' 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 <u>with national policy and legislation</u> government expectations, currently a 10% increase in habitat value for wildlife compared with the pre-development baseline. This should be calculated using the government's most recently published Biodiversity Metric and be supported by relevant specialist ecological surveys, interpretation and advice The pre-development baseline will be taken from January 2020.. All developments, even with a pre-development baseline of Zero or low baseline will be expected to provide net gain.</i></p>
REP/055 (2023)	Gatwick Green (Wilky)	GI3	<p>1.0 Introduction</p> <p>1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous</p>

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			<p>representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to Policy GI3 Biodiversity and Net Gain in the Draft Crawley Borough Local Plan, 2023 (DCBLP).</p> <p>1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation notes that Policy GI3 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2021) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy GI3.</p> <p>2.0 Policy GI3 – intention of policy and compliance</p> <p>Intention of the policy</p> <p>2.1 The purpose of Policy GI3 is to ensure a net gain in biodiversity, with development proposals expected to incorporate features to encourage biodiversity and enhance existing features of nature conservation value. In line with the Environment Act 2021, the policy also requires development proposals to make provision for a 10% net gain in biodiversity.</p> <p>2.2 Policy GI3 contains some more detailed guidance with regard to provision for pollination, green roofs / walls, landscape proposals and tree planting.</p> <p>2.3 Larger development proposals, such as Gatwick Green, must also provide an Ecological Management Plan/Biodiversity Offset Management Plan. Trees and soft landscaping would normally be expected within the development site, although off-site mitigation may be acceptable.</p> <p>National planning policy and guidance</p> <p>2.3 Paragraph 174 of the NPPF requires planning policies and decisions to enhance the local and natural environment, including through net gains in biodiversity. The NPPF also requires plans to distinguish between the hierarchy of international, national and locally designated sites.</p> <p>2.4 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on biodiversity¹. PPG sets out guidance on the natural environment, the statutory basis for conserving and enhancing the natural environment and the approach to planning policies to achieve these objectives.</p>

¹ <https://www.gov.uk/guidance/natural-environment>

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>2.5 It is considered that Policy GI3 provides appropriate and proportionate guidance on the conservation and enhancement of biodiversity and the provision of net gain on sites in the Borough, consistent with national planning policy and guidance. Policy GI3 has been designed to ensure that these matters are appropriately addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application supported by ecological assessments in accordance with the requirements in Strategic Policy EC4.</p> <p>3.0 Implications for Gatwick Green</p> <p>3.1 Development proposals for Gatwick Green will need to incorporate features to encourage biodiversity, achieving a net gain of 10%. Biodiversity net gain should be provided in the first instance on-site, or otherwise off-site through work to provide a biodiversity uplift or by securing Biodiversity Credits. The provision of net gain will take into account the proposed large-format industrial and logistics uses for the site; the site's existing, and scope for, additional / replacement green infrastructure; connectivity with off-site green infrastructure / biodiversity; opportunities for habitat creation within the Gatwick Woods Biodiversity Opportunity Area (BOA) within which the site is located, and if necessary, the use of Biodiversity Credits.</p> <p>3.2 The overall masterplanning of the Site under Strategic Policy EC4 will need to have regard to the BOA and any other biodiversity and ecology considerations that arise from more detailed work. There will be a range of biodiversity considerations taken into account in the design and operation of the proposals for the Site. These will include:</p> <ul style="list-style-type: none"> • The integration of trees, hedgerows and biodiversity into the layout and design and enhance blue/green infrastructure in the context of the Gatwick Woods Biodiversity Opportunity Area. • The integration of 'important' hedgerows and retaining a green buffer along Balcombe Road. <p>3.3 The Appendices to GGL's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to biodiversity are addressed in the 2020 Appendices and subject to the updated Preliminary Ecological Appraisal (PEA) contained at Appendices A – E of Appendix 3 to GGL's representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.</p> <p>3.4 The updated PEA confirms that the Site can be developed whilst respecting the biodiversity in and around it, and includes recommendations on appropriate avoidance and mitigation measures. These will be designed in accordance with the sequential approach to addressing harm contained in Policy GI2. The proposals will also address the need to deliver a 10% net gain in biodiversity under Policy GI3. These matters will be addressed</p>

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			<p>at the planning application stage and set out in a report on biodiversity and ecology and a Design and Access Statement.</p> <p>4.0 Conclusions</p> <p>4.1 GGL acknowledges the need for the Gatwick Green proposals to address the biodiversity considerations relating to the Site referenced in Policy GI3, including a 10% net gain in biodiversity. The masterplan proposals for the Site required under Strategic Policy EC4 will comply with these provisions so as to achieve a sustainable and well-designed scheme for the Site.</p> <p>4.2 It is considered that Policy GI3 provides appropriate and proportionate requirements for addressing biodiversity and net gain, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed to incorporate biodiversity which interlinks with that on adjoining land, where appropriate. A 10% net gain in biodiversity will also be delivered in line with national policy and Policy GI3.</p> <p>Suggested Modifications:</p>
REP/068 (2023)	Sussex Wildlife Trust	GI3	<p>SWT supports the inclusion of a policy which sets out the need for the delivery of measurable net gain, in line with the National Planning Policy Framework 2021 and the Environment Act 2021.</p> <p>While we are supportive of the policy, we consider small elements of the policy wording need to be more clearly expressed to applicants.</p> <p>We would suggest that the policy must be clear from the outset that delivery of a measurable net gain to biodiversity will be in addition to the requirements of the Mitigation Hierarchy. It is important that this is clear to applicants, who may not be familiar with this process. This could be achieved by moving the paragraph that is currently last in the policy further up, to sit as the third paragraph. SWT would suggest this then makes clear that the Mitigation Hierarchy for an application must be established first. The policy can then go on to explain that in addition to this requirement, development must also deliver a net gain to biodiversity.</p> <p>Our other comment relating to clarity, is that the policy currently states: Developments that are of a smaller size should look to use the Urban Greening Factor criteria to achieve appropriate improvements and gains to the environment.</p> <p>We remind CBC that the Defra Metric does provide a Small Sites Metric in addition to the main metric. The Small Sites Metric2 is designed for small sites where priority habitats are not on site. SWT supports the use of the Urban Green Factor in the local plan policy for the appropriate sites. It is important to recognise that BNG and the Urban Green Factor provide two completely separate measurements and cannot be mixed. BNG concentrates on</p>

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			<p>ecological biodiversity while the UGF is more interested in the wider environmental benefits that green infrastructure can provide.</p> <p>As a result, it might be pertinent to consider that wording relating to the Urban Green Factor is not just related purely to size of the development.</p> <p>Suggested Modifications: SWT proposes that the policy must be clearer on the delivery mechanism for Biodiversity Net Gain. Currently the policy states: In the first instance 'net gains' should be sought on-site. If on-site is not feasible then offsite 'net gains' should be sought in the form of 'Biodiversity Credits'. Gains should be sought for perpetuity for the lifetime of the development. Any credits that are bought to deliver off-site Net Gains should demonstrate that they will be secured for at least 30 years via conditions or agreements.</p> <p>The policy currently seems to suggest that if BNG cannot be delivered on site then it jumps straight to it being sought off site in the form of biodiversity credits. SWT suggests the policy should highlight that net gain should be sought on site through the delivery of units, but if this is not possible then habitat creation off site through the delivery of units is pursued; and provide clarity that if BNG cannot be delivered through either of these means then it should take the form of Biodiversity Credits to be delivered as part of strategic solution with focus on the emerging Local Nature Recovery Strategy. SWT proposes the following amendments to the policy wording: In the first instance 'net gains' units should be sought on-site. If on-site is not feasible then delivery of offsite 'net gains' units should be identified as part of a strategic solution. Where neither of these options can be identified, net gains should be sought in the form of 'Biodiversity Credits' that can contribute to a strategic solution. Gains should be sought for perpetuity for the lifetime of the development. Any credits that are bought to deliver off-site Net Gains should demonstrate that they will be secured for at least 30 years via conditions or agreements. By adopting the proposed amendments, the policy would be in line with the guidance from Natural England.</p>
REP/087 (2023)	Woodland Trust	GI3	<p>Policy GI3: Biodiversity and Net Gain We welcome the requirement in this policy for at least one new tree, or equivalent soft landscaping, for each new dwelling and that these requirements would normally be expected to be met within the development site.</p> <p>We support the policy that 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.</p> <p>We note and welcome the guidance in 14.42 that replacement trees (Policy DD4) will not count towards biodiversity net gain.</p>

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			<p>We strongly welcome the guidance in 14.43 that where possible, UK sourced and grown tree stock should be used to support biodiversity and resilience.</p> <p>We strongly welcome the guidance in 14.44 that when landscaping schemes are proposed in lieu of on-site new tree planting, the planting scheme should be agreed with the council and must be justified on a case-by-case basis, considering the multiple benefits provided by trees.</p> <p>Suggested Modifications:</p>
REP/113 (2023)	Natural England	GI3	<p>Policy GI3: Biodiversity and Net Gain</p> <p>We welcome this policy and the aim of achieving a minimum percentage of biodiversity net gain of 10%. We welcome the inclusion of wording in the supporting text that relates to the objectives and priorities of the Nature Recovery Network and Local Nature Recovery Strategy. We would however recommend the following:</p> <ul style="list-style-type: none"> • The policy or its supporting text should make clear that BNG is required over and above meeting wider biodiversity good practice for planning and development. Development should continue to follow the mitigation hierarchy and achieve net gain in addition to this. • The policy or its supporting text should ensure that appropriate management and maintenance measures are in place throughout and after development. • In developing this policy for the Regulation 19 stage, we suggest that you may also want to think about the following and we would be happy to discuss further: • Have you outlined what biodiversity is at risk locally? Are you starting to think about how you wish to target your approach (e.g. onsite v offsite) and make it work in practice (rather than just making general statements)? • Have you considered your most important assets and their connectivity? Providing a map outlining these assets and opportunities is good practice. • Have you identified other relevant plans and strategies and cross referenced these? • Have you established the best and least favourable areas for BNG? Do you have evidence to underpin this? • Have you committed to further evidence gathering where gaps occur or to provide further detail to inform your options? • Have you considered the impact of your BNG approach on viability and the deliverability of emerging policies and allocations? <p>Suggested Modifications:</p>
REP/133 (2023)	The Planning Bureau	GI3	<p>Policy GI3 - Biodiversity and Net Gain</p> <p>Given the progress of the Environment Act and the introduction of a mandatory requirement for a minimum 10% biodiversity net gain the policy appears to have been amended. However, the policy at para 5, 11 and 12 tries to introduce a sequential approach to delivering BNG as well as going beyond the Environment Act in seeking gains into perpetuity by stating 'In the first instance 'net gains' should be sought on-site. If on-site is not feasible then offsite</p>

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			<p>'net gains' should be sought in the form of 'Biodiversity Credits'. Gains should be sought for perpetuity for the lifetime of the development. Any credits that are bought to deliver off-site Net Gains should demonstrate that they will be secured for at least 30 years via conditions or agreements' (para 5).</p> <p>In introducing a sequential preference, the Council should note that section 7.4 of the Natural England Biodiversity Metric 4.0 user guide ('the Metric'), March 2023 identifies a spatial risk multiplier that 'reflects the relationship between the location of on-site biodiversity loss and the location of off-site habitat compensation' (para 7.4.2). Para 7.4.2 confirms that: 'It affects the number of biodiversity units provided to a project by penalising proposals where off-site habitat is located at distance from the impact site'.</p> <p>Table 7.1 of the Metric then identifies the spatial risk score to be used for each habitat group depending on the location of the compensation site in comparison to the development site. For example, within the Local Planning Authority (LPA) Area or National Character Area (NCA) of the impact site the spatial risk score would be 1, if the compensation is outside LPA or NCA of impact site, but in neighbouring LPA or NCA the spatial risk score is 0.75. The Metric therefore already accommodates the distance away from the development site that the off-site BNG is proposed, with more BNG units being required the further away the compensation site is from the development site. The council should therefore delete the requirement and instead rely on the Metric.</p> <p>In addition, we note that para 10 is still pursuing a clear ambition to increase in tree cover in the Borough. However, as detailed in our 2021 representation, we are concerned that this may be an impediment to building at higher densities, particularly on previously developed sites in urban areas. The policies in the Local Plan try and deliver a wide-ranging number of objectives and in combination it does not appear feasible that new development, particularly on constrained urban sites, can meet them all. Is it credible to expect development with a minimum density of 200 dph (as detailed in Policy CL4) to increase the level of tree cover on site? We therefore recommend that para 10 of the policy is also deleted.</p> <p>Suggested Modifications: Recommendation: Delete para 5, 10, 11 and 12 of Policy G13 and instead rely on Natural England's Biodiversity Metric and the Environment Act.</p>
REP/154	DWDLPP on behalf of AITUP	G13	<p>Policy G13 requires at least 10% Biodiversity Net Gain and outlines the requirements for urban development that is unable to meet the needs on Site. The policy changes to reflect forthcoming mandatory 10% biodiversity net gain enforced by the Environment Act 2021 seem appropriate.</p> <p>Suggested Modifications:</p>
REP/151	Manor Royal BID	G13	<p>Biodiversity and Net Gain (Policy G13): The Manor Royal BID supports the objective of this policy to improve the Biodiversity of the town. Often this can only be achieved by long-range planning and site management. Sometimes offsite measures are required. Where this is necessary it should conform to a strategic level plan to avoid poorly</p>

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			<p>informed piecemeal investment in planting schemes out of keeping with vision and aspiration for the area. The Manor Royal BID has responded by introducing a new Objective (Sustain & Renew) as part of its new BID Business Plan (2023-28). This is informed by work undertaken by the BID with consultants BioRegional to develop a Sustainability Action Plan for Manor Royal using the “One Planet Living” framework. Not only does this consider the role of the BID in supporting local businesses, it also encompasses how the BID maintains the area and designs and delivers improvement projects e.g. the Microparks and public realm projects. The BID is in the progress of developing a Biodiversity Net Gain Plan to inform the sensitive planting and management of the public areas to achieve improved biodiversity across the Business District. Therefore; <u>The Manor Royal BID asks the Council to advise developers who are required to deliver or fund offsite measures in Manor Royal to achieve biodiversity net gain that their plans should be informed by the Manor Royal Biodiversity Net Gain Plan agreed in liaison with the Manor Royal BID.</u></p> <p>Suggested Modifications:</p>
REP/050 (2023)	Homes England	GI4	<p>Policy GI4: Local Green Space Homes England agrees with the council’s evaluation of the value and role of Ifield Brook Meadows and Rusper Road Playing Fields and supports the flexibility in the policy that allows for development in very special circumstances or where it enhances ‘<i>Local Green Space functions, for example through improvements to access, recreation and wildlife.</i>’</p> <p>Suggested Modifications: While the policy intention and identification of Local Green Spaces is supported, the current wording is not effective as it is not consistent with wider plan objectives and policy requirements. Wording should be updated to: <i>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 or where it supports other policies in this Plan</i></p>
REP/068 (2023)	Sussex Wildlife Trust	GI4	<p>SWT supports the Inclusion of this policy, as per our previous representation.</p> <p>Suggested Modifications:</p>
REP/113 (2023)	Natural England	GI4	<p>Strategic Policy GI4: Local Green Space We support the increased designation of Local Green Space in line with the aims of the NPPF (paragraphs 101.102.103.) and the aims of the EIP focused on creating and improving access to green spaces.</p> <p>Suggested Modifications:</p>

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REP/113 (2023)	Natural England	SDC1	<p>Strategic Policy SDC1: Sustainable Design and Construction</p> <p>We support this policy's requirements concerning climate change mitigation and adaption in line with the aims of the NPPF (section 14) and goal 7 of the EIP.</p> <p>Suggested Modifications:</p>
REP/133 (2023)	The Planning Bureau	SDC1	<p>Strategic Policy SDC1: Sustainable Design and Construction</p> <p>The Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions by 2050 is commendable. We feel however that the policy should be largely deleted and the council should instead rely upon the 2021 edition of the Building Regulations and the Future Homes Standards.</p> <p>Suggested Modifications:</p> <p>Recommendation</p> <p>Delete policy and instead rely on Part L of the Building Regulations and the Future Homes Standards.</p>
REP/154	DWDLIP on behalf of AITUP	SDC1	<p>Policies SDC1 and SDC3 provide appropriate support for low carbon, energy efficient, water efficient and sustainable development.</p> <p>Suggested Modifications:</p> <p>The recognition of embodied carbon in Policy SDC1 could be supplanted with specific support for refurbishment and refit where appropriate in overall sustainability terms.</p>
REP/151	Manor Royal BID	SDC1	<p>Sustainable Design and Construction (Policy SDC1)</p> <p>Living sustainably within our means has been shown to be increasingly important to businesses and developers. The Manor Royal BID has responded by introducing a new Objective (Sustain & Renew) as part of its new BID Business Plan (2023-28). This is informed by work undertaken by the BID with consultants BioRegional to develop a Sustainability Action Plan for Manor Royal using the "One Planet Living" framework. Not only does this consider the role of the BID in supporting local businesses, it also encompasses how the BID maintains the area and designs and delivers improvement projects e.g. the Microparks and public realm projects. It is also positive to see the ReEnergise Manor Royal (Local Energy Community) Project mention in the Local Plan (para 15.31), that is specifically focussed on how companies work collaboratively through a not-for-cooperative model to facilitate easier, quicker and cheaper deployment a solar panels. In the future this may well also include aspects of storage and sharing. Therefore; <i>The Manor Royal BID asks that the Council consider how it might make applicants aware of ReEnergise Manor Royal when advising on planning applications in order to benefit the development and the advancement of renewable energy through the deployment of solar panels in Manor Royal. It also asks that the Council liaise with Gatwick Airport and consider introducing a policy to provide certainty to installers, including ReEnergise Manor Royal, concerning the Aerodrome Safeguarding.</i></p> <p>Suggested Modifications:</p>
REP/161	Resident 66	SA/SEA SDC1	Adoption of BREEAM Standard instead of Passiv Haus standards of building BREEAM standards vary considerably between a 30% "Pass" to an 85% "Excellent". Nowhere does it specify the what level of BREEAM

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			<p>standard will be required. This conflicts with the Crawley Borough Council Climate Emergency Action Plan of 2021 which recommends Passiv Haus adoption. Passiv Haus standards are more specific and rigorous. They are also more limited in their breadth of cover.</p> <p>Suggested Modifications: Specify the minimum BREEAM standard. Also specify the use of the Passiv Haus standard.</p>
REP/062	Environment Agency	SDC3 15.34	<p>Page 219, 15.34, on “As well as applying to the demand for public water supplies, it is also an environmental issue that 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.”</p> <p>Comment: More information needs to be provided on the direct and indirect relationship between ensuring water supply and impacts on water quality. The Local Plan should provide more information on how ‘good status’ will be ensured under the Water Environment (Water Framework Directive) (England and Wales) Regulations.</p> <p>Suggested Modifications:</p>
REP/113 (2023)	Natural England	SDC3	<p>Policy SDC3: Tackling Water Stress</p> <p>Natural England supports this policy’s clear delineation between standard development and development coming forward within the Sussex North Water Resource Zone (WRZ) and the inclusion of a separate policy NE17 to cover this. We support this policy’s water efficiency requirements regarding both residential and non-domestic development outside of the WRZ. However we would also strongly support encouragement of lower water efficiency rates for new development and advise that the policy wording could be made stronger, to emphasise that 110 litres per person per day is the maximum rate. Additionally greater encouragement should be given for new developments to achieve lower water efficiency ratings.</p> <p>Suggested Modifications: We therefore advise that additional signposting of the Waterwise UK Water Efficiency Strategy to 2030, should be included either within the policy wording supporting text; the Waterwise UK Water Efficiency Strategy to 2030 can provide additional guidance on delivering greater water efficiency in the UK by 2030.</p>
REP/143	CPRE Sussex	SDC3 / Para 15.34 – 15.40	<p>CPRE Sussex is concerned that the plan seems not to recognise that whether Crawley Borough’s need for potable water can be fully met over the plan period is uncertain, and therefore not assured. The plan should adopt a precautionary approach to this vital issue by explicitly acknowledging the uncertainty, for the reasons explained below.</p> <p>Explanation</p> <p>1. The plan acknowledges that ‘The South East, including Crawley, is an area of serious water stress, whereby demand for water exceeds the available supply’ (paragraphs 15.5, 15.23, 15,34).</p>

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			<p>2. The plan's underlying assumptions are that water consumption can be reduced to specified levels by the measures identified in the plan, notably by reducing consumption (paragraph 15.5, 15.9, 15.36, 15.40), and that water companies will have the capability, including water capture and storage capacity and delivery-infrastructure needed to meet Crawley's overall demand for potable water throughout the plan period.</p> <p>3. Whether the identified measures will succeed in reducing the demand for potable water to a level not exceeding the available supply, and whether the water companies will be capable of meeting increasing demand over the plan period is, however, uncertain.</p> <p>4. Sussex North Water Neutrality Study: Part C – Mitigation Strategy Final Report November 2022 states under the heading 'Uncertainty in Southern Water figures', at paragraph 114, that "Although Southern Water are committed to their programme of water demand reduction through their current WRMP, there is a risk that the targeted reductions in per capita consumption published in their Water Resources Market Information tables (July 2020) may not be met. This could occur for several reasons, a recent example being Covid-19 causing a delay to the household visit programme. Drought and prolonged dry weather are also factors that have contributed to increased water demand".</p> <p>5. Meanwhile, across parts of Sussex and Kent, Southeast Water has been unable to meet demand, saying that prolonged dry weather over the last six weeks had placed extra pressure on local supply. Consequently, households, schools and businesses were without tap water, and a hosepipe ban has been imposed. https://www.bbc.co.uk/news/articles/c809155nk65o?at_medium=RSS&at_campaign=KARANGA</p> <p>6 Last year during the prolonged drought some communities in both East and West Sussex and Surrey had their water supplies cut off leaving residents without tap water for several days.</p> <p>7 Note, too, the report featured in the Guardian (15 June 2023): 'Drought is on the verge of becoming the next pandemic' that Andrew Tucker, water efficiency manager at Thames Water reportedly advised the news paper that quote "in London and the south-east, "we basically don't have enough product, going forward. Ultimately, we will need to bring new water supply into the system ... All water companies in the UK rely on winter rainfall to recharge these systems ... If we don't get that winter recharge, it just drops and keeps on dropping, because our raw water storage [reservoirs] is actually quite small". https://www.theguardian.com/news/2023/jun/15/drought-is-on-the-verge-of-becoming-the-next-pandemic?ref=upstract.com</p> <p>7.1 On 3rd May this year, the BBC News reported that 'An estimated 3,000 properties have been affected by water supply issues in Surrey. Residents in parts of Chiddingfold and Dunsfold have reported no water or low pressure on Wednesday. Thames Water has said its Ashlands Reservoir is out of service after a technical issue</p>

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			<p>at Mousehill Water Treatment Works, late on Tuesday. Thames Water also said there were technical issues at Netley Mill Water Treatment Works in the early hours of Tuesday'. https://www.bbc.co.uk/news/articles/c5148j9l3x1o?at_medium=RSS&at_campaign=KARANGA</p> <p>7.2 On 31 August 2022, BBC News reported that 'People in parts of Surrey have no water or low pressure, on one of the hottest days of the year. Thames Water said there were technical issues at Netley Mill Water Treatment Works and the fix was "taking longer than we hoped". A spokesman apologised, adding: "We know how disruptive and worrying it is to be without water." https://www.bbc.co.uk/news/uk-england-surrey-62532910</p> <p>8. On 14th May this year, BBC News reported that 'A failure at a water supply plant has left properties across West Sussex with little or no water. Southern Water said the outage followed low levels of chlorine at its Hardham water supply works. The company said 20,000 customers were affected and expected the number to grow to 40,000 throughout Sunday. The company had said Horsham, Billingham, Broadbridge Heath, Pulborough, Codmore Hill, West Chiltington, Wisborough Green, Rudgwick, Loxwood, Barns Green and Slinfold had all had supplies disrupted'. https://www.bbc.co.uk/news/uk-england-sussex-65588380</p> <p>Conclusion</p> <p>9. CPRE Sussex recommends that as a precautionary measure the uncertainty as to whether Crawley Borough's need for potable water can be fully met over the plan period, 2024 – 2040, be acknowledged and stated in the plan.</p> <p>Suggested Modifications: To make the policy sound, CPRE Sussex recommends that as a precautionary measure the uncertainty as to whether Crawley Borough's need for potable water can be fully met over the plan period, 2024 – 2040 be acknowledged and stated in the plan. Suggested wording to convey this uncertainty is: 'There is uncertainty as to whether Crawley Borough's need for potable water can be fully met over the plan period, 2024 – 2040'.</p>
REP/154	DWDLIP on behalf of AITUP	SDC3	<p>Policies SDC1 and SDC3 provide appropriate support for low carbon, energy efficient, water efficient and sustainable development.</p> <p>Suggested Modifications:</p>
REP/021 (2023)	Gladman Developments	SCD4 Viability	<p>Policy SCD4: Water Neutrality Gladman do have any specific comments regarding the requirements of this above policy but consider that it would be more appropriate to await the outcome of the WRZ offsetting scheme which is currently at business case stage.</p>

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			<p>This will provide a more comprehensive approach with strategies and planning policies aligned across the affected authorities and fully justify and support the deliverability of the Local Plan.</p> <p>Viability Gladman note the updated Viability Assessment (December 2022) which is primarily in relation to WRZ and the cost of mitigation solutions for new developments.</p> <p>The Council anticipate that the cost of mitigation will reduce once improvement measures are introduced by Southern Water, but at present such cost calculations are assumptions supported by the Sussex North Water Neutrality Study. On this basis, the viability study states that Council have considered that £2,000 per dwellings as a reasonable assumption to achieve the standards.</p> <p>However, the water neutrality study sets out a number of mitigation solutions which is usefully summarised within the Joint Water Neutrality Topic Paper. Paragraph 3.27(2) states that to achieve the water efficiency standard of 85 litres per day, per person the following measures can be employed and the associated costs:</p> <ul style="list-style-type: none"> - Fittings-based approach: between £349 and £431; - Fittings-based approach if appliances are not part of the standard fit-out: between £1,049 and £1,531; and - Greywater recycling: between £4,000 and £4,340. <p>This suggests that it may be more costly to deliver water efficiency standards than is considered in the viability study. Therefore, it is necessary to update the viability study to account for the higher cost scenario.</p> <p>Furthermore, these approaches do not account for the emerging offsetting scheme and the cost for developers to access the scheme, which have not been finalised yet. This is a considerable uncertainty which has not been factored into the updated viability study.</p> <p>The above highlights further reasons to await further clarification on water neutrality issues to properly justify the requirements of the Local Plan and ensure that all of the identified development needs of the borough are met.</p> <p>CONCLUSIONS Summary Gladman welcomes the opportunity to comment on the Regulation 19(3) consultation that is being undertaken by Crawley Borough Council. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2021) and the associated updates that were made to Planning Practice Guidance.</p> <p>Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.</p>

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			<p>At present, Gladman have significant concerns regarding the proposed Crawley Borough Council Local Plan and it's ability to deliver the full residential and employment needs for the borough. It is considered that the Regulation 19 consultation is premature given that there are existing significant uncertainties existing in relation to water neutrality and proposed offsetting scheme with the required evidential justifications not yet finalised. The current iteration of the Local Plan cannot be considered to be positively prepared, effective or justified.</p> <p>Suggested Modifications:</p>
REP/033	Horsham District Council	SDC4	<p>Policy SDC4: Water Neutrality We strongly support this policy.</p> <p>The policy recognises the importance of water neutrality across the Sussex North Water Resource Zone (WRZ) and sets out a policy framework to ensure that new development will comply with water neutrality requirements. The policy is based on joint evidence base prepared with HDC, Chichester District Council and other partners. It has been endorsed by Natural England and refers to a joint local authority-led offsetting scheme which is being proactively progressed.</p> <p>It is intended that the same policy wording will be included in the HDC Local Plan and already features in the Chichester District Regulation 19 version of their Local Plan. It is considered imperative that a consistent policy approach across the WRZ be applied as it is the most effective way to deal with water neutrality in a way which can maximise growth and investment within the respective LPA's and takes forward the recommendations of the joint evidence base.</p> <p>We do not seek wording changes to the policy but wish to be advised of any proposed changes to the policy wording that may emerge through the examination process to ensure that a consistent approach is maintained.</p> <p>Suggested Modifications:</p>
REP/035	Ardmore Ltd.	SDC4	<p>Policy SDC4: Water Neutrality Following the announcement back in March 2020 and the Position Statement from Natural England in September 2021, the project team have been working closely with our clients and CBC to support the cross authority working across the Sussex North Water Supply Zone (WRZ). With Part C of the 3-tier report being published in December 2022, and a new project manager for all authorities having been secured it is evident that work towards the mitigation and offsetting is being developed.</p> <p>We have reviewed the Joint Topic Paper by Chichester District Council (CDC), Crawley Borough Council (CBC), Horsham District Council (HDC), Mid Sussex District Council (MSDC), South Downs National Park Authority (SDNPA) and West Sussex County Council (WSSCC) and whilst the issue frustrates development we welcome the</p>

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			<p>cross-boundary approach to ensure consistency across the LPAs. We also welcome the joint JBA evidence base to underpin all LPAs Local Plan Reviews.</p> <p>Section 6.0 of the CBC Sustainability Appraisal considers the need for the Local Plan to adequately address Water Neutrality, and any potential offsetting or reasonable alternatives. We agree that the 2015 local plan tested that the area was an area of Water Stress, and that JBA Part C report identifies 3 credits within the Water WAT01 Water consumption issue category for BREEAM or 85l/p/d known as a reasonable achievable target. This is agreed in the statement of common ground between all effected LPAS and the joint topic paper. Para 6.15 of the SA states that the potential for both water efficiency and offsetting are finite, thus constraining the amount of development possible in an area. Para 6.16 continues that “<i>The Water Neutrality Part C study notes that, jointly, the local planning authorities in the Sussex North Water Resource Zone (WRZ) propose to deliver nearly 20,000 units between them.</i>”</p> <p>The table of SA Objective assessment against policy SDC4 shows a double negative score against the objective 5 that aims to “<i>5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.</i>”</p> <p>Whilst we agree with the SA objective 5, we note that any further restriction to employment opportunities as result of Water Neutrality will further limit the town’s ability to meet its local or regional economic needs and contradict with policy EC1.</p> <p>Following the significant delay to the Local Plan as a result, we welcome the SoCG with the adjacent authorities and WSCC and seek further clarification on the mitigation and offsetting measures as they become available.</p> <p>For our client, there is additional 3.67 hectares of current agricultural land to the North of the Jersey Farm site that will allow an opportunity for offsetting, and mitigation in addition to any formal procedures identified by the LPAs.</p> <p>In the Joint Authorities Water Neutrality Topic Paper May 2023 prepared by CBC in support of the Local Plan Review, paragraph 15.51 confirms this development will be able to demonstrate how water neutrality will be achieved through a Water Neutrality Statement to be submitted as part of any planning application.</p> <p>Suggested Modifications: We support the additional clarity in policy SD4 regarding a potential LPA led offsetting scheme and the opportunity to explore alternative water extraction, and that any development will need to produce a water neutrality statement. We agree with Policy SD4 but note that this issue is another constraint to sustainable economic development in the region.</p>
REP/063	Persimmon Homes	SDC4	The requirement by Policy SDC4 for water neutrality statements under criterion 4 is not justified where development proposals are connected to water supply sources that are not within the Sussex North Water

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			<p>Resource Zone. In particular, it is unnecessary for details to be provided of offsetting proposals as indicated by criterion 5.</p> <p>Suggested Modifications: To address the requirement for water neutrality statements where developments are not being connected to the Sussex North Water Resource zone, the text of criteria 4 and 5 should be swapped and be made clear that offsetting details are not necessary in those circumstances.</p>
REP/068 (2023)	Sussex Wildlife Trust	SDC4	<p>Sussex Wildlife Trust welcomes the Inclusion of this new policy in light of Natural England's findings, which relate to impacts on Protected Sites within the Sussex North Water Resource Zone. We recognise the inclusions of these Water Neutrality Policies in the Local Plans of the Local Authorities within the Sussex North Water Resource Zone are emerging and therefore their effectiveness has yet to be tested.</p> <p>We do draw CBC's attention to the fact that the current policy wording in the submission plan does not seem to state the need for 'off setting' to be in place ahead of occupation of properties.</p> <p>This is not consistent with the Sussex North Water Neutrality Study: Part C – Mitigation Strategy Final Report, November 2022, which stipulates that: “Offsetting must be in place before the water demand is generated, for instance before new houses are occupied. If it is not possible to provide sufficient offsetting, either because it cannot be delivered fast enough, or there is not enough available offsetting to meet demand, this will restrict the amount of growth that can go ahead.” (Paragraph viii).</p> <p>We note that the Monitoring report states that 'Net change in water demand within the part of Crawley which falls within the Sussex North Water Resource Zone.' Is this a consistent approach with the other LPA monitoring?</p> <p>Suggested Modifications: We propose an addition to the policy: <i>Offsetting must be in place and operational before occupation of dwellings occurs.</i></p>
REP/113 (2023)	Natural England	SDC4 15.42	<p>Sets out that development in the WRZ is supplied from the Pulborough abstraction. Could improve clarity by stating which aquifer is specifically being impacted by the Pulborough abstractions.</p> <p>Suggested Modifications: “Sussex North WRZ is supplied from ground water abstraction, from the Folkestone beds of the Lower Greensand/Wealden Greensand semi-confined aquifer,...”</p>
REP/113 (2023)	Natural England	SDC4 15.43	<p>Sets out requirement to achieve WN for developments coming forward. Could add wording to clarify that achieving WN is one of the most readily available methods to rule out AEOI, but not the only method.</p> <p>Suggested Modifications: “To provide the necessary certainty, the most feasible approach is for development must to demonstrate that it is water neutral.”</p>

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REP/113 (2023)	Natural England	SDC4 15.45	<p>As the final strategy is not out yet, we advise that either this, or another appropriate, paragraph should also include some discussion as to why achieving 85lppd is critical for the offsetting scheme's viability. Should add wording to make apparent within this local plan why these tighter measures are required before offsetting should be considered, given that the final plan is not yet published.</p> <p>Suggested Modifications: "... (OIS) being prepared; Note that achieving the aforementioned higher levels of efficiency will enable the OIS to provide necessary offsetting more effectively, thereby reducing offsetting costs and ensuring viability for all development within the WRZ. Development may choose...</p>
REP/113 (2023)	Natural England	SDC4	<p>Overall we are satisfied that the policy requirements are sufficient to rule out an adverse effect on integrity (AEOI) from this plan on the Arun Valley designated sites resultant from increased abstraction at Pulborough, from the Folkestone beds of the Lower Greensand/Wealden Greensand semi-confined aquifer. Policy requirement 1 is robust and clearly defines general requirements to rule out an AEOI. Policy requirements 2 and 3 are robust and suitably set out that a strategic offsetting strategy is being developed which should make achieving requirement 1 significantly easier for the allocations of this plan. Policy requirement 4, while useful to include, should include wording to make clear that where alternative water supply is being proposed as a method to avoid AEOI the statement will also need to demonstrate that deliverability of this water supply is certain for the lifetime of the development. As such we would suggest the following example wording:</p> <p>"4. Where an alternative water supply is to be provided, the statement will need to demonstrate that no water is utilised from sources that supply the Sussex North WRZ. The wider acceptability of and certainty of delivery for alternative water supplies will be considered on a case-by-case basis."</p> <p>Adding this wording will make apparent to developers seeking alternative supply as an AEOI avoidance measure, what will be required of them by the Habitats Regulations in line with the People Over Wind ruling.</p> <p>This will have the benefit of ensuring this policy requirement does not unintentionally encourage a proliferation of developers seeking inappropriate water supply solutions while also giving your authority more confidence to reject such inappropriate proposals at an early stage, which should save your authority and developers time and resources.</p> <p>Policy requirement 5 is also robust and clearly defines the 3 key aspects of a WN statement which are required as a minimum to demonstrate that AEOI on the Arun Valley sites resulting from additional abstraction can be ruled out.</p> <p>Suggested Modifications: We would suggest the following example wording: "4. Where an alternative water supply is to be provided, the statement will need to demonstrate that no water is utilised from sources that supply the Sussex North WRZ. The wider acceptability of and certainty of delivery for alternative water supplies will be considered on a case-by-case basis."</p>

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REP/130 (2023)	Home Builders Federation	SDC4	<p>Response by the Home Builders Federation to the consultation on the amendments to the Submission Draft of the Crawley Local Plan</p> <p>1. Thank you for consulting the Home Builders Federation (HBF) on the amendments to the submission draft of the Crawley Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.</p> <p>2. The key change to the local plan being proposed in this third regulation 19 consultation is the inclusion of policy SDC4: Water Neutrality. This policy is considered to be necessary to ensure that new development delivered through this local plan does not impact negatively on the quality of the protected sites in the Arun Valley and provides the basis for the implementation of the mitigation strategy set out in part c of the Sussex North Water Neutrality Strategy. In addition to this new policy the Council have also made some factual changes including the level of unmet needs arising from this local plan.</p> <p>SDC4: Water Neutrality</p> <p>3. The concern regarding the declining quality of the protected sites and the link that has been made to water abstraction within the Sussex North Water Resource Zone (WRZ) was raised by Natural England in 2021 and as a result a moratorium on development was placed on development in this area. Whilst the HBF welcomes the efforts made by the Councils in this area to seek to mitigate the potential impacts on protected habitats arising from development to ensure that the pressing need for new homes in Crawley and its neighbours can be met we are concerned that responsibility for maintaining the quality of protected habitats is once again being placed on the development industry.</p> <p>4. It is the responsibility of Southern Water to ensure a resilient and sustainable supply of water to support existing and future customers with the approach to achieving this being set out in the Water Resource Management Plan adopted in 2019. It is for Southern Water to identify a means of maintaining a level of water abstraction to ensure the delivery of new homes expected to be planned for in local plans without impacting negatively on any protected areas. Whilst Southern Water is working to reduce leaks in the water supply network it will fall on the development industry to ensure that the remaining capacity required to achieve water neutrality is delivered through a combination of water efficiency measures and offsetting.</p> <p>5. Therefore, whilst the policy provides a mechanism for ensuring new development can come forward, we would question whether it should be necessary given that it is Southern Water's statutory responsibility to provide water for planned levels of new development without impacting negatively on protected habitats. Therefore, as the Local Plan progresses, should further evidence arise with regard to the impact of water abstraction on the protected sites or the role of Southern Water in ensuring a resilient water supply in the area, consideration may need to be given as to the necessity of this policy.</p>

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			<p>Suggested Modifications:</p> <p>6. Therefore, in order to ensure the soundness of this policy the wording should be amended slightly to recognise that further evidence or alternative mitigation measures may be identified that removes the need for the policy and the requirement to offset water use as is proposed. The HBF recommends part 1 is amended to read, “<i>Subject to further evidence or alternative mitigation measures being secured ...</i>”. This amendment will ensure the policy is sufficiently flexibility to take account of any changes in the situation with regard to water abstraction and the protected habitats.</p> <p>7. Finally, to ensure this policy is deliverable it will be necessary for the Council to show that the proposed offsetting scheme will be operational prior to the adoption of the local plan. At present there is very little detail as to whether sufficient credits can be made available to support the delivery of this local plan as well as development expected to come forward in both Horsham and Chichester. This should be a priority for the Council and its partners.</p>
REP/143	CPRE Sussex	SDC4	<p>1. CPRE Sussex strongly recommends that Policy SDC4: Water Neutrality: stipulates that offsetting must be in place before water demand is generated, for instance before new houses are occupied.</p> <p>1.1 Sussex North Water Neutrality Study: Part C – Mitigation Strategy Final Report, November 2022, stipulates that: “Offsetting must be in place before the water demand is generated, for instance before new houses are occupied. If it is not possible to provide sufficient offsetting, either because it cannot be delivered fast enough, or there is not enough available offsetting to meet demand, this will restrict the amount of growth that can go ahead” (paragraph viii).</p> <p>1.2 This critical requirement is restated in the Crawley Borough Council Local Plan Review Sustainability Appraisal/Strategic Environmental Drat Report for the Submission Local Plan May 2023 (paragraph 6.31),</p> <p>1.3 It is not, however, stipulated in the Crawley Submission Draft Local Plan Policy SDC4: Water Neutrality.</p> <p>1.4 CPRE Sussex strongly recommends that the critical requirement that ‘Offsetting schemes must be in place before the water demand is generated, for instance before new houses are occupied’ be stipulated in the Policy.</p> <p>2. CPRE Sussex strongly recommends that to ensure that the defined target for water efficiency is met, Policy SDC4: Water Neutrality include the essential requirement for a targeted programme to raise awareness of why water saving is needed, and the correct use and maintenance of the fittings and fixtures installed.</p> <p>2.1 Sussex North Water Neutrality Study: Part C – Mitigation Strategy Final Report November 2022 stipulates: “Setting a tighter standard for water efficiency does not guarantee that the eventual water-use in a development will be as expected, or that it will stay at the designed figure. Ensuring the defined target for water efficiency is</p>

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			<p>met will also require an element of behaviour change. A targeted programme to raise awareness of why water saving is needed, and the correct use and maintenance of the fittings and fixtures installed is therefore required” (page vii).</p> <p>2.2 This essential requirement for a ‘targeted programme to raise awareness of why water saving is needed, and the correct use and maintenance of the fittings and fixtures installed’ to ensure that the defined target for water efficiency is met is not stated in the Crawley Submission Draft Local Plan.</p> <p>2.3 CPRE Sussex therefore strongly recommends that this essential requirement be stipulated in Policy SDC4: Water Neutrality.</p> <p>Suggested Modifications: Why the wording proposed below for addition to Policy SDC4: Water Neutrality would strengthen and thereby make sound the policy is explained above. The proposed wording is as follows:</p> <p>i. Water offsetting schemes must be in place before the water demand is generated, for instance before new houses are occupied. And:</p> <p>ii. To ensure that the defined target for water efficiency is met and water neutrality achieved Crawley Borough Council will initiate a targeted educational programme to raise awareness of why water saving is needed, and the correct use and maintenance of the fittings and fixtures installed.</p>
REP/152	Save West of Ifield Campaign	SDC4	<p>SWOI comment There is no mention of planning permission required for installation of swimming pools in back gardens or water features that require regular topping up. The document should be amended: “New planning restrictions will be imposed for the building of swimming pools in gardens”. Although grey water harvesting is mentioned in the plan there does not appear to be any policies to encourage residents to retrofit or the council to retrofit their own buildings.</p> <p>Suggested Modifications:</p>
REP/154	DWDLIP on behalf of AITUP	SDC4	<p>Water Neutrality: The AIPUT Sites and Gatwick Airport are located outside the Sussex North Water Resource Zone and the Upper Beeding Water Resources Zone hence any future planning applications here are not expected to require a Water Neutrality Statement under Policy SDC4 (Water Neutrality).</p> <p>Suggested Modifications:</p>
REP/151	Manor Royal BID	SDC4	<p>Water Neutrality (Policy SDC4) Water Neutrality is taken to mean that <i>for every new development, total water use in the region after the development must be equal to or less than the total water-use in the region before the new development</i>. In practical terms this means first reducing demand for water from the new development as far as practicable, and then offsetting the remaining demand elsewhere within the same region. The vast majority of</p>

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			<p>the water for the Manor Royal Business District is supplied from the Sussex North Water Resource Zone (WRZ) requiring development, including change of use, to demonstrate water neutrality through water efficient design and offsetting of any net additional water use.</p> <p>The introduction of a Local Planning Authority (LPA)-led water offsetting scheme is welcomed where this can unlock frustrated development in Manor Royal, and provided water credits generated in Crawley are not lost to the town, particularly those generated in Manor Royal. It is noted that it will not be a requirement for developers to use the LPA-led scheme leaving the option open for developers to propose other offsetting that might be deployed within the impacted WRZ. Clear guidance will need to be provided by the LPA on acceptable offsetting arrangements and advice needs to be practical and prompt.</p> <p>Para 15.44 states that non-residential buildings are required to achieve 3 credits within the BREEAM water issue category. This may include incorporating a range of measures, such as greywater recycling and rainwater harvesting into the design of new development, and fitting water saving fixtures such as flow regulators, low flush toilets, low volume bath, aerated taps and water efficient appliances (in particular, washing machines and dishwashers).</p> <p>Para 15.45 states that any additional demand arising from development will need to be offset against existing supplies. It is envisaged that this will be achieved through demand management savings identified in Southern Water's Water Resource Management Plan, together with measures to be identified in a joint Local Planning Authority-led Offsetting Implementation Scheme (OIS) being prepared. Developers wishing to access the LPA-Led Offsetting Implementation Scheme (OIS) will have to "buy in" to the scheme in accordance with a series of stated obligations. However, to comply and receive planning consent, sufficient water capacity must be provided prior to permission being granted that might mean delays at various points in the plan period while the necessary offsetting is delivered prior to approval (para 15.49).</p> <p>This is a severe constraint that has frustrated the development of Manor Royal with the potential to deter investment. Some developers, even of the very smallest kind, have found negotiations with the Local Planning Authority (LPA) on this matter slow and difficult. The Manor Royal BID acknowledges this is a new area for an already busy, and possibly under-resourced, LPA. The Manor Royal BID is also aware of numerous developments involving the replacement of higher water usage developments (e.g. offices) with more efficient and less water intensive developments (e.g. warehouses) and yet there is no mechanism to retain or share this surplus across the Business District to facilitate new development. The benefit of making water savings is, therefore, lost to Manor Royal and the town. Therefore; <u><i>The Manor Royal BID asks that the LPA provide clear and prompt guidance to developers to avoid unhelpful delays, that water surplus (credits) generated in Manor Royal are retained to support future development in Manor Royal including change of use, that guidance is provided to developers about appropriate off-setting measures they may be able to implement outside the LPA-Led offsetting scheme, consideration is given to the introduction of non-household water saving advice visits as</i></u></p>

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			<p><i>mentioned in the Sussex North Water Neutrality Study: Part C – Mitigation Strategy Final Report (November 2022) and consider how this might be provided to Manor Royal companies and how the water savings this generates can be used to benefit new development. The Manor Royal BID welcomes the opportunity to work with the Council on this.</i></p> <p>Suggested Modifications:</p>
REP/160	Chichester District Council	SDC4	<ul style="list-style-type: none"> supports the approach taken to water neutrality and Policy SDC4 Water Neutrality. This has resulted from joint working by Chichester District Council, Horsham District Council and Crawley Borough Council to produce technical evidence to support the approach. We will welcome continued joint working with CBC on the delivery of the implementation scheme to ensure proposed new development demonstrates water neutrality and meets the requirements of the Habitats Regulations. <p>Suggested Modifications:</p>

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REP/005 (2023)	Thames Water	EP1	<p>We support Policy EP1 part iv) in particular as this is in line with our previous representations.</p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits. We therefore also support Policy EP1 part iii) in particular.</p> <p>In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".</p> <p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p> <p>Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.</p> <p>Suggested Modifications:</p>
REP/055 (2023)	Gatwick Green (Wilky)	EP1	<p>1.0 Introduction</p> <p>1.4 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited., which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council</p>

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			<p>(CBC) area. This representation relates to Policy EP1 Development and Flood Risk in the Draft Crawley Borough Local Plan, 2023 (DCBLP).</p> <p>1.5 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.6 This representation notes that Policy EP1 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2021) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy EP1.</p> <p>2.0 Policy EP1 – intention of policy and compliance</p> <p>Intention of the policy</p> <p>2.1 The purpose of Policy EP1 is to ensure that development avoids areas that are exposed to flood risk and that could increase the risk of flooding elsewhere.</p> <p>2.2 Development within the Borough must be directed to areas of lowest flood risk, where necessary demonstrated by satisfying the sequential and exceptions tests; ensuring the risks of flooding are mitigated, taking account of climate change, including major development in Flood Zone 1; incorporating SuDS into surface water drainage to manage surface water runoff; avoiding impacts on watercourses, and providing certification of drainage works.</p> <p>National planning policy and guidance</p> <p>2.3 The NPPF sets out the objectives of the planning system with regard to meeting the challenges of climate change, flooding and coastal change (para 152).</p> <p>2.4 The NPPF is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on flood risk and coastal change². PPG provides more detail on the policy tests to be applied in determining if development is acceptable in flood risk terms. These cover more specific guidance on taking flood risk into account in local planning policy; assessing and avoiding flood risk; managing and mitigating flood risk; the application of the sequential and exceptions tests; the scope of flood risk assessments, and making development safe from flood risk.</p>

² <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

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			<p>2.5 It is considered that Policy EP1 provides an appropriate level of local policy control, including the key tests to be met in order to avoid or mitigate flood risk consistent with national planning policy and guidance. The policy has been designed to ensure that these matters are addressed in the planning process. In relation to Gatwick Green, this will include flood and land drainage investigations to inform the preparation of a masterplan and a Flood Risk Assessment and drainage strategy to address provisions ii, iii and iv of the policy. These reports and other design material will support an outline planning application in accordance with the requirements in Strategic Policy EC4.</p> <p>3.0 Implications for Gatwick Green</p> <p>3.1 The Gatwick Green allocation falls within Flood Zone 1, which means that the risk of fluvial flooding at the Site is less than a 1 in 1,000 year probability and where employment development is considered to be acceptable. In terms of surface water flooding, most of the Site is at very low risk affecting parcels on the west and north parts of the Site – typically in topographically low areas and along the routes of existing minor ditches and drains. These surface water flooding zones do not represent a constraint to the development of the site for employment land, but will require some mitigation measures.</p> <p>3.2 The overall masterplanning of the Site under Strategic Policy EC4 will need to have regard to the surface water flood zones and any other surface water drainage considerations that arise from more detailed work. These consideration will be taken into account in the design and operation of the proposals for the Site. These will include:</p> <ul style="list-style-type: none"> • Re-profiling and extending the existing ditch system - there will be a requirement to get approvals for any changes to the existing ditches, which will require Land Drainage Consents (LDC). • Based upon micro-drainage quick storage estimates (QSE) and incorporating flood studies report rainfall data, the storage requirement for the whole Site will be around 27,200m³. • Drainage infrastructure, including SuDS, would comprise: <ul style="list-style-type: none"> ○ Tanked permeable pavements. ○ Dry swales. ○ Dry basins. ○ Cellular tanks. ○ Oversized pipework/culverts. <p>3.3 The Appendices to GGL's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to flood risk and drainage are addressed in the 2020 Appendices and subject to Addenda / a new report contained at Appendices A – E of Appendix 3 to GGL's representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes</p>

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			<p>in circumstances. The Addendum to the original Environmental and Utilities Preliminary Assessment Report (Appendix A of Appendix 3 to representation on Strategic Policy EC4), contains an outline assessment of flood risks and a policy-level drainage strategy, building on the work undertaken in the original report.</p> <p>3.4 The Addendum to the Environmental and Utilities Preliminary Assessment Report confirms that the Site can be developed whilst avoiding flood risk on and off-site, and includes recommendations on appropriate avoidance and mitigation measures. These matters will be addressed at the planning application stage and set out in the Flood Risk Assessment, drainage reports and a Design and Access Statement.</p> <p>4.0 Conclusions</p> <p>4.1 GGL acknowledges the need for the Gatwick Green proposals to address flood risk and surface water drainage considerations relating to the Site and referenced in Policy EP1. All feasibility investigations to date indicate that Gatwick Green can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.</p> <p>4.2 It is considered that Policy EP1 provides appropriate and proportionate requirements for addressing flood risk and surface water drainage considerations, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed to incorporate appropriate flood risk mitigation measures and will incorporate innovative drainage solutions appropriate for the Site's location in proximity to an airport.</p> <p>Suggested Modifications:</p>
REP/062	Environment Agency	EP1 EP2	<p>Flood Risk</p> <p>The two Policies, EP1 and EP2, set out the Policy approach to managing flood risk in development planning for Crawley Borough. These Policies are essential, as flood risk is a key issue for Crawley, with parts of the Borough being at significant risk to fluvial flooding from the River Mole catchment, as well as other areas being at risk from surface water flooding.</p> <p>The content and reasoned justification of Policy EP1, Development and Flood Risk, appears sound. As commented above, the SFRA is an important document in setting out the flood risk in the Borough and in outlining recommendations that should be considered in the identification of site allocations and the determining of planning applications. The current SFRA is considered to be fit for purpose, though consideration should be given to updating the SFRA when new or revised information become available.</p> <p>The content of Policy EP1 does reflect the update to the Planning Policy Guidance from August 2022 related to the definition of the functional floodplain, or Flood Zone 3b. The content and reasoned justification for Policy EP2, Flood Risk Guidance for Householder Development and Small Non-Residential Extensions, appear sound. This</p>

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			<p>type of development can have a cumulative impact on flood risk, though in these instances, should be considered through an appropriate assessment. The content of this Policy would allow for this proportionate assessment of flood risk for these types of development, the nature of which is clearly set out within Policy EP2.</p> <p>Suggested Modifications:</p>												
REP/011 (2023)	National Highways	EP4	<p>NH expect development masterplans for allocations in proximity of the SRN to be designed to minimise the exposure to noise from traffic on the SRN, for example a landscape buffer or sensitive screening to shield the environment and dwellings from M23 noise.</p> <p>Suggested Modifications:</p>												
REP/050 (2023)	Homes England	EP4	<p>Policy EP4: Development and Noise Strategic Policy EP4: Development and Noise and Draft Crawley Local Plan Noise Annex seeks to specify through policy and locally specific guidance the noise thresholds and criteria for development in relation to key noise sources within and surrounding the borough. At drafted, the Policy does not appear to be consistent with national policy, the proposed changes to aviation noise thresholds are not adequately justified and could adversely impact on housing delivery meaning that the Plan is not positively prepared.</p> <p>Policy EP4 of the Draft Crawley Local Plan states that <i>‘Noise sensitive uses proposed in areas that are exposed to noise at the ‘Unacceptable Adverse Effect Level’ [UAEL] will not be permitted’</i>.</p> <p>For aviation noise Crawley Borough Council states that the UAEL is 60 dB LAeq,16h during the day and 57 dB LAeq,8h during the night-time. This represents a change in unacceptable noise levels from 66dB LAeq,16h in day and 57dB LAeq,8h at night in the adopted Local Plan.</p> <p>The above UAEL proposed to be included within Policy EP4, and other noise level ranges that the council will seek to use to assess development, are set out in Table 1 of the Noise Annex as summarised in Table 1 below.</p> <p>Table 1 – Aviation Noise Thresholds Proposed by Crawley Borough Council</p> <table border="1"> <thead> <tr> <th>Effect Level</th> <th>Daytime (07:00- 23:00) Threshold dB LAeq,16h</th> <th>Night-time (23:00- 07:00) Threshold dB LAeq,8h</th> </tr> </thead> <tbody> <tr> <td>Lowest Observable Effect Level (LOAEL)</td> <td>51</td> <td>45</td> </tr> <tr> <td>Significant Observed Effect Level (SOEL)</td> <td>54-60</td> <td>48-57</td> </tr> <tr> <td>Unacceptable Adverse Effect Level (UAEL)</td> <td>60</td> <td>57</td> </tr> </tbody> </table> <p>The Local Plan Noise Annexe is clear that the sound levels proposed to be used by Crawley Borough Council to assess the SOAEL and the UAEL are ‘locally specific’ with reference made in paragraph 4.1.3 of the Noise Annexe</p>	Effect Level	Daytime (07:00- 23:00) Threshold dB LAeq,16h	Night-time (23:00- 07:00) Threshold dB LAeq,8h	Lowest Observable Effect Level (LOAEL)	51	45	Significant Observed Effect Level (SOEL)	54-60	48-57	Unacceptable Adverse Effect Level (UAEL)	60	57
Effect Level	Daytime (07:00- 23:00) Threshold dB LAeq,16h	Night-time (23:00- 07:00) Threshold dB LAeq,8h													
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			<p>to Topic Paper 7: Development and Noise Technical Annex 'Section 6' which sets out a range of evidence to justify draft Policy EP4.</p> <p>Given this 'locally specific approach', the thresholds proposed by Crawley are significantly lower than those typically used for aviation noise. The typical noise thresholds and recent evidence to support these values are summarised in Table 2 below and the associated footnotes.</p> <p>Table 2 – Mainstream Aviation Noise Thresholds</p> <table border="1"> <thead> <tr> <th>Effect Level</th> <th>Daytime (07:00- 23:00) Threshold dB LAeq,16h</th> <th>Night-time (23:00- 07:00) Threshold dB LAeq,8h</th> </tr> </thead> <tbody> <tr> <td>LOAEL</td> <td>51¹</td> <td>45</td> </tr> <tr> <td>SOAEL</td> <td>63²³⁴⁵</td> <td>55</td> </tr> <tr> <td>UAEL</td> <td>69⁶</td> <td>61</td> </tr> </tbody> </table> <p>While the potential impact of aviation noise is accepted, the moving away from national guidance based on “locally adopted evidence based levels for specific circumstances” is not justified.</p> <p>Within Topic Paper 7, the Council references a single appeal decision to justify an all-out restriction of development within the 60 LAeq,16h contour. The extract provided as justification for the policy change is clear that the noise impact was not unacceptable in its own right, but one of a number of reasons for refusing the application and therefore there were other material considerations that resulted in the dismissal of the appeal in that case. As such, reliance on this appeal decision is not sufficient to justify the proposed UAEL noise threshold within Policy EP4, when considered against the typical thresholds that have been tested widely as set out in Table 2 and the associated footnotes.</p> <p>In addition, whilst the Gatwick Noise Action Plan commits to offering acoustic insulation for existing properties within the 60 dB LAeq,16h threshold, this is not appropriate justification for the same threshold to be applied to new development. The ability to retrofit noise insulation into existing building stock is more limited than that possible for new development, where a range of suitable mitigation can be built into the proposals via an iterative and holistic process of good acoustic design dependent on the nature and noise exposure of homes. As such, new development has the ability to achieve suitable noise levels in homes within higher noise contours.</p> <p>Overall, while there is a discussion regarding government policy and an attempt within the Noise Annexe to justify the proposed changes, the section dismisses rather than takes an objective view of the available evidence (e.g. dismissing relevant appeal decisions) claiming there are greater benefits of the proposed policy approach compared to housing decisions, with paragraph 6.6 claiming: “<i>with new housing development there is no absolute</i></p>	Effect Level	Daytime (07:00- 23:00) Threshold dB LAeq,16h	Night-time (23:00- 07:00) Threshold dB LAeq,8h	LOAEL	51 ¹	45	SOAEL	63 ²³⁴⁵	55	UAEL	69 ⁶	61
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			<p><i>requirement to build in such high noise locations which have a detrimental and negative effect on the health and welfare of future residents and ultimately on the economy of the UK”.</i></p> <p>Given the significant shortfall in housing supply over the Plan period, the above statement is not justified, especially when considering that the UAEL has already been widely accepted both within the industry and in recent decisions at a higher level to that proposed. Therefore, the locally specific approach set out in EP4 is not adequately justified.</p> <p>The consequence of specifying a lower noise threshold for residential development than is implied by national policy/guidance is that this could prejudice the ability for the council to approve homes that are otherwise acceptable, where there is already a significant shortfall in meeting housing needs within the borough. For this reason, the proposed noise threshold within policy is not positively prepared or effective.</p> <p>Notwithstanding this, Homes England consider there may be merit in updating the threshold from that set out in the adopted Local Plan. This should not be to the extent suggested in draft Policy EP4 but rather consistent with typical noise thresholds applied as per Table 2 above. In particular, the policy should identify the SOEAL, rather than UAEL, as not be less than 63dB LAeq,16h. Any lower or more restrictive threshold should only be proposed if a stronger justification can be provided.</p> <p>Homes England reserves the right to comment and respond to any additional evidence provided to justify the lower noise thresholds, if maintained.</p> <p>Finally, the noise guidance supporting the Draft Crawley Local Plan should also be consistent with the emerging policy in terms of which forms of development which are assessed against it. Policy EP4(A) specifically relates to ‘noise sensitive development’ which is defined in the Draft Crawley Local Plan Glossary. However, Topic Paper 7, at paragraph 5.11 states that <i>“the only option with residential developments is to restrict the whole development to the 60dB contour so that residents are not exposed to excessive levels of noise whilst carrying out external activities in their gardens, in the street, at the local shops or waiting for the bus...</i>” It would be inappropriate for the restriction in EP4 to apply to non-noise sensitive development, as defined in the Local Plan Glossary and against national guidance which instead focuses on residential dwellings and gardens only. The proposed restriction to the “whole development” within the Topic Paper 7 should therefore be removed to avoid ambiguity and ensure consistency across the evidence base.</p> <p>Suggested Modifications:</p>
REP/056 (2023)	Gatwick Airport Limited	EP4	<p>EP4: Development and Noise (and Local Plan Noise Annex) 54. The policy is largely unchanged from the 2020 Regulation 19 DCLP which we broadly supported. We considered that the policy is correct in its approach of:</p> <p>a. Avoiding noise sensitive development which would be exposed to “unacceptable” levels of noise</p>

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			<p>b. Requiring mitigation measures where noise sensitive development would be exposed to noise levels above the Lowest Observed Adverse Effect Level.</p> <p>55. We are pleased that the minor amendments we suggested to the policy at that time have been adopted.</p> <p>56. However, in our 2021 Regulation 19 DCLP response, we objected on to the 'unacceptable level', in relation to aviation transport sources defined in part A of the policy specifically for New Sensitive Development as 60dB LAeq (and reflected in Table 1 of the Noise Annex), is not appropriate for reasons stated in paras 9.4 to 9.8 of our 2020 response.</p> <p>57. Topic Paper 7 offers a justification of the LAeq 60dB level with reference to a single appeal decision for residential development, located very close to the extended centre line of Manchester Airport's second runway. Given, however, the variety of developments that may be proposed in the Crawley area and their relative position to the runway infrastructure at Gatwick GAL does not consider that it should automatically follow that the LAeq 60dB level be adopted as 'unacceptable' for new noise sensitive development across the borough of Crawley.</p> <p>58. In the 2015 Local Plan the unacceptable level for new housing was set at 66dB LAeq, reflecting planning guidance at that time and decisions on planning applications such as Forge Wood in 2011. With more recent studies showing sensitivity to noise having increased, we consider 63Db LAeq should be taken as the Significant Adverse Effect Level and this should be reflected in Table 1 of the Noise Annex instead of Leq 60dB.</p> <p>59. We support the changes made to correct the Lowest Observed Adverse Effect Level (LOAEL) for aircraft noise is 51dB LAeq, 16 hour and 45dBLAeq, 8 hour night1 and the requirement in Policy EP4 to incorporate noise mitigation into new noise sensitive development in areas where noise levels are above this. That mitigation should be developed in line with the Pro-PG Planning and Noise; New Residential Development, as referred to in the Noise Annex and at the developer's expense.</p> <p>60. We support the clarification made in Topic Paper 7, paragraphs 6.5 and 6.6 that, with regards to acceptable levels of noise when planning for new housing, this is a very different situation to considering the noise levels when planning airport expansion.</p> <p>61. We support the reference in paragraph 4.1.6 of the Noise Annex to possible updates to the Gatwick Airport noise contours shown in Figure 1 of the Annex. Should our Northern Runway Project be consented then appropriate noise contours would be included.</p> <p>Suggested Modifications:</p>
REP/060 (2023)	Savills on behalf on	EP4 and Noise Annex	<p>Objection</p> <p>Following a thorough review of Policy EP4 and supporting guidance, Bellway Homes are of the view that proposed Policy EP4 and the supporting Noise Annex in relation to the proposed approach for protecting new residential</p>

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	Bellway Homes		<p>development from noise would not be effective in doing so. This is explained below with suggested amendments to the policy wording.</p> <p>The shortcoming in Policy EP4, and the supporting noise annex, is that the stated noise criteria for 'Unacceptable Adverse Effects' are external noise levels and therefore do not account for any mitigation that could be adopted through the design that would reduce the external noise levels to acceptable levels in habitable areas.</p> <p>For example, the noise annex states that 'Unacceptable Adverse Effects' will occur where external aircraft noise levels are above 60 LAeq,16hour, or road traffic levels are above 66 dB LAeq,16. This suggests that any development on sites subject to these noise levels will be likely refused planning consent on the basis of principle. This ignores the possibility of reducing the noise to acceptable levels in the habitable areas via good acoustic design (e.g. acoustically upgraded facades, internal layouts, screening, etc), which are possible for many sites. As a result, in a borough such as Crawley, with Gatwick Airport and strategic roads, such as the M23, EP4 is a restrictive policy that would limit much needed housing coming forward in sustainable locations near employment and transport hubs.</p> <p>Rather than setting strict external noise limits, each proposed development should be assessed on its own merits and therefore it is not appropriate prevent a site coming forward for development without considering the achievable benefit of good acoustic design or mitigation that could be incorporated in the proposals. This would be in line with all relevant noise planning guidance, in particular; the central government guidance on noise relating to planning at https://www.gov.uk/guidance/noise--2 , which states:</p> <p><i>Can planning policies include noise standards?</i> <i>Plans may include specific standards to apply to various forms of proposed development and locations in their area. Care should be taken, however, to avoid these being applied as rigid thresholds, as specific circumstances may justify some variation being allowed.</i> <i>Paragraph: 007 Reference ID: 30-007-20190722</i> <i>Revision date: 22 07 2019</i></p> <p>It is clear from the central government guidance above that the proposed 'Unacceptable Adverse Effect' criteria should not be applied in their current form as rigid thresholds that do not allow for mitigation and benefits of good acoustic design.</p> <p>Suggested Modifications: Therefore, it is recommended that the following modifications to Policy EP4 (<u>red underlined</u>) which would bring the policy in line with central government guidance and other relevant noise-related planning guidance (e.g. ProPG – Planning & Noise, New Residential Developments):</p>

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			<p>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.</p> <p><i>A. Noise Sensitive Development</i> Residential and other noise sensitive development will be permitted where it can be demonstrated that users of the development will not be exposed to unacceptable noise disturbance from existing or future uses. Noise sensitive uses proposed in areas that are exposed to noise above the Lowest Observed Adverse Effect Level (LOAEL) or at <i>or above</i> 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 LAeq,16hr (57dB LAeq,8hr at night). For aviation transport sources the Unacceptable Adverse Effect is considered to occur where noise exposure is above 60dB LAeq,16hr. (57dB LAeq,8hr at night).</p> <p><i>D. Mitigating Noise Impact</i> Where proposals are identified as being in the Lowest Observed Adverse Effect Level (LOAEL) or at <i>or above</i> 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.</p> <p>The noise annex should also be updated in line with the above modifications to prevent the proposed 'Unacceptable Adverse Effect' criteria being applied in their current form as rigid thresholds. For brevity, the suggested modifications are not shown here however we believe they would be straightforward to implement. Updating the above policy wording would result in a more positively prepared, justified, effective and consistent with national policy in line with the Paragraph 35 of the NPPF relating to Tests of Soundness. This would help enable the Borough deliver new homes and meet housing need as described elsewhere in the emerging Local Plan Review.</p>
REP/063 (2023)	Persimmon Homes	EP4	Policy EP4 (A) Noise Sensitive Development imposes a noise level restriction of 60 dB LAeq, 16 hr that is not justified or supported by National Planning guidance. This would constrain available land in the Borough at Forge Wood that could be more effectively used to meet local requirements for residential and non-residential use.

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			<p>Suggested Modifications: The Policy EP4 (A) limit should be raised to 66 dB LAeq, 16 hour and the night-time level raised to 63 dB LAeq, 8 hour to accord with the current level set by Policy ENV11 of the current adopted Local Plan.</p>
REP/152	Save West of Ifield Campaign	EP4 16.31	<p>The Local Plan recognises the potential impact of development and noise on health but fails to identify how this will be monitored and controlled (Page 232 Para. 16.31). This will be a major issue for Crawley residents in Ifield if the West of Ifield development goes ahead because construction traffic will have to use the existing road network to access the site with a consequent impact on local residents' health and well-being.</p> <p>Suggested Modifications:</p>
REP/113 (2023)	Natural England	EP5	<p>Policy EP5: Air Quality We support this policy's requirements to protect the wider environment from significant adverse effects of atmospheric pollution as well as the specific requirements for developments to help improve air quality and enhance the environment. We also support requirements focused on reducing overall background pollution levels. We note that these requirements are in line with the aims of the NPPF (paragraphs 174. 186.) and goal 2 of the EIP.</p> <p>Suggested Modifications:</p>
REP/152	Save West of Ifield Campaign	EP5 16.44	<p>The Local Plan (Page 236 16:44) makes clear CBC's responsibility for air quality and its potential impact on health but is short on the detail on how this is to be achieved and monitored. Save West of field believes that a more robust approach is required given the proximity to Gatwick Airport.</p> <p>Suggested Modifications:</p>
REP/011 (2023)	National Highways	EP6	<p>The policy should include a requirement for the assessment of the brightness and effect on public safety of drivers on the SRN in respect of visible external lighting arising from a development in close proximity to the SRN.</p> <p>Suggested Modifications:</p>

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REP/152	Save West of Ifield Campaign	17.1	<p>In order to provide additional facilities and services for new development that is adjacent to Crawley's boundaries it will be necessary to require additional provision within Crawley's boundaries. This will be needed to improve existing capacity, to extend provision of the Cycleway network and to upgrade facilities including junctions, accessibility and usability.</p> <p>This requirement is not covered within the draft Local Plan. It will be difficult to obtain these items without inclusion within the Local Plan resulting in further development on Crawley's boundaries not providing these facilities to the detriment of the existing population.</p> <p>Suggested Modifications:</p>
REP/166 (<i>check 2020 – REP/059 and 2021 reps</i>)	Surrey County Council	17.2 17.4 17.5 ST1	<p>Highways SCC welcomes the assertion that existing transport infrastructure should be enhanced with active travel and public transport facilities to encourage use of non car modes of transport. It is mentioned in paragraph 17.2 that the Borough of Crawley would work closely with West Sussex County Council and National Highways. Where there are impacts across the county boundary this could include a commitment to work with Surrey Highways.</p> <p>It is noted in the key issues in paragraph 17.4 that Crawley's population is still growing, two new neighbourhoods are being added to the town and additional housing sites are proposed along with growth in employment and anticipated growth at Gatwick Airport. This growth should be supported with active travel and public transport modes with no direct access from the developments to the A23 and A217 heading north to Surrey.</p> <p>It is acknowledged in paragraph 17.5 that the location of development is crucial and that developments in sustainable locations would be able to meet travelling needs by active and travel modes suggesting that such development would be preferable. This is welcome as this would reduce reliance on motorised forms of transport and therefore traffic heading north into Surrey.</p> <p>It is welcome that Policy ST1 would prioritise active and public transport modes of travel in new development and that walking and cycling infrastructure forming part of the development is in place and usable at the point of first occupation. This would encourage the use of non car modes of transport which could mitigate the impact of increased motor traffic heading north in Surrey. In developments that generate significant amounts of travel it would be necessary for developers to contribute to active and public transport infrastructure.</p> <p>Suggested Modifications:</p>
REP/011 (2023)	National Highways	ST1	<p>The policy should require developments (certainly the key housing sites) to include a vision setting out the outcome communities want to achieve and the sustainable transport solutions to deliver the outcome ('vision and validate'). This is needed to comply with Circular 1/2022 (para.15).</p> <p>The policy needs to require masterplans for key housing sites to help deliver the vision through layout and design (eg walkable neighbourhoods) to demonstrate how the need to travel, especially by car, will be reduced. The</p>

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			<p>masterplan work should ensure that developments optimise the potential of sites to support local facilities and sustainable transport networks, there by reducing the reliance on the SRN for local journeys. As well as highway safety, other considerations should include reliability and operational efficiency, especially of the SRN.</p> <p>Suggested Modifications:</p>
REP/055 (2023)	Gatwick Green Ltd (The Wilky Group)	ST1	<p>1.0 Introduction</p> <p>Background</p> <p>1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to Strategic Policy ST1 Development and Requirements for Sustainable Transport in the Draft Crawley Borough Local Plan, 2023 (DCBLP).</p> <p>1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green (the Site), most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>Scope of representation</p> <p>1.3 This representation sets out the evidence in support of the Crawley Transport Strategy and Strategic Policy ST1 with reference to:</p> <ul style="list-style-type: none"> • National and regional planning and transport policy. • Local transport strategies - Highway and Planning Authorities. • How Strategic Policy ST1 supports sustainable development within Crawley. • How Gatwick Green is aligned with the principles behind the Council's strategy and policies on transport, including Strategic Policy ST1. <p>Direction of National / Regional Transport Policy</p> <p>2.1 The National Planning Policy Framework, (NPPF, 2021) confirms the purpose of the planning system is to contribute to the achievement of sustainable development.</p> <p>2.2 Paragraph 104 of Section 9 of the NPPF sets out that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:</p> <ol style="list-style-type: none"> 1. The potential impacts of development on transport networks can be addressed.

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			<ol style="list-style-type: none"> 2. Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated. 3. Opportunities to promote walking, cycling and public transport use are identified and pursued. 4. The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains. 5. Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places. <p>2.3 Paragraph 105 confirms this approach, stating that: <i>“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”</i></p> <p>2.4 The report titled <i>Gear Change – A bold vision for walking and cycling (DfT – July 2020)</i>, sets out the Government’s ambition for a future where half of all journeys in towns and cities are cycled or walked. With 58% of car journeys in 2018 being under 5 miles, and in urban areas, more than 40% of journeys being under 2 miles in 2017–18, many people would be able to walk or cycle to their destination.</p> <p>2.5 The report provides nine key pledges to increase the level of walking and cycling, including:</p> <ul style="list-style-type: none"> • The delivery of thousands of miles of safe, continuous, direct routes for cycling in towns and cities, physically separated from pedestrians and volume motor traffic, serving the places that people want to go. • Creating cycle, bus and walking corridors, closing a limited number of main roads to through traffic except for buses and access. • Reducing rat-runs and delivering “school streets” which protect children. • Improve the National Cycle Network, with higher design standards and creating more “Mini-Hollands”. <p>2.6 Transport for South East, (TfSE) comment in the introduction to their Transport Strategy published in 2020 that such strategies were typically devised on a “predict and provide” basis, with planners making forecasts about future transport demand based on past trends, with investment focused on expanding capacity on road and rail networks.</p>

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			<p>2.7 The TfSE approach (Transport Strategy, June 2020) going forward is to decide on the future people want for the region and plan a transport system that helps make it happen, putting people and places first, rather than vehicles. The vision stated in the TfSE strategy is that:</p> <ul style="list-style-type: none"> • <i>By 2050, the South East of England will be a leading global region for net-zero carbon, sustainable economic growth where integrated transport, digital and energy networks have delivered a step change in connectivity and environmental quality; and</i> • <i>A high-quality, reliable, safe and accessible transport network will offer seamless door-to-door journeys enabling our businesses to compete and trade more effectively in the global marketplace and giving our residents and visitors the highest quality of life.</i> <p>3.0 Crawley’s Transport Strategy</p> <p>3.1 The Vision that Crawley Borough Council is proposing for transport and travel was clearly stated in the publication of a policy document in March 2020 entitled ‘New Directions for Crawley, Transport and access for the 21st century’. The introductory section states that “<i>Crawley Borough Council aims to join those in the forefront of new thinking on transport and access to find sustainable solutions for Crawley</i>”.</p> <p>3.2 The means by which CBC will deliver its vision is set out on page 11 of New Directions, (March 2020), as follows: <i>“In the light of the climate emergency, health needs, developing technology and new policies and approaches for Crawley and the south-east, as well as studies and experience across Europe, Crawley Borough Council aims to work in partnership with WSCC, transport, business and community bodies, to meet the following aims:</i></p> <ol style="list-style-type: none"> 1. <i>Improved sustainable travel infrastructure</i> – <i>prioritise walking and cycling network improvements and facilities, improving public transport access and services.</i> 2. <i>Smarter highway network management</i> – <i>managing demand, directions, speeds and inefficient road space allocation to address congestion and improve access and health of neighbourhoods and business districts.</i> 3. <i>Integrated transport and land use planning</i> – <i>ensure housing and business development centres on public transport links and walking and cycling networks as ‘Transit Oriented Development’ for improved access.</i> 4. <i>Effective travel planning</i> – <i>working with business and other organisations to improve commuter, visitor, shopping and leisure choices and reduce single-occupancy car use.</i> 5. <i>Shared mobility</i> – <i>develop facilities such as car clubs and shared bikes, with electric vehicle charging to broaden choices beyond conventional private car use”.</i>

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			<p>3.3 It is recognised that the strategy and policies enshrined in the Draft Crawley Borough Local Plan (DCBLP) attempt to balance the aspirations for growth and new development with the need to minimise carbon emissions and the impact of travel on climate change and air quality. The Plan states at paragraph 2.54: <i>“The Crawley Transport Strategy ‘New Directions’ identifies 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. It sets out a vision for decarbonising transport whilst developing access to work, education, shopping and leisure that is easier, more affordable and healthier”</i></p> <p>3.4 Crawley has a record of delivering genuine improvements in public transport through Fastway, which has helped achieve a shift from car to bus travel. It is also clear that recent sustainable transport measures proposed and under development as part of the Coast to Capital Growth Fund are an extension of a local commitment to innovation in transport. This includes significant investment in hydrogen powered buses with zero emissions. The DCBLP (para 2.39 to 2.41) sets out that:</p> <ul style="list-style-type: none"> • Crawley has excellent communications, lying adjacent to the M23, close to the M25 and is on the mainline railway linking London to Brighton and the south coast. Gatwick Airport is located within the borough. • The town itself is served by a rapid guided bus service: Fastway, which provides attractive and effective public transport services, which are essential to facilitate and encourage a shift to sustainable modes of transport. • There is 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 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, modal shift 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. • All new developments should 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, to encourage a viable and attractive alternative to car use, both for commuters, residents and visitors.

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			<p>3.5 Paragraph 2.56 of the DCBLP refers to the Government's Cycle and Walking Investment Strategy, published in 2017, contains challenging targets for travel by active modes by 2025. This forms a basis for the adopted Crawley Local Cycle and Walking Infrastructure Plan (LCWIP), which informs an approach to the sustainable transport in Strategic Policy ST1.</p> <p>4.0 Crawley's policy response: Strategic Policy ST1</p> <p>4.1 Strategic Policy ST1 sets out the requirements for development in relation to sustainable transport. The key aims of the policy are:</p> <ul style="list-style-type: none"> • That development should be located and designed to prioritise and encourage travel via the walking and cycling network and public transport routes, while reducing dependency on travel by private motor vehicle. • That development should be phased so that walking and cycling infrastructure which forms part of the development is delivered at the earliest opportunity. • Development should contribute to improved sustainable transport infrastructure off-site, including, where appropriate, bus priority measures, enhanced passenger information, and routes identified in the Council's adopted Local Cycling and Walking Infrastructure Plan. • Development should provide an appropriate amount and type of parking in accordance with Policy. • Developments should not cause an unacceptable impact in terms of increased traffic congestion or highway safety. • Development 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. <p>4.2 GGL considers that Strategic Policy ST1 is entirely consistent with and advances the aims and principles embodied in current and emerging national, and regional transport strategies and plans. The Crawley Transport Strategy (defined in Para 2.54 of the DCBLP) is also framed within the context of the West Sussex Transport Plan (2022) which states its objectives as:</p> <ul style="list-style-type: none"> • Sustain economic prosperity. • Accommodate demographic change and planned development. • Avoid and minimise impacts on public health. • Enable healthy lifestyles and ensure access to services. • Achieve net zero by 2050. • Avoid and minimise impacts on the environment and enhance biodiversity. • Adapt to climate change. • Reduce the need to travel by car; improve road efficiency, rail services, bus networks; extend and improve active travel facilities,

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			<p>4.3 GGL therefore support the Council's strategy and policy response under Strategic Policy ST1 and understands that the implementation of schemes to deliver the policy are underway in many parts of the borough. The need to afford priority to cyclists, pedestrians and public transport users is enshrined in Strategic Policy ST1 and is in line with central and regional policy to improve connectivity for those travelling within and to destinations outside the Borough. GGL support this approach and briefly describe in the following section the way in which the proposed development at Gatwick Green will meet the aspirations for Sustainable Transport defined in Strategic Policy ST1.</p> <p>4.4 A more detailed description of the transport measures is contained in Appendix 2 of GGL's representations on Strategic Policy EC4 submitted in response to consultation on the DCBLP.</p> <p>5.0 Approach for Gatwick Green</p> <p>5.1 GGL has adopted the West Sussex Transport Plan (WSTP, adopted 2022) objectives along with the policy commitments contained within Strategic Policy ST1 of the DCBLP, forming principles to guide its approach to sustainable transport as follows:</p> <ul style="list-style-type: none"> • Provide employment opportunities that widen and deepen the skill base of residents in Crawley and its immediate neighbours. This will reduce levels of "out-commuting" and therefore the length of trips. Shorter journeys are made more easily by active modes, walking and cycling and potentially, personal electric transport. • Link new and existing residential development with employment opportunities at Gatwick Green through supporting infrastructure and transport services that cater for carbon neutral modes of travel, potentially reducing reliance on the private car and in line with the concept of Mobility as a Service, (MAAS). • Ensure a consistent approach to the delivery of new transport services and infrastructure across borough/county boundaries and to work in partnership with relevant agencies such as the Coast to Capital LEP and Transport for the South-East (TfSE). • Achieve a high level of integration between carbon-neutral modes by providing strategically located and high quality interchange facilities (the concept of super-hubs is already established in Crawley). • Establish a multi-modal, comprehensive and flexible Sustainable Transport Strategy which is phased in line with the development. • Following completion of the Crawley Transport Model, consideration will be given to modest improvements to road junctions in line with the CBC policy of attracting a greater mode share for cyclists, pedestrians and bus users. <p>5.2 The overarching transport strategy for Gatwick Green is therefore to ensure people can reach the new facilities by appropriate transport modes, promoting sustainable travel as part of a lifestyle choice allowing employees and visitors to access the site by foot, cycle and public transport. The aim is to reduce the use of private cars</p>

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			<p>for shorter journeys from the neighbouring residential areas and those further afield. At the heart of the development philosophy will be a transport strategy which recognises the need to address climate change and the pledge by Crawley Borough Council to reduce carbon emissions generated by CBC activities by at least 45% by 2030³, in line with the Inter-Governmental Panel on Climate Change.</p> <p>5.3 The following sets out how development at Gatwick Green is consistent with and meets the requirements of Strategic Policy ST1:</p> <p>Public Transport</p> <ul style="list-style-type: none"> • The ability to introduce several accesses onto Balcombe Road provides an opportunity to divert existing fastway/bus services to penetrate the site. This will incidentally benefit existing residents and businesses and other new development along the Balcombe Road Corridor. • Public transport provision for the site will, in collaboration with CBC and Metrobus, be integrated into the Fastway Development Programme. • Mobility transport hubs will be introduced within the site. These are already proposed for Manor Royal and will allow for seamless interchange between ride sharing, public transport and non-motorised modes of travel in line with existing initiatives identified within the Crawley Growth Programme and Crawley New Directions. <p>Walking and cycling</p> <ul style="list-style-type: none"> • Alongside the public transport provision, the access strategy and internal layout will prioritise high quality, safe walking and cycling routes in line with latest guidance. • In conjunction with CBC, improvements will be made to existing pedestrian and cycle routes, plugging gaps and connecting to the enhanced network specified in the adopted Crawley Local Cycling and Walking Infrastructure Plan (LCWIP). <p>Parking</p> <ul style="list-style-type: none"> • The development will deliver an appropriate amount of parking for both cars, light vehicles and heavy goods vehicles in line with parking standards and typical demand, to ensure that there is no adverse impact on the local highway network or neighbouring areas. • Parking infrastructure will meet the standards and requirement at the time of any application(s) and would include meeting anticipated demand for Electric Vehicle (EV) Charging Infrastructure. The scale and type of parking will meet Local Plan Policy and West Sussex County Council's 2019 Guidance on Parking in New

³ Crawley Borough Council Climate and Ecological Emergency Action Plan – September 2021 Core Principles for Action Introduction -The Global Climate Change and Ecological Emergency, Crawley Borough Council, November 2021

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			<p>Developments, along with emerging EV Strategy and any appropriate guidance in respect to the development of Hydrogen recharging network.</p> <p>6.0 Conclusions</p> <p>6.1 The Strategic Policy ST1 is consistent with the NPPF and associated policy and guidance and as such is sound against the tests set out in paragraph 35 of the NPPF. It also represents a positive response to the Council's transport strategy ('New Directions') to develop more attractive transport infrastructure that serves everyone alongside decarbonising transport across the town.</p> <p>6.2 The Gatwick Green development would satisfy Strategic Policy ST1 through explicitly meeting the following requirements:</p> <ol style="list-style-type: none"> i. The development is designed to prioritise the needs of pedestrians, cyclists and public transport users over ease of access by the motorist. ii. Appropriate amount and type of parking is provided in accordance with Strategic Policy ST1 and Policy ST2. iii. The development will be phased to ensure infrastructure for pedestrians and cyclists is available from first occupation. iv. Contributions will be made to bus priority and LCWIP schemes, where appropriate. <p>6.3 A Transport Assessment will be produced for Gatwick Green which includes a Mobility Strategy or Travel Plan to meet the requirements of Strategic Policy ST1. Crawley Borough Council is at the forefront of the emerging national policy of Decide and Validate, recently adopted by Transport for South-East (TfSE). This will assist in meeting its aspiration to reduce carbon emissions and is consistent with West Sussex County Council objectives, defined in the adopted WSTP.</p> <p>Suggested Modifications:</p>
REP/056 (2023)	Gatwick Airport Limited	ST1	<p>ST1: Development and the Requirements for Sustainable Transport 64. We supported this policy in the 2020 Regulation 19 DCLP but suggested a minor revision. We note that the policy has not been changed but we have no objections to the policy as worded.</p> <p>Suggested Modifications:</p>
REP/152	Save West of Ifield Campaign	ST1	<p>Strategic Policy ST1 refers to the necessity for 'Designing developments to prioritise the needs of pedestrians, cyclists and users of public transport over ease of access by the motorist'.</p> <p>Paragraph 17.1 refers to 'the provision of additional facilities and services'.</p> <p>But in order to meet these policy objectives it would be necessary to significantly improve elements of the existing transport infrastructure in Crawley in order to enable this objective.</p>

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			<p>This will include all active travel corridors to/from the site to the relevant trip attractors in Crawley like Gatwick, Manor Royal, Town Centre etc.</p> <p>Suggested Modifications:</p>
REP/151	Manor Royal BID	ST1	<p>Sustainable Transport (Policy ST1): When advising developers on Travel Plans to minimise single occupancy car journeys into Manor Royal, there is often little regard for how developers might engage with the Manor Royal BID to make use of free to access initiatives provided to Manor Royal companies via the BID to encourage, support and promote modal shift. There is also little regard for how aspirations to promote Electric Vehicle (EV) charging (para 17.14) might also be extended to encompass investment in the public highway where, inevitably, Manor Royal workers park. Therefore; <i>The Manor Royal BID asks for consideration to be given by planning officers to advise developers on the role of the BID in supporting modal shift and to liaise with the BID to help inform their travel plans in support of their tenants. Further, the Council are asked to consider – in liaison with West Sussex County Council Highways – how better use of the public highway in Manor Royal might be used to support EV charging.</i></p> <p>Suggested Modifications:</p>
REP/050 (2023)	Homes England	ST3	<p>Policy ST3: Improving Rail Stations</p> <p>Considering the identified potential for the possible westward expansion of Crawley, Homes England is pleased to see the continued inclusion of the amendments recommended at Regulation 18 stage. These clearly identify the potential to strengthen the role of Ifield, a suburban rail station, to meet the needs of any increases in rail patronage.</p> <p>Suggested Modifications:</p>
REP/056 (2023)	Gatwick Airport Limited	ST3	<p>ST3: Improving Rail Stations</p> <p>65. We objected to the policy in the 2020 Regulation 19 DCLP. We note that the policy has been amended broadly in line with suggested changes we proposed. We therefore no longer object to this policy as amended.</p> <p>Suggested Modifications:</p>
REP/011 (2023)	National Highways	ST4	<p>Based on the high-level details provided for the Crawley Western Multi-Modal Transport Link, NH are satisfied that there will not be an unacceptable impact on the SRN. However, as further details of the alignment are available NH will need to review the impacts.</p>

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			<p>Summary</p> <p>Thank you for engaging with NH on the Regulation 19 Local Plan. We recognise that Crawley Borough Council has engaged with NH constructively, actively and on an ongoing basis on strategic transport matters relating to the SRN during the preparation of the Local Plan.</p> <p>There are a few significant soundness issues relating to the Local Plan and potential impacts on the safety, reliability and operational efficiency of the SRN that need addressing. In particular, the misalignment between the forecast year in the CTS (2035) and the time horizon of the Plan (2040). This misalignment means it is not possible to make a reasonable judgement on whether the safety, reliability and operational efficiency of the SRN would be unacceptably impacted by the spatial strategy at the end of the plan period. NH believe this can be resolved, ideally prior to submission, through an Addendum to the CTS so that the forecast year aligns with the time horizon of the Local Plan.</p> <p>Consistency with national policy must also include consistency with Circular 1/2022, which is the national policy for the SRN. The Plan needs to emphasise the importance of visions for key housing sites setting outcomes communities want to achieve and sustainable transport solutions to deliver those outcomes ('vision and validate'). Masterplans can play an effective role in achieving this through layout and design of development sites which can help reduce the need to travel and, as a consequence, reduce the reliance on the SRN for local journeys. NH is willing to assist in this process, including the drafting of a checklist to demonstrate where and how the Local Plan responds positively to the expectations of Circular 1/2022.</p> <p>NH is happy to meet up with officers at Crawley Borough Council to discuss these matters and find a way forward to address the concerns raised that relate to the SRN and the delivery of the requirements of Circular 1/2022. If you have any questions with regards to the comments made in this response, please do not hesitate to contact me via PlanningSE@nationalhighways.co.uk.</p> <p>Suggested Modifications:</p>
REP/032 (2023)	West Sussex County Council	Gatwick Airport Runway Project Transport Modelling ST4	<p><u>Gatwick Northern Runway Project</u></p> <p>Gatwick Airport Ltd are developing plans to expand the airport by bringing the northern runway into regular use as part of their Northern Runway Project. There is potential for impacts of the project and the Crawley Local Plan to be cumulative and an application for a Development Consent Order for the scheme is imminent, so this could be a topic of discussion at a future examination in public. In order to provide evidence to inform future discussions on cumulative impacts of these schemes on the transport network, the County Council recommends that a sensitivity test is undertaken and included in the evidence base. This would also help to identify projects that could help to mitigate these cumulative impacts such as the Crawley Western Link Road / Multi-modal Transport Link between the A264 and A23.</p>

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			Suggested Modifications:
REP/032 (2023)	West Sussex County Council	GAT2 ST4	<p>WSSC objected to the previous Regulation 19 consultation (in 2021) due to a conflict between safeguarded land for the potential future additional wide space runway at Gatwick airport and the safeguarded search corridor for a Crawley Western Link Road. Further technical work has now taken place and a solution has been found, WSSC would like to withdraw this objection.</p> <p>Suggested Modifications:</p>
REP/033 (2023)	Horsham District Council	ST4	<p>Strategic Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Multi-Modal Transport Link We support this policy subject to the following comment: The corridor for new multi-modal corridor will need to be agreed jointly with HDC as most of any route would be within the administrative area of Horsham. Any area of safeguarding should not prejudice this potential. It is noted that this is recognised in the supporting text. We are also pleased to have been given opportunity to work collaboratively with CBC on consultancy-led work to better understand options for a safeguarded corridor in light of constraints and potential impacts. We confirm this work will inform our own consideration of safeguarding a corridor.</p> <p>Suggested Modifications:</p>
REP/035 (2023)	Vail Williams on behalf of Ardmere Ltd	ST4	<p>Policy ST4: Area of Search for Crawley Western Multi-Modal Transport Link (CWMMTL) Policy ST4 identifies an area of search for a new Crawley Relief Road, renamed in the May 2023 Regulation 19 draft as a Crawley Western Multi-Modal Transport Link. This CWMMTL is proposed to run through the Jersey Farm site and aims to link the A264 to the Southwest and the A23 to the East. The policy aims to link with Horsham District Councils' emerging Regulation 19 District Plan which has now been delayed and would link to a potential allocation at land west of Crawley at Ifield promoted by Homes England. Our project team have ensured regular and constant dialogue with Homes England to consider updates to both project, potential layouts, and version update of our Masterplan, and to discuss issues and options behind consistency of design and trajectory of any road alignment.</p> <p>The May 2023 Sustainability Appraisal under Objective 8 relates to Infrastructure and states that the Local Plan must “ensure the provision of sufficient infrastructure to meet the requirements of the borough”. It also states that “The rate of development, particularly residential and also airport growth, requires careful management to ensure that it does not outstrip the borough’s infrastructure.”</p> <p>Historically a relief road or bypass has been considered for many decades, including a 2005 variation, with discussions with WSSC, HDC and WSSC but despite various evidence base documents over decades, this Local Plan Review Policy ST4 in 2023 still fails to identify a defined route, but instead protects a very large area of</p>

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			<p>search. In the recent May 2023 evidence base this is now extended even further the scope of the area, affecting more existing buildings to the south and proposing an even wider area of safeguarding, also protected by GAT2.</p> <p>Despite the significant delays in the Horsham District Plan and the CBC Local Plan, which has occurred due to the issues around Water Neutrality, no clear alignment route exists. There is still no route nor further agreement from parties about any alignment, after decades of assessment (and more recently more than 4 years of Local Plan Review). Policy ST4 and the SA make clear a route is required but the policy continues to fail to confirm when or where it will be constructed.</p> <p>The policy fails to reduce the impact of any route, and instead the criteria-based policy lists general considerations, including design and impact and sustainable transport that are covered by other policies in the Local Plan. Therefore, the only role of the policy is to “safeguard” land; land that is already safeguarded for potential airport purposes under GAT2. Therefore, ST4 and GAT2 are mutually inconsistent, ineffective, unjustified, and unsound.</p> <p>Inconsistent to GAT2, the council’s position is that under ST4 a new relief road could be acceptable development subject to the criteria being met. The policy does not require any alignment to be consistent with safeguarding nor the 2019 GAL Masterplan and acknowledges that land will be required for necessary infrastructure.</p> <p>This is at odds with the clear evidence provided in Jersey Farm masterplan 0390-RDJWL-ZZ-XX-DR-A-0058-S3-P2, which illustrates a potential alignment that meets the technical specification set out in the SYSTRA report. We have reviewed the SYSTRA report, which considers a total of 19 options for the route of the eastern end of the CWMRTL northern section, including two options which pass through the Jersey Farm site.</p> <p>Connect Consultants’ transport report notes at para 3.2 that “<i>The Jersey Farm site lies within this section. Option ES3, as shown in the SYSTRA report extract above, is the most closely aligned of the 19 route options to that which is proposed in the Jersey Farm masterplan. The report acknowledges that there are clear benefits to this route option, with the obvious caveat that it encroaches into the safeguarded land by c.155m.</i>” (emphasis added).</p> <p>Para 5.3.5 of the SYSTRA report confirms again that the option has been explored “<i>to explore an alignment if it can be introduced before (if) Gatwick expands.</i>” The Local Plan evidence also recognises “<i>it could be several decades before Gatwick needs to bring forward a southern runway if it ever does so</i>”. This para also confirms that it ties in “<i>with London Road at Hydehurst lane which has been identified as the preferred location and which match the new roundabout location proposed in the GAL masterplan</i>”.</p> <p>The SYSTRA report states that only GAL raised concerns, requesting that options ES3 and ES3a should be sifted-out. 7 other options considered also encroach on safeguarded land but no objection to these options were raised by GAL. Given the preferred roundabout location, and the trajectory to link with Hydehurst Lane the SYSTRA report also confirms that further detailed designs will be needed regarding the road and the Gatwick masterplan 2019, recognising that neither are confirmed or ready for delivery.</p>

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			<p>Para 1.2.5 of the SYSTRA report also confirms that <i>“Private landowners were not consulted as part of this commission based on the early stage of the scheme and that the Area of Search would be consulted on through Local Plan consultation and examination. It is expected that further detailed consultation directly with potentially affected Landowners will take place during future stages in the delivery of the route”</i>.</p> <p>The Stantec ‘Crawley Transport Study’ concludes that a more detailed study is necessary to consider how the CWMML and its junctions may be designed to elicit the best attributes of the CWMML while minimising or eliminating any potential adverse impacts.</p> <p>We agree that the Area of Search identified still requires further consideration and detailed assessment but believe that our masterplan indicates a deliverable and suitable route for the CWMML, aligning with the wider Local Plan objectives. We believe that not having early engagement with our client and other local landowners, yet covering a very large area of land with further potential restrictions is flawed, unjustified and ineffective, and contrary to the council’s own SCI, especially part 4 figure 1.</p> <p>Our client has assembled land and implemented the recent planning permission reference CR/2019/0696/FUL yet no engagement on mechanisms to provide the CWMML have been discussed and only through assessment of the Local Plan Review was it evident that a further restriction was being recommended by CBC. The lack of defined route, clarity on delivery regarding purchase, CPO or timelines is therefore flawed and ST4 should be redrafted to reflect a more transparent relationship with the GAL Masterplan and the proposed location of any roundabout at London Road. Policy ST4 should also clarify further any relationship between West of Crawley (HDC) and any other potential extensions to Manor Royal as a result. However, what is clear is that the council considers that the road is required, and it would override safeguarding under GAT2. The local plan is therefore inconsistent and unjustified.</p> <p>In the May 2023 SA, the site assessment of land at Jersey Farm, under objective 8 on providing sufficient infrastructure it states that <i>“It is possible that opportunities may exist to access the site longer-term via a western Crawley multi-modal link road, potentially avoiding development exacerbating existing traffic congestion at County Oak. However, the site cannot be allocated due to the requirement to retain safeguarding, as it is predominantly located on land that is needed for the physical land take of a southern runway, road diversions and other operational uses should this be required. Therefore, there is risk that the potential delivery of nationally significant infrastructure, in the form of a southern runway, would be prejudiced were this site to come forward.”</i></p> <p>The SA therefore scores this site as having a <i>Significant Negative Impact</i> (--). We do not agree that this site should have been given a red, significant negative impact scoring, especially when considered against Gatwick Green and the significant benefits of providing 40.372sp.m GEA of floor space to the North of Manor Royal (as illustrated by our Masterplan).</p>

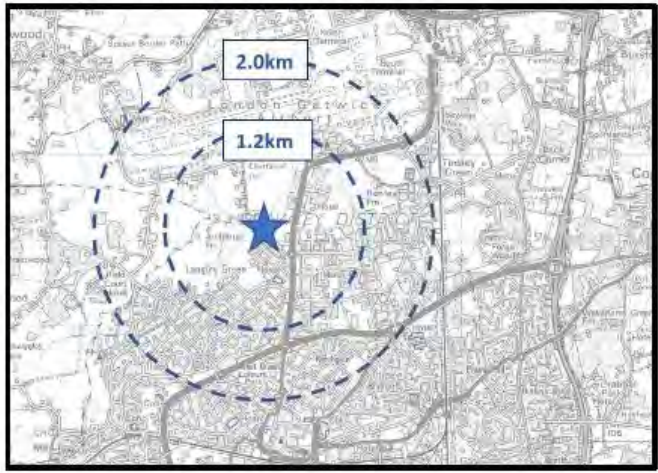
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			<p>Conclusion: We are grateful for the opportunity to comment as part of this Regulation 19 Local Plan Review. For the reasons set out above, we consider the Local Plan Review and the Sustainability Appraisal are unjustified, ineffective, contrary to national policy and therefore unsound. In particular:</p> <ul style="list-style-type: none"> • Economic Growth and employment policies EC1, EC2, EC3, EC4 and EC5; • Gatwick policies GAT2 and GAT3; • Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link; • more general policies relation to Sustainable Transport ST1 and ST2, Sustainable Development SD1, Water Neutrality Policy SDC4; and • CL3 on Character Landscape and Form, and CL8 Development Outside the Built Up Area Boundary CL8. <p>We wish to participate in the Examination Hearings in relation to the policies identified above and look forward to hearing from CBC in due course regarding formal submission to PINS.</p> <p>Technical Note:</p> <p>1.0 Introduction and Context</p> <p>1.1 Crawley Borough Council (CBC) is currently consulting on its Draft Local Plan (Regulation 19 consultation).</p> <p>1.2 Connect Consultants has been instructed to consider the traffic and transport aspects of a site which could potentially be allocated for development as a strategic employment site within the Crawley Local Plan.</p> <p>1.3 The site is on land to the north of Crawley and adjacent to Manor Royal, known herein as Jersey Farm.</p> <p>1.4 The site comprises approximately 20 hectares of largely undeveloped greenfield land, located south of Gatwick Airport and northwest of the Manor Royal employment zone on the north side of Crawley.</p> <p>1.5 The site lies partially within the Gatwick Safeguarded Land (CBC Local Plan Policy GAT2), and partially within the Indicative Search Corridor for a Crawley Western Multi-Modal Transport Link (CWMMTL) (CBC Local Plan Policy ST4) [previously known as the Crawley Western Link Road (CWLRL)] which passes approximately east-west through the site.</p> <p>1.6 The Local Plan evidence base is supported by strategic traffic modelling undertaken by Stantec on behalf of CBC. The “Crawley Transport Study: Transport Study of Strategic Development Options and Sustainable Transport Measures: Draft Crawley Local Plan 2021 – 2037” by Stantec (dated December 2020).</p> <p>1.7 Revision E of the Stantec report, dated 23rd June 2022, was published as part of CBC’s evidence base for public consultation in May 2023.</p> <p>1.8 The report states that all three of the local plan scenarios which are modelled include 2,095sqm of B8 use on Land at Jersey Farm (Site A), which is not included in the Reference Case scenario.</p>

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			<p>1.9 Planning permission exists within the site for a unit of approximately 1,780sqm (gross external area) for B8 use, accessed off the northwest end of County Oak Way.</p> <p>1.10 The Jersey Farm site would be offered as an employment site comprising a mix of office, light industry, and warehousing/distribution land-uses in buildings of various sizes, as an extension to the existing Manor Royal employment zone.</p> <p>1.11 For the purposes of the traffic assessment herein, the proposed Jersey Farm development is assumed to not exceed the following quanta:</p> <ul style="list-style-type: none"> • 48,150sqm Warehousing. • 4,070sqm Industrial/Business uses. <p>1.12 An initial illustrative site masterplan is provided at Appendix 1.</p> <p>1.13 Connect Consultants engaged in a formal pre-application enquiry with the Local Highway Authority (LHA) West Sussex County Council (WSCC) via a video-meeting on 16th June 2021. The advice received from WSCC following that meeting has been used to guide the next stages of work, which are set out within this Technical Note (TN).</p> <p>2.0 Site Access Arrangements</p> <p>2.1 The site benefits from an existing access route via County Oak Way, providing vehicle and non-vehicle access, and from Public Rights of Way connecting the site to County Oak Lane / Whitworth Road, and to the A23 London Road.</p> <p>2.2 The site also benefits from approximately 120m of its eastern boundary lying congruent with the public highway on the western side of the A23 London Road, opposite the junction of the A23 with Hydehurst Lane.</p> <p>Pedestrian Access</p> <p>2.3 The Institute of Highways and Transportation (IHT) guidance document titled 'Providing for Journeys on Foot' identifies a maximum walk distance of 2.0km for commuter, school and sightseeing walk trips, 800m for town centre walk trips and 1.2km for trips elsewhere.</p> <p>2.4 The approximate 2.0km commuter walk catchment and the 1.2km catchment, based on an 'as the crow flies' distance from the approximate centre of the Jersey Farm site, are shown at Figure 2.1.</p>

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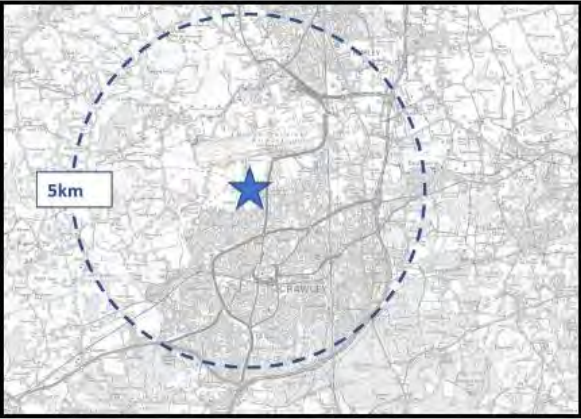
Figure 2.1 – 1.2km and 2.0km Walk Catchment



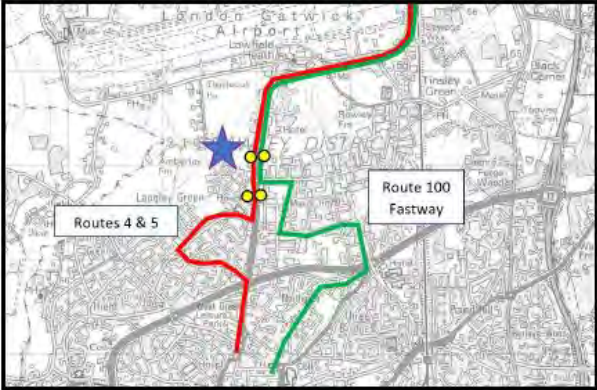
Map sources: Bing / Ordnance Survey. Site is denoted by a blue star.

- 2.5 Figure 2.1 indicates that the residential areas of Langley Green, Ifield, and West Green lie within the 2km walk-commute catchment, comprising a resident population of approximately 17,000. To the east of the site, the walking catchments include the adjoining County Oak Retail Park, and also the Manor Royal business quarter and Northgate area.
- 2.6 The Jersey Farm site benefits from Public Rights of Way connecting the site to County Oak Lane / Whitworth Road, and to the A23 London Road. It has direct access to the existing network of pedestrian footways and road crossings within the County Oak and Manor Royal areas, and therefore has ready-made pedestrian connections between the site and the surrounding areas, including residential areas and other employment and retail land uses.
- 2.7 The site is located within the CBC corridor of search for the CWMRTL which would connect the site to major new residential areas to the south-west, which could be as close as 1.6km to Jersey Farm. The delivery of the CWMRTL would bring with it a dedicated pedestrian and cycling route, thereby providing a direct link between Jersey Farm and significant new residential areas.
- 2.8 The Jersey Farm site provides realistic opportunities for future employees and visitors to travel on foot.



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			<p><u>Cycle Access</u></p> <p>2.9 The 2019 National Travel Survey identified average journey lengths by cycle in England of c.5.3km. This suggests that cycling can offer a realistic alternative to car travel, particularly for trips of less than approximately 5km.</p> <p>2.10 Cycling has the potential to play an important part in sustainable travel to and from the proposed development for visitors and staff.</p> <p>2.11 Using 5km as an indicator of the national average cycling distance, the approximate cycle catchment of the Jersey Farm site is shown at Figure 2.2 below.</p> <p>2.12 The 5km cycle catchment includes the majority of Crawley to the south and southeast, all of Gatwick Airport, and the southern portion of Horley, to the north. This comprises a total resident population of approximately 120,000 within the 5km catchment.</p> <p>2.13 The 5km cycle catchment encompasses a significant local population within cycle distance of the site, and with direct access to the existing network of cycle routes and infrastructure within Manor Royal and wider Crawley, there are real opportunities for future employees and visitors to travel by bike.</p> <p>2.14 The future delivery of the CWMRTL would bring with it a dedicated pedestrian and cycling route, thereby providing a direct link between Jersey Farm and significant new residential areas.</p> <p>Figure 2.2 – 5km Cycle Catchment</p>  <p><i>Map source: Bing / Ordnance Survey. Site is denoted by a blue star.</i></p>

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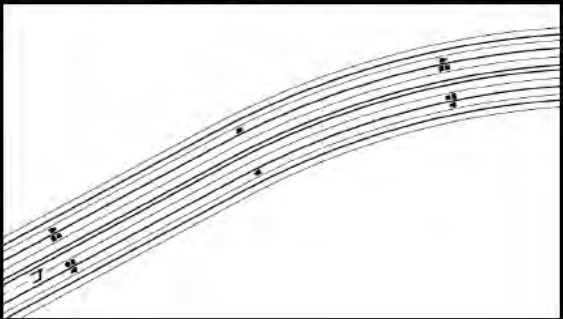
Ref. No.	Respondent	Policy/ Para	Comments
			<p><u>Bus Access</u></p> <p>2.15 The closest bus stops to the Jersey Farm site are on London Road adjacent to the site's eastern boundary. These are served by regular and frequent buses on Routes 4 and 5 (providing four buses per hour), and the 100 Fastway service (providing three buses per hour).</p> <p>2.16 There is also a bus stop located on County Oak Way, adjacent to the Retail Park, which is also served by buses on Routes 4 and 5. This stop is approximately 500m from the southern boundary of the Jersey Farm site, accessible on foot via County Oak Way and via Whitworth Road / County Oak Lane.</p> <p>2.17 These bus stops and routes are shown in Figure 2.3, below.</p> <p>Figure 2.3 – Bus Routes Map</p>  <p><i>Map source: Bing / Ordnance Survey. Site is denoted by a blue star.</i></p> <p>2.18 The Crawley Growth Programme includes improvements to bus infrastructure within the Manor Royal area, aimed at enhancing and promoting bus travel. The plans include replacing the existing bus stop on County Oak Way with two new stops nearby on London Road.</p> <p>2.19 The future delivery of the CWMMTL would bring with it bus lanes in both directions, providing a connection between the Jersey Farm site and the major new residential areas to the west. The Jersey Farm masterplan is capable of providing bus stops within the site, with interconnectivity with the on-site pedestrian network.</p> <p>2.20 The bus stops could be exemplar 'superhubs', with all-round weather protection, bartype work station with charging points, CCTV, lighting, landscaping/planting/green roof, electric scooter/bike docks, adjacent coffee shop etc.</p>

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			<p><u>Vehicular Access</u></p> <p>2.21 The Jersey Farm proposal is that vehicle access will be solely via a new priority controlled (give-way) left-in-left-out (LILO) junction connecting the site access road to the east side of the A23 London Road. Vehicular access will not be permitted via the County Oak Way access.</p> <p>2.22 The design of the new LILO junction on the A23 London Road has been informed by traffic modelling, capacity testing, and swept-path tracking of the largest vehicles expected to use them, and has been subject to a Stage 1 Road Safety Audit (RSA).</p> <p>2.23 The proposed design of the Jersey Farm LILO junction is provided at Appendix 2, which shows the swept-path tracking of a 16.5m articulated truck.</p> <p>2.24 The length of deceleration lane is limited by the available land within the Jersey Farm promotor's control. The deceleration lane length is consequently one step below the DMRB standard for a 120kph road which is considered acceptable in this instance because the junction location is only c.60m past the derestricted speed signs (derestricted from 40mph), and northbound vehicles will generally not be up to speed having just left the Fleming Way roundabout.</p> <p>2.25 The RSA considered the highway safety of the proposed junction design and concluded that the audit team were unable to identify any areas of concern regarding highway road safety. The RSA Report is provided at Appendix 3.</p> <p>3.0 Crawley Western Link Road – Northern Section Study</p> <p>3.1 CBC has commissioned SYSTRA to undertake a study into the area of search corridor for the northern section of the CWMMTL (the section of the CWMMTL between Charlwood Road and the A23 London Road).</p> <p>3.2 The Jersey Farm site lies within this section.</p> <p>3.3 The SYSTRA report sets out the design criteria for the CWMMTL as follows:</p> <ul style="list-style-type: none"> • All-purpose dual carriageway multi-modal link inclusive of one traffic lane and one bus lane' in each direction; • 70kph design speed (40mph speed limit) which may be reduced to meet surroundings' requirements i.e. County Oak Industrial Area; • Each carriageway 7.3m wide consisting of two 3.65m wide lanes, one lane for general traffic and one for public transport; • 2m central median is provided between the carriageways; and • 3m planting strip, 2.5m walking infrastructure, and 3.5m cycling facilities provided on each side of the carriageway. <p>3.4 The SYSTRA study divides the northern section of the CWMMTL route into three parts. It considers a total of 19 options for the route of the eastern end of the CWMMTL northern section, including two options which pass</p>

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			<p>through the Jersey Farm site. These are named Option ES3 and ES3a, which are described at paragraphs 5.3.5 and 5.3.6, respectively, of the SYSTRA report.</p> <p><u>Option ES3</u></p> <div data-bbox="685 392 1317 667" data-label="Complex-Block"> <div style="display: flex;"> <div style="flex: 1;"> <p>5.3.5 Option ES3 has been developed to explore an alignment which can be introduced before (if) Gatwick expands. This option is proposed because it could be several decades before Gatwick needs to bring forward a southern runway, if it ever does so. ES3 doesn't require any commercial buildings to be removed but it encroaches into the safeguarded land by about 155m. This option provides a consistent Optimal cross-section (see Figure 7), it doesn't affect the existing brideway or road network and it ties-in with London Road at Hydehurst Lane which has been identified as the preferred location and which match the new roundabout location proposed in the GAL Masterplan.</p> </div> <div style="flex: 1;">  </div> </div> <p><i>Source: Crawley Western Link Road – Northern Section Study, SYSTRA, March 2023</i></p> <p>3.5 Option ES3, as shown in the extract above, is the most closely-aligned of the 19 route options to that which is proposed in the Jersey Farm masterplan. The report acknowledges that there are clear benefits to this route option, but with a caveat that it encroaches into the safeguarded land by c.155m. It is not clear what the 120m annotation refers to in the extract above.</p> <p><u>Option ES3a</u></p> <div data-bbox="685 906 1301 1187" data-label="Complex-Block"> <div style="display: flex;"> <div style="flex: 1;"> <p>5.3.6 Option ES3a is similar to ES3 with the difference that part of the public transport would be diverted along County Oak Way to provide connectivity with the retail area. In the long term, should Gatwick southern expansion take place, the public transport infrastructure will be maintained along County Oak Way but the general traffic lanes to the north will be removed and replaced with the Gatwick access plan. As per ES3, ES3a provides a consistent Optimal cross-section (see Figure 7) for the norther and western arm whilst also tying into Hydehurst Lane and not affecting the brideway. However, this option diverts part of the public transport onto County Oak Way (with a similar cross-sections to the existing County Oak Way) therefore affecting the existing road network.</p> </div> <div style="flex: 1;">  </div> </div> <p><i>Source: Crawley Western Link Road – Northern Section Study, SYSTRA, March 2023</i></p> <p>3.6 This route option is very similar to that shown in the Jersey Farm masterplan, but with the public transport route diverting along County Oak Way, which has width constraints.</p> <p><u>Stakeholder Engagement and Option Sifting</u></p> <p>3.7 The SYSTRA report states that the route options were discussed with the following stakeholders:</p> </div></div>

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			<ul style="list-style-type: none"> • Crawley Borough Council • Environment Agency • Gatwick Airport Limited • Homes England • Horsham District Council • West Sussex County Council. <p>3.8 The SYSTRA report states that only GAL raised concerns, requesting that options ES3 and ES3a should be sifted-out. However, these two options were retained for further analysis due to their substantial benefits over the alternative options.</p> <p>3.9 The relevant extract from the SYSTRA report is provided below.</p> <div style="border: 1px solid black; padding: 5px;"> <p>6.3.3 GAL also requested that Route Options ES3 and ES3a should be sifted out. Sifting of these two options was given substantial consideration. It is known that their alignments would likely encroach into the operational area of potential Gatwick Airport southern runway. However, when considered alongside the alternative Eastern Section options, it was felt that there were substantial benefits to these two route options which warranted their retention at the sifting stage to analyse their pros and cons during the MCA analysis stage.</p> <p>6.3.4 It is worth noting that some of the other remaining live Options (WS1, WS3, WS4, MS2, MS3, MS4 & ES2) encroach slightly into the current safeguarded land related to Gatwick Airport, but this was not raised as an issue, by Gatwick Airport Limited, given the acceptance that future design development work is required for both the CWLR and the Gatwick southern runway Masterplan.</p> </div> <p><i>Source: Crawley Western Link Road – Northern Section Study, SYSTRA, March 2023</i></p> <p>3.10 The route options, including ES3 and ES3a, were considered under a multi-criteria analysis (MCA) to further assess the pros and cons of each option.</p> <p>3.11 The results of the MCA show that ES3a performs the best overall, with ES3 being the second-best.</p> <p>3.12 While GAL maintained its objection to both of these options due to the encroachment on the safeguarded land, SYSTRA states:</p>

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			<p data-bbox="689 288 1444 403">7.9.3 The MCA demonstrated that option ES3 and particularly ES3a could have substantial positive aspects in comparison to the other Eastern route options. It is acknowledged that these options are unlikely to be able to coexist with a Gatwick southern runway, but the possible significant interim positives prior to a potential future southern runway expansion may warrant further investigation. In this instance, an alternative option post-southern runway</p> <p data-bbox="752 427 770 440">...</p> <p data-bbox="689 456 1444 507">Implementation must also be agreed upon as part of a business case analysis in order to make ES3 and ES3a a feasible option.</p> <p data-bbox="689 523 1249 542"><i>Source: Crawley Western Link Road – Northern Section Study, SYSTRA, March 2023</i></p> <p data-bbox="678 571 1126 596"><u>Refined Area of Search – Conclusions</u></p> <p data-bbox="678 603 1977 692">3.13 SYSTRA concludes by defining a refined area of search for the northern/eastern section of the CWMMTL. Given the uncertainty over the feasibility of the best-scoring options ES3a and ES3, a separate area of search boundary has been defined to include these.</p> <p data-bbox="678 711 1126 737"><u>CWMMTL Route through Jersey Farm</u></p> <p data-bbox="678 743 1951 801">3.14 The new access road and the Jersey Farm masterplan have been designed so as to facilitate the future provision of the CWMMTL, such that the new site access road could ultimately form part of the CWMMTL.</p> <p data-bbox="678 820 1977 877">3.15 This would require upgrading the Jersey Farm LILO junction with the A23 London Road, which would be subject to further assessment and design work, and to the availability of additional land which may be required.</p> <p data-bbox="678 896 1977 1018">3.16 Land within the Jersey Farm site will be safeguarded to allow the CWMMTL to be connected to the access road from the west, and to allow the access road to be widened to accommodate bus lanes and pedestrian/cycleways to be consistent with the anticipated design of the CWMMTL. This is shown in Figure 3.1, and on the illustrative site masterplan provided at Appendix 1.</p> <p data-bbox="689 1037 1189 1056">Figure 3.1 – Potential Future Upgrade to Accommodate CWMMTL</p> 

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			<p>4.0 Traffic Analysis and Junction Capacity Assessment</p> <p>Jersey Farm Vehicle Access</p> <p>4.1 The initial stage of the analysis was to consider the potential for some of the proposed Jersey Farm development to be accessed via County Oak Way.</p> <p>4.2 A computer model (LinSig) of the A23 / County Oak Way signal-controlled junction has been purchased from WSCC. The model represents the forthcoming form of the junction once a WSCC-planned capacity-improvement scheme has been completed.</p> <p>4.3 The LinSig model has been used to assess the expected future ability of County Oak Way to accommodate additional traffic to/from the Jersey Farm development.</p> <p>4.4 To do this, the model was run using traffic flow data extracted from each of the future assessment scenarios of the CBC strategic traffic model. The extracted traffic flow data was supplied to Connect Consultants by Stantec on behalf of CBC.</p> <p>4.5 The junction capacity analysis shows that future capacity at the A23 / County Oak Way junction is not sufficient to accommodate a viable amount of the proposed Jersey Farm development.</p> <p>4.6 As such, the proposal is that all vehicular access will be via a new LILO junction connecting the site access road to the east side of the A23 London Road.</p> <p><u>Local Road Network</u></p> <p>4.7 As the proposed LILO access junction requires Jersey Farm traffic to U-turn at Lowfield Heath Roundabout and Fleming Way Roundabout, both roundabouts have been considered in terms of their future ability to accommodate the proposed development traffic in the weekday AM and PM peak hours.</p> <p>4.8 The following sections set out the analysis of the future capacity and operation of Lowfield Heath Roundabout and Fleming Way Roundabout in the CBC Local Plan scenarios.</p> <p><u>CBC Local Plan Strategic Traffic Modelling Scenarios</u></p> <p>4.9 The CBC Local Plan strategic traffic modelling assesses the traffic impact of three different Local Plan scenarios (Scenarios 1-3).</p> <p>4.10 In terms of employment sites, Scenario 1 includes only sites in the Employment Land Trajectory.</p> <p>4.11 Scenario 2 is the same as Scenario 1 with the addition of a strategic employment site at Gatwick Green.</p> <p>4.12 Scenario 3 is the same as Scenario 2 with the addition of the potential new settlements known as West of Ifield and West of Kilnwood Vale within Horsham District.</p>

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			<p>4.13 An additional scenario is included to test the effect of providing the CWMRTL to mitigate the impact of the potential new settlements in Scenario 3. This is known as 'Scenario 3 with CWLR'.</p> <p>4.14 Each of the scenarios is assessed in the strategic modelling both with and without the effect of a proposed package of sustainable travel measures aimed at reducing the number of car-borne journeys made in the borough.</p> <p><u>CBC Local Plan Traffic Flows and Junction Capacity</u></p> <p>4.15 The forecast traffic flow data at both Lowfield Heath Roundabout and Fleming Way Roundabout in each of the CBC Local Plan assessment scenarios has been purchased from Stantec/CBC in June 2023.</p> <p>4.16 The CBC Local Plan strategic traffic modelling provides a high-level indication of the operation of junctions in the forecast traffic scenarios, in terms of the ratio of predicted volume of traffic against the theoretical capacity of a junction. This is known as 'volume over capacity' or V/C, expressed as a percentage of a junction's theoretical capacity.</p> <p>4.17 The data purchased from CBC includes the predicted V/C for each of the turning movements on the approaches to both roundabouts.</p> <p>4.18 It shows that Lowfield Heath Roundabout is predicted to be over-capacity in the weekday AM peak hour in scenarios LP1, LP2, and LP3 (ranging from 103% to 106%), and also in the scenario 'LP3 with CWLR' (101%). In the weekday PM peak it is predicted to be over-capacity only in scenario LP3 (at 102%).</p> <p>4.19 Fleming Way Roundabout is predicted to be within capacity in all scenarios in the weekday AM and PM peak-hours, except for the AM peak in scenarios LP3 and 'LP3 with CWLR' without sustainable mitigation (100% and 104% respectively), and scenario 'LP3 with CWLR' with sustainable mitigation (104%).</p> <p>4.20 Given that both roundabouts are indicated by the CBC strategic traffic modelling to be over-capacity in various of local plan future scenarios, more detailed junction capacity analysis has been undertaken to more accurately assess the ability to accommodate the proposed Jersey Farm development traffic.</p> <p><u>Jersey Farm Development Traffic Generation</u></p> <p>4.21 Pre-application advice received from WSCC Highways suggests the use of "the vehicular trip rates used at Table 3.1 of the published Crawley Local Plan transport study, unless there is compelling evidence to support any significant difference for this site".</p> <p>4.22 The CBC Transport Study Table 3.1 identifies weekday AM and PM peak-hour trip rates for a range of land-uses, including warehousing and industrial estate uses which are proposed at Jersey Farm. Those trip rates, and the resultant weekday AM and PM peakhour trip numbers for the proposed maximum 48,150sq.m of warehousing and 4,070sq.m. of industrial estate uses are set out in Table 3.1.</p>

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Table 3.1 – Jersey Farm Trip Rates & Trip Numbers (CBC Transport Study)

Warehousing Vehicles	Trip Rates per 100sqm			Trip Numbers per 48,150 sqm		
	Arrivals	Departures	Total	Arrivals	Departures	Total
AM peak	0.121	0.049	0.17	58	24	82
PM peak	0.017	0.076	0.093	8	37	45
Industrial Estate Vehicles						
Industrial Estate Vehicles	Trip Rates per 100sqm			Trip Numbers per 4070 sqm		
	Arrivals	Departures	Total	Arrivals	Departures	Total
AM peak	0.436	0.153	0.589	18	6	24
PM peak	0.119	0.407	0.526	5	17	21
Total site						
	Arrivals	Departures	Total	Arrivals	Departures	Total
AM peak	0.557	0.202	0.759	76	30	106
PM peak	0.136	0.483	0.619	13	53	66

4.23 The vehicle trip rates shown in Table 3.1 represent all vehicles. For the purposes of junction capacity assessment associated with the proposed industrial / commercial uses, it is important to understand how much of the development traffic is heavy goods vehicle (HGV) traffic.

4.24 The CBC Transport Study does not identify the number or proportion of HGVs, so this information has instead been derived from the industry-standard TRICS database.

4.25 A sample of traffic survey data from development sites with similar characteristics to Jersey Farm has been selected from TRICS using the selection criteria set out in Table 3.2.

Table 3.2 – TRICS Database Selection Criteria

TRICS 7.10.1 key selection criteria	
Land use and trip rate selection	
Select Land Use By:	Full list Of Active Main/Sub Land Uses
Main Land Use:	02 - EMPLOYMENT
Sub Land Use:	F - WAREHOUSING (COMMERCIAL) D - INDUSTRIAL ESTATE
Calculation Options:	Vehicle Trip Rates
Regions:	All England excluding Greater London
Primary filtering	
Trip Rate Parameters:	Gross Floor Area
Range:	10,000 – 80,100 sq.m. 708 - 10,000 sq.m.
Selected Dates:	01/01/15 to 22/11/21 01/01/15 to 18/11/22
Week days to include:	Weekdays
Location Types to include:	Edge of Town
Secondary filtering	
Population < 1 Mile:	Default range (<20,000) 1,000 - 50,000
Population < 5 Miles:	Default range (125,001 - 500,000)

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			<p>4.26 Based on the average of the resultant sample sites, the proportion of HGVs (referred to as Other Goods Vehicles [OGVs] in TRICS) for the two proposed land uses in the AM and PM peak hours are set out in Table 3.3.</p> <p>4.27 The full TRICS output reports can be supplied if required.</p> <p>Table 3.3 – Proportion and Number of HGVs (from TRICS and CBC data)</p> <table border="1"> <thead> <tr> <th rowspan="2">Warehousing OGVs</th> <th colspan="3">OGV as % of total vehicles (from TRICS)</th> <th colspan="3">Number of OGVs (TRICS % applied to CBC total)</th> </tr> <tr> <th>Arrivals</th> <th>Departures</th> <th>Total</th> <th>Arrivals</th> <th>Departures</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>AM peak</td> <td>37%</td> <td>56%</td> <td>46%</td> <td>21</td> <td>13</td> <td>38</td> </tr> <tr> <td>PM peak</td> <td>72%</td> <td>21%</td> <td>42%</td> <td>6</td> <td>8</td> <td>19</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th rowspan="2">Industrial Estate OGVs</th> <th colspan="3">OGV as % of total vehicles (from TRICS)</th> <th colspan="3">Number of OGVs (TRICS % applied to CBC total)</th> </tr> <tr> <th>Arrivals</th> <th>Departures</th> <th>Total</th> <th>Arrivals</th> <th>Departures</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>AM peak</td> <td>4%</td> <td>4%</td> <td>4%</td> <td>1</td> <td>0</td> <td>1</td> </tr> <tr> <td>PM peak</td> <td>3%</td> <td>1%</td> <td>1%</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <p>4.28 The numbers of total vehicles associated with Jersey Farm in the AM and PM peak hours (from Table 3.1) and the constituent numbers of HGVs (from Table 3.3) are set out in Table 3.4.</p> <p>Table 3.4 – Jersey Farm Development AM and PM Peak Hour Traffic</p> <table border="1"> <thead> <tr> <th rowspan="2">Whole site</th> <th colspan="3">Total Vehicles (from Table 3.1)</th> <th colspan="3">Constituent OGVs (from Table 3.3)</th> </tr> <tr> <th>Arrivals</th> <th>Departures</th> <th>Total</th> <th>Arrivals</th> <th>Departures</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>AM peak</td> <td>76</td> <td>30</td> <td>106</td> <td>22</td> <td>13</td> <td>39</td> </tr> <tr> <td>PM peak</td> <td>13</td> <td>53</td> <td>66</td> <td>6</td> <td>8</td> <td>19</td> </tr> </tbody> </table> <p><u>Jersey Farm Traffic Distribution</u></p> <p>4.29 Given the location of the Jersey farm site and the layout of the local road network, the simplifying assumption is made that the Jersey Farm development traffic will be split equally to/from the north and south at the proposed site access junction on the A23 London Road.</p> <p>4.30 With a LIL0 access junction, all Jersey Farm traffic would have to U-turn on arrival or departure, which would involve the Lowfield Heath Roundabout north of the junction and Fleming Way Roundabout south of the junction.</p> <p>4.31 The distribution of the development traffic beyond both Lowfield Heath Roundabout and Fleming Way Roundabout (i.e., traffic not U-turning on arrival/departure) is assumed to be proportionate to the background traffic, identified by the CBC strategic traffic modelling.</p> <p>4.32 The distribution of the proposed Jersey Farm traffic in the weekday AM and PM peak hours is shown on diagrams provided at Appendix 4.</p>	Warehousing OGVs	OGV as % of total vehicles (from TRICS)			Number of OGVs (TRICS % applied to CBC total)			Arrivals	Departures	Total	Arrivals	Departures	Total	AM peak	37%	56%	46%	21	13	38	PM peak	72%	21%	42%	6	8	19	Industrial Estate OGVs	OGV as % of total vehicles (from TRICS)			Number of OGVs (TRICS % applied to CBC total)			Arrivals	Departures	Total	Arrivals	Departures	Total	AM peak	4%	4%	4%	1	0	1	PM peak	3%	1%	1%	0	0	0	Whole site	Total Vehicles (from Table 3.1)			Constituent OGVs (from Table 3.3)			Arrivals	Departures	Total	Arrivals	Departures	Total	AM peak	76	30	106	22	13	39	PM peak	13	53	66	6	8	19
Warehousing OGVs	OGV as % of total vehicles (from TRICS)				Number of OGVs (TRICS % applied to CBC total)																																																																															
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			<p><u>Junction Capacity Assessments – Without Jersey Farm Traffic</u></p> <p>4.33 The ARCADY computer program is an industry standard computer package for modelling the operation of roundabouts. ARCADY uses the geometry of the junction combined with traffic flow information to predict capacity. The software provides a number of results in its output; often the most meaningful metric is the Ratio of Flow to Capacity (RFC), where an RFC of 1.00 on any approach to the junction reflects a traffic flow equal to the theoretical capacity of that approach.</p> <p>4.34 ARCADY is typically operated using ‘One Hour’ mode which estimates the traffic flow profile for an hour-long period based on a bell-shaped curve with a 15-minute ‘Warm Up’ period before, and a 15-minute ‘Cool Down’ period either side of the 60-minute peak-hour. This simulates the robust scenario of a peak within the peak hour.</p> <p>4.35 ARCADY models have been created of both Lowfield Heath Roundabout and Fleming Way Roundabout. These models use the same geometric parameters as those which have been accepted by the Local Highway Authority, WSCC, through the Transport Assessment of a recent planning application at Hydehurst Lane (CBC planning reference CR/2021/0167/FUL).</p> <p>4.36 The computer models of the roundabouts are therefore consistent with those which have already been considered to be acceptable for simulating the capacity and delay of the two roundabouts.</p> <p><u>Lowfield Heath Roundabout Without Jersey Farm Traffic</u></p> <p>4.37 The ARCADY model of Lowfield Heath Roundabout is shown to be approaching capacity or overcapacity in the weekday AM peak in all of the Local Plan Scenarios, with and without sustainable mitigation measures. The RFC on the A23 (north) approach is shown to range from 0.92 to 1.04, while on the Old Brighton Road approach it ranges from 0.91 to 0.97.</p> <p>4.38 In the weekday PM peak, the roundabout is shown to be approaching capacity in scenarios LP1 and LP2, and overcapacity in LP3 with and without sustainable mitigation and the CWMML.</p> <p>4.39 The summary results from the ARCADY software are provided at Appendix 5.</p> <p><u>Fleming Way Roundabout Without Jersey Farm Traffic</u></p> <p>4.40 The ARCADY modelling shows the A23 (north) approach to the Fleming Way Roundabout to be approaching capacity or overcapacity in the weekday AM peak in all of the Local Plan scenarios, with and without sustainable mitigation measures; its RFC ranges from 0.96 to 1.13. All other approaches are within capacity in the weekday AM peak in all scenarios.</p> <p>4.41 In the weekday PM peak, the roundabout is shown to be within capacity in all scenarios.</p> <p>4.42 The summary results from the ARCADY software are provided at Appendix 5.</p> <p><u>Junction Capacity Assessments – With the Addition of Jersey Farm Traffic</u></p>

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			<p>4.43 The CBC Local Plan scenario 'LP2' comprises the proposed Local Plan development plus the Gatwick Green strategic employment site.</p> <p>4.44 The aim of promoting the Jersey Farm development is to provide an alternative to Gatwick Green as the strategic employment site allocation in the CBC Local Plan.</p> <p>4.45 The equivalent scenario to 'LP2' is a scenario of 'LP1 plus Jersey Farm' (representing the Local Plan development plus Jersey Farm instead of Gatwick Green).</p> <p>4.46 Scenario 'LP3' is also considered because it includes the potential major development sites in neighbouring Horsham District Council. LP3 also includes traffic associated with Gatwick Green, so adding the proposed Jersey Farm traffic to this scenario will effectively double-count the traffic associated with strategic employment sites. However, it seems unlikely that much Gatwick Green traffic will use Lowfield Heath and Fleming Way roundabouts, so the double-counting effect is not likely to be significant.</p> <p>4.47 WSCC has published guidance on the assessment of junction capacity and the thresholds above which it considers the impact of a proposed development to be a material impact which requires mitigation. Reference to this guidance is included in the following sections.</p> <p><u>Lowfield Heath Roundabout with Jersey Farm Traffic</u></p> <p>4.48 Without Jersey Farm traffic, Lowfield Heath Roundabout is shown to be approaching capacity or overcapacity on the Old Brighton Road and the A23 (north) approaches in all scenarios in the weekday AM peak, and overcapacity on Old Brighton Road in the weekday PM peak in scenario 'LP3'.</p> <p>4.49 With the addition of Jersey Farm traffic, the RFC values on the Old Brighton Road and A23 (north) approaches increase by only a small absolute number in each of the scenarios (increase ranging from 0.02-0.04), but because the approaches are already overcapacity, the small increase in RFC translates to a disproportionately large increase in queue lengths and delay.</p> <p>4.50 A23 (north) approach: In all of the CBC Local Plan scenarios the increase in delay associated with Jersey Farm traffic in the AM peak is categorised by WSCC as a material impact and needs mitigating to nil-detriment.</p> <p>4.51 Old Brighton Road approach: In all of the CBC Local Plan scenarios the increase in delay associated with Jersey Farm traffic in the AM peak, and in the 'LP3' scenarios in the PM peak, is categorised by WSCC as a material impact and needs mitigating to nil-detriment.</p> <p>4.52 A23 (south) approach: In all of the CBC Local Plan scenarios the delay is less than 90 seconds except in 'LP3 with CWLR with Sustainable Mitigation' in which it exceeds 90 seconds. The impact of Jersey Farm on this approach is not material in any of the scenarios, so no mitigation is needed on this approach except in 'LP3 with CWLR with Sustainable Mitigation'.</p>

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			<p>4.53 The summary results from the ARCADY software are provided at Appendix 5; the orange-coloured cells in the summary tables indicate where the resultant delay exceeds the WSCC threshold for material impact which will require mitigation.</p> <p><u>Fleming Way Roundabout with Jersey Farm Traffic:</u></p> <p>4.54 Without Jersey Farm traffic, at Fleming Way Roundabout only the A23 (north) approach in the weekday AM peak is shown to be approaching capacity or overcapacity.</p> <p>4.55 With the addition of Jersey Farm traffic, the RFC value on this approach increases by only a small absolute number in each of the scenarios (0.04-0.05 increase), but because the approach is already over capacity, the small increase in RFC translates to a disproportionately large increase in queue length and delay.</p> <p>4.56 The A23 (north) approach is the only approach which is shown to have capacity issues.</p> <p>4.57 In all scenarios it is categorised by WSCC as a material impact and needs mitigating to nil-detriment.</p> <p>4.58 The summary results from the ARCADY software are provided at Appendix 5; the orange-coloured cells in the summary tables indicate where the resultant delay exceeds the WSCC threshold for material impact which will require mitigation.</p> <p>5.0 Proposed Mitigation</p> <p><u>Mobility Strategy and Site-Wide Travel Plan</u></p> <p>5.1 A key element of the Jersey Farm proposal is that it will incorporate a comprehensive Mobility Strategy which will ensure that sustainable travel is at the centre of the development's ethos.</p> <p>5.2 The development will maximise its inherent accessibility by non-car modes through a site wide Travel Plan to promote sustainable travel, including collaboration with Manor Royal BID, and will ensure the individual occupiers and operators promote non-car travel to their workforces.</p> <p><u>Physical Mitigation Schemes</u></p> <p>5.3 The junction capacity modelling, as described in the previous section, has identified that capacity improvement schemes will be required in the future CBC Local Plan scenarios to accommodate the proposed Jersey Farm traffic at both Fleming Way Roundabout and Lowfield Heath Roundabout.</p> <p>5.4 Based on the results of the ARCADY modelling described in the previous section, capacity improvement schemes have been identified at both Fleming Way Roundabout and Lowfield Heath Roundabout to mitigate the traffic impact of Jersey Farm.</p> <p><u>Fleming Way Roundabout</u></p> <p>5.5 The identified capacity improvement scheme provides the necessary capacity improvement on the A23 approach from the north (southbound). This comprises an additional lane on the southbound approach, which is</p>

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			<p>achieved by using some land from the grass verge, some from the splitter island, and some from the roundabout island. All of the land required to deliver this scheme is within the public highway.</p> <p>5.6 A drawing of the capacity improvement scheme, drawing number 21071-011, is provided at Appendix 6. The scheme takes into account the recommendations of a Stage 1 RSA which is provided, along with the Designer's Response, at Appendix 3.</p> <p>5.7 The capacity improvement scheme has been tested in ARCADY; the summary results of the improvement scheme in the various assessment scenarios are shown in Appendix 5, which show that the scheme results in the roundabout operating within capacity in all scenarios.</p> <p>5.8 An initial estimate of the cost to construct the scheme is c.£290,000.</p> <p><u>Lowfield Heath Roundabout</u></p> <p>5.9 The capacity improvement scheme at Lowfield Heath Roundabout creates a short length of one additional lane on the Old Brighton Road approach, and an additional lane on the A23 westbound approach. This is achieved using land entirely within public highway.</p> <p>5.10 A drawing of the capacity improvement scheme, drawing number 21071-012, is provided at Appendix 6. The scheme takes into account the recommendations of a Stage 1 RSA which is provided, along with the Designer's Response, at Appendix 3.</p> <p>5.11 The capacity improvement scheme has been tested in ARCADY; the summary results of the improvement scheme in the various assessment scenarios are shown in Appendix 5, which show that the scheme results in the roundabout operating within capacity in all scenarios.</p> <p>5.12 An initial estimate of the cost to construct the scheme is c.£690,000.</p> <p>6.0 Comparison with Gatwick Green Employment Site</p> <p>6.1 The CBC strategic traffic modelling assesses the traffic impact of three different Local Plan scenarios (1-3).</p> <p>6.2 In terms of employment, Scenario 1 includes only sites in the Employment Land Trajectory.</p> <p>6.3 Scenario 2 is the same as Scenario 1, with the addition of a strategic employment site at Gatwick Green. The Gatwick Green assumptions comprise 77,500sqm gross floor area, split into:</p> <ul style="list-style-type: none"> • B8 Parcels Distribution (10%) or 7,750 sqm • B8 Commercial Warehousing (60%) or 46,500 sqm • B2 Industrial estate (30%) or 23,250 sqm

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			<p><u>Gatwick Green Site</u></p> <p>6.4 In Scenario 2 (with Gatwick Green employment site), the Gatwick Green site is estimated to generate 333 two-way trips in the AM peak and 298 two-way trips in the PM peak.</p> <p>6.5 There are impacts predicted on the B2036 Balcombe Road for most of its length both north and south of the B2037 Antlands Lane junction with Balcombe Road. These impacts are greater in the PM peak than in the AM peak.</p> <p>6.6 A significant proportion of these trips are freight/HGV traffic that cannot be replaced by active modes or public transport. The modelling has assumed that there will be an element of car trips for employees working at the site and these would respond to sustainable mitigation measures.</p> <p>6.7 Overall, the residual Gatwick Green trips assumed to impact the network are 312 two-way trips in the AM peak and 281 trips in the PM peak.</p> <p>6.8 During the AM peak, 67 two-way trips are predicted to use the northern sections of Balcombe Road through Horley and beyond, while 245 two-way trips are predicted to use the southern sections of Balcombe Road and beyond.</p> <p>6.9 Around 68 two-way trips are predicted to use the rural routes east of the site, including Shipley Bridge Lane through Copthorne en-route to the motorway junction and Effingham Road to/from East Grinstead.</p> <p>6.10 The M23 junction 10 is predicted to be used by 55 of the Gatwick Green trips in the AM peak; none are predicted to use junction 9.</p> <p>6.11 During the PM peak, 65 two-way trips are predicted to use the northern sections of Balcombe Road through Horley and beyond, while 216 two-way trips are predicted to use the southern sections of Balcombe Road and beyond.</p> <p>6.12 Around 40 two-way trips are predicted to use the rural routes east of the site, including Shipley Bridge Lane through Copthorne en-route to the motorway junction and Effingham Road to/from East Grinstead; around the same number are predicted to use the southern part of Balcombe Road.</p> <p>6.13 The M23 junction 10 is predicted to be used by around 40 of the Gatwick Green trips in the PM peak; none are predicted to use junction 9.</p> <p>6.14 These predicted traffic flows to/from Gatwick Green are shown graphically on maps at Appendix 7. These clearly show the impact of the traffic on the surrounding local roads.</p>

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			<p>6.15 To mitigate the impacts of the Gatwick Green traffic on the surrounding local roads and lanes, an HGV ban is proposed for traffic heading to Gatwick Green from the north on Balcombe Road to prevent this traffic travelling through the built-up area in Horley.</p> <p>6.16 A right turn ban is also proposed for HGV traffic egressing the site, to prevent this traffic using the northern sections of Balcombe Road thus mitigating any potential adverse impacts from this HGV traffic such as noise and air pollution.</p> <p>6.17 A committed/planned new link road between the A2011 and Balcombe Road, designed to improve the access route to the North East Sector developments, is shown to have capacity problems in the Reference Case and the Local Plan scenarios, even after the proposed sustainable travel mitigation is applied.</p> <p>6.18 Clearly, there are concerns and issues regarding the Gatwick Green freight traffic using the local roads and lanes, and with Gatwick Green traffic generally on the surrounding road network.</p> <p><u>Jersey Farm Site</u></p> <p>6.19 Jersey Farm is located in an existing employment district, with purpose-built roads which connect to the principal and strategic road network.</p> <p>6.20 The site has ready-made non-car access options, providing excellent opportunities for the future occupiers to travel sustainably, and it offers safeguarded land for the future provision of the CWMMTL and its adjoining bus, foot, and cycle routes.</p> <p>6.21 The off-site traffic impact of Jersey Farm at the two closest roundabout junctions can be mitigated by relatively straightforward capacity improvement schemes which are effective, safe, deliverable, and viable.</p> <p>6.22 In comparison to the predicted Gatwick Green traffic flows, described above and shown at Appendix 7, the location of the Jersey Farm site means that its peak-hour traffic is likely to use the purpose-built, strategic routes.</p> <p>6.23 Traffic to/from the north will either travel via the A23 / A217 for Horley, Redhill, and Reigate, or via Airport Way and the M23 for longer journeys; it will not likely use Balcombe Road through Horley in the way that Gatwick Green traffic is predicted to do.</p> <p>6.24 Traffic to/from the east will use the A23 and A2011 dual carriageways and the A264 east of the M23; there is no reason for it to use rural lanes and road around Copthorne, as predicted for the Gatwick Green traffic.</p> <p>6.25 Traffic to/from the south will use the A23 dual carriageway Crawley Avenue and the M23 via junction 11; traffic to/from the west will use the A2220 dual carriageway Horsham Road and the dual carriageway A264.</p> <p>6.26 These route options for Jersey Farm traffic are shown graphically on a map at Appendix 7.</p>

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			<p>6.27 Jersey Farm's location means that its traffic to/from the motorway network has the choice of three motorway junctions, depending on direction of travel; it would not all be loaded on to M23 junction 10 as Gatwick Green's traffic is predicted to be.</p> <p>7.0 Conclusion</p> <p>7.1 The Jersey Farm proposal for the CBC Local Plan is for an employment site comprising a mix of office, light industry, and warehousing/distribution land-uses in buildings of various sizes, as an extension to the existing Manor Royal employment zone.</p> <p>7.2 For the purposes of this traffic assessment, the proposed Jersey Farm development is assumed to not exceed the following quanta: -</p> <ul style="list-style-type: none"> • 48,150sqm Warehousing. • 4,070sqm Industrial uses. <p>7.3 This Technical Note demonstrates that the Jersey Farm site is in a highly sustainable location within an existing employment district, with excellent opportunities for employees and visitors to travel on foot, cycle, and bus, and with purpose-built roads which connect to the principal and strategic road network.</p> <p>7.4 The Jersey Farm site offers safeguarded land for the future provision of the CWMMTL and its adjoining bus, foot, and cycle routes.</p> <p>7.5 It is demonstrated that Jersey Farm can be accessed via a new simple left-in-left-out junction on the A23 London Road.</p> <p>7.6 Following consultation with the local highway authority, WSCC, and using forecast traffic flow data from CBC's own strategic traffic modelling, this Technical Note demonstrates that the off-site traffic impact at the two closest roundabout junctions can be mitigated by relatively straightforward capacity-improvement schemes which are effective, safe, deliverable, and viable.</p> <p>7.7 It is noted that there are clearly concerns and issues regarding the Gatwick Green freight traffic using the local roads and lanes, and with Gatwick Green traffic generally on the surrounding road network.</p> <p>7.8 It is therefore concluded that in traffic and transport terms, Jersey Farm offers a realistic, viable, and deliverable employment site which should be considered as CBC's Local Plan strategic employment site in preference to the Gatwick Green site.</p>

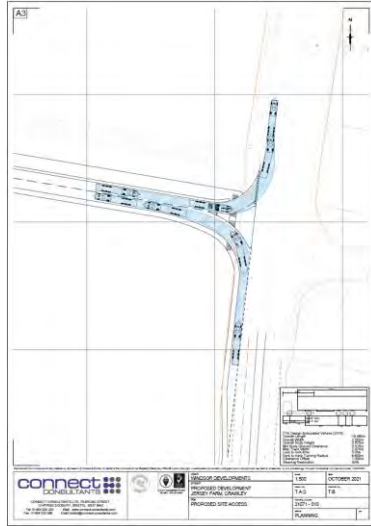
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Appendix 1: Initial Indicative Masterplan



Appendix 2: Proposed Jersey Farm Access Junction



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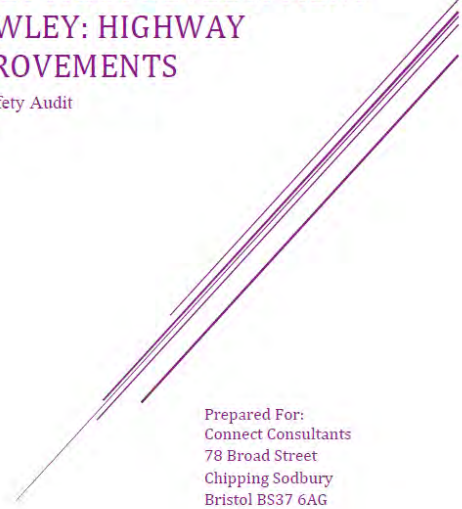
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Appendix 3: RSA Report and designer's response

Report Number: Connect/1260
 Date: 4th October 2021
 Prepared by: Julian Bartlett



**JERSEY FARM DEVELOPMENT
 CRAWLEY: HIGHWAY
 IMPROVEMENTS**
 Road Safety Audit
 Stage 1



Prepared For:
 Connect Consultants
 78 Broad Street
 Chipping Sodbury
 Bristol BS37 6AG

Jersey Farm Development, Crawley
 Highway Infrastructure
 Road Safety Audit Stage 1





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Job Number: 1260
 Client: Connect Consultants
 Highway Authority: Surrey County Council
 Project: Jersey Farm Development, Highway Improvements
 Report Title: Stage 1 Road Safety Audit
 Date: 4th October 2021

Issue	Purpose / Status	Prepared By	Checked	Approved	Date
D1	DRAFT	Julian Bartlett	Lyn Jones	Julian Bartlett	October 2021
D2	Minor Typos	Julian Bartlett	Lyn Jones	Julian Bartlett	October 2021

J Bartlett Consulting Ltd has prepared this report in accordance with the instructions of the above named Client for their sole and specific use. Any other persons who may use the information contained herein do so at their own risk.

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Ref. No.	Respondent	Policy/ Para	Comments																				
			<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>Jersey Farm Development, Crawley Highway Infrastructure Road Safety Audit Stage 1</p>  <p>CONTENTS</p> <p>1 Introduction.....2 2 Issues Raised By The Stage 1 Road Safety Audit.....5 3 Issues Outside The Scope Of This Road Safety Audit.....10 4 Audit Team Statement.....11 5 Audit Location Plan.....12</p> </div> <div style="width: 45%;"> <p>Jersey Farm Development, Crawley Highway Infrastructure Road Safety Audit Stage 1</p>  <p>1 INTRODUCTION</p> <p>1.1 This report results from a Stage 1 Road Safety Audit undertaken by J Bartlett Consulting Limited following a request from Tim Britton of Connect Consultants. The Audit was carried out during October 2021. It should be noted that the effects of the coronavirus pandemic on traffic movements may still be evident however best advice is that traffic movements are returning to pre-covid levels.</p> <p>1.2 This Safety Audit considers the introduction of a series of improvements to the Lowfield Heath Roundabout, Fleming Way Roundabout and left in left out junction to serve the development.</p> <p>1.3 The audit team comprised the following individuals:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 60%;">Julian Bartlett</td> <td style="width: 40%;">Road Safety Audit Team Leader</td> </tr> <tr> <td>BEng FCIHT FSoRSA</td> <td></td> </tr> <tr> <td>Lyn Jones</td> <td>Road Safety Audit Team Member</td> </tr> <tr> <td>HNC MCIHT MSoRSA</td> <td></td> </tr> </table> <p>Both Julian Bartlett and Lyn Jones hold a Highways England Certificate of Competency in Road Safety Audit gained through the education route.</p> <p>1.4 The following documents and drawings were made available to the Audit Team for this safety audit.</p> <p>Drawings</p> <table style="width: 100%; border: none;"> <thead> <tr> <th style="text-align: left;">Drawing Number</th> <th style="text-align: left;">Rev</th> <th style="text-align: left;">Title</th> </tr> </thead> <tbody> <tr> <td>21071 SK210923.2</td> <td>-</td> <td>Proposed Site Access</td> </tr> <tr> <td>21071 SK210831.1</td> <td>-</td> <td>Fleming Way Roundabout Proposed Improvements</td> </tr> <tr> <td>21071 SK210923.1</td> <td>-</td> <td>Lowfield Heath Roundabout Proposed Improvements</td> </tr> </tbody> </table> <p>Documents</p> <p>Jersey Farm Strategic Employment Site, Crawley: CBC LP3 + Jersey Farm Left-In-Left-Out 0390-RDJWL-ZZ-XX-DR-A-0050: Proposed Masterplan</p> <p>Departures, None Notified.</p> <p style="text-align: center; font-size: small;">Specialists in Road Safety, Traffic and Transportation Engineering; Quality, Environment Health & Safety Management Systems</p> <p style="text-align: center;">2</p> </div> </div>	Julian Bartlett	Road Safety Audit Team Leader	BEng FCIHT FSoRSA		Lyn Jones	Road Safety Audit Team Member	HNC MCIHT MSoRSA		Drawing Number	Rev	Title	21071 SK210923.2	-	Proposed Site Access	21071 SK210831.1	-	Fleming Way Roundabout Proposed Improvements	21071 SK210923.1	-	Lowfield Heath Roundabout Proposed Improvements
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			<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>Jersey Farm Development, Crawley Highway Infrastructure Road Safety Audit Stage 1</p> <p style="text-align: right;">JBartlett Consulting Ltd <small>UK Company Number 5270647</small></p> </div> <div style="width: 45%;"> <p>Jersey Farm Development, Crawley Highway Infrastructure Road Safety Audit Stage 1</p> <p style="text-align: right;">JBartlett Consulting Ltd <small>UK Company Number 5270647</small></p> </div> </div> <p>1.5 A site visit was undertaken by the Audit Team on 4th October 2021 between 10:30 and 11:45. It was fine but overcast and the road surface was drying during the site visit. Traffic movements were as expected at the time of the site visit with free movements in both directions on the A23. One motorcycle was seen, no pedal cyclist and two pedestrians using footway opposite the development site. While unable to verify the observation it appeared that vehicles speeds were relatively high with hard acceleration into the derestricted limit. It has been assumed that these movements may not be typical for the area and that more realistic movements have been accounted for under the traffic modelling undertake for the scheme. See also paragraphs 1.1</p> <p>1.6 The scheme has been examined and this report compiled only regarding the safety implications for road users of the scheme as presented. It has not been examined or verified for compliance with any other Standards or criteria. However, to clearly explain a safety problem or the recommendation to resolve a problem, the Audit Team may on occasion have referred to a design standard for information only. Any audit comments should not be construed as implying that a technical audit has been undertaken in any respect.</p> <p>1.7 The terms of reference for the audit are as described in the Highways England Design Manual for Roads and Bridges (DMRB), Volume 5, Section 2, GG119 (2020) 'Road Safety Audit'. The audit has also been undertaken in light of the philosophy outlined in the CIHT 'Road Safety Guidelines' 2020 Edition.</p> <p>1.8 The Audit Team have referred to appropriate design documentation as required while undertaking this audit. Reference texts include but are not limited to</p> <ul style="list-style-type: none"> • Design Manual For Roads And Bridges (DMRB); • Manual For Streets; • Manual For Streets 2; • Highway Construction Details; • Specification For Highway Works; • Traffic Signs Manual Chapter 6; • Traffic Signs Regulations and General Directions (TSRDG) <p>1.9 Any recommendations included within this report should not be regarded as being prescriptive design solutions to the problems raised. They are intended only to indicate a proportionate and viable means of eliminating or mitigating the identified problem, in accordance with GG 119 (2020), and in no way, imply that a formal design process has been undertaken. There may be alternative methods of addressing a problem which would be equally acceptable in achieving the desired elimination or mitigation and these should be considered when responding to this report.</p> <div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div style="width: 45%; text-align: center;"> <p>Specialists in Road Safety, Traffic and Transportation Engineering; Quality, Environment Health & Safety Management Systems</p> <p>3</p> </div> <div style="width: 45%; text-align: center;"> <p>Specialists in Road Safety, Traffic and Transportation Engineering; Quality, Environment Health & Safety Management Systems</p> <p>4</p> </div> </div>

2 ISSUES RAISED BY THE STAGE 1 ROAD SAFETY AUDIT

2.1 Problems in this Audit will be identified linearly and by drawing number

Drg: 21071 SK210923.2 Rev -

2.2 After due and careful consideration, the audit team have been unable to identify any areas of concern regarding highway road safety associated with the information provided on this drawing.

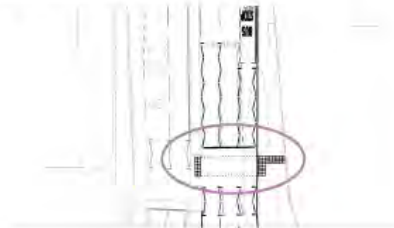
Drg: 21071 SK210831.1 Rev -

2.3 Problem 1

Location: Fleming Way Roundabout: Southbound approach to controlled pedestrian crossing

Summary: High sided vehicles (including buses) blocking forward visibility of nearside and offside signal heads

There is the potential for the drivers of vehicles approaching the crossing to be unaware of the signal operation should a high sided vehicle be located to either side in lanes 1 and 3. This in turn could result in failure to conform and an increased risk of collision with users of the crossing



Recommendation

It is recommended that as part of the detailed design secondary signal poles are located such that signal heads can be viewed from all lanes, the use of double height signal heads may also be beneficial

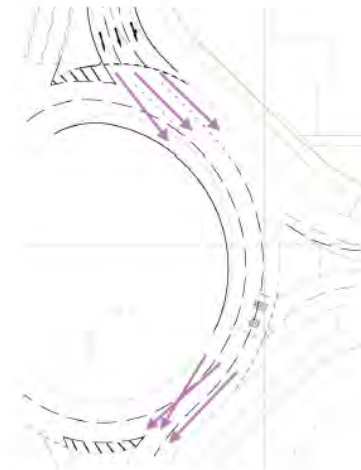
2.4 Problem 2

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Location: Fleming Way Roundabout: Southbound approach to roundabout give way

Summary: The approach is marked for three lanes to travel straight ahead with lane 1 also being marked for left turn whereas the straight ahead exit lane only allows for two lane exit

There is the potential for drivers seeking to travel north to south through the roundabout to choose any of the three approach lanes to undertake the desired manoeuvre as indicated by the lane markings. Realistically lane 3 continues round the circulatory carriageway rather than allowing the movement identified to occur leading to the potential for inappropriate lane changing and an increased risk of side impact collisions on the circulatory carriageway



Recommendation

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It is recommended that the arrows on the approach to the give way from the north are supplemented with route destination marking in the form of route designation numbers and directional signing is provided to provide appropriate driver information in terms of lane choice for destinations. Lane 1 should be marked for left turn only. There appears to be sufficient space within the circulatory carriageway to allow for lane widths to be adjusted and spiral markings introduced which would guide drivers to appropriate exit points.

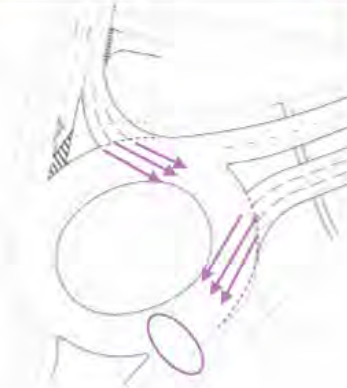
Drng: 21071 SK210923.1 Rev -

2.5 Problem 3

Location: Lowfield Heath Roundabout: Southbound and Westbound approaches to roundabout give way

Summary: The approaches are marked for three lanes entry to the circulatory carriageway whereas the exit lanes only allows for two lane exit

Similarly, to Fleming Way Roundabout the entry arms indicated are marked into three lanes whereas exits are two lane only. This leads to driver confusion as to appropriate lane selection and as such increased the potential for side impact type collisions on the circulatory carriageway as drivers seek to take the desired exit. In this case the circulatory carriageway is not marked which is likely to exacerbate the confusion and increase potential for collisions



Recommendation

It is recommended that arrows and route destination marking in the form of route designation numbers and directional signing are provided for all approaches. Lane 1 for each approach being marked for left turn only. Similarly, to Fleming Way Roundabout there appears to be sufficient space within the circulatory carriageway to allow for lane widths to be adjusted and spiral markings introduced which would guide drivers to appropriate exit points.

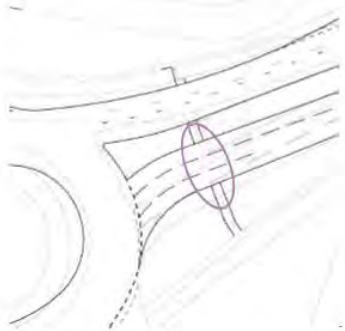
2.6 Problem 4




Location: Lowfield Heath Roundabout: Westbound uncontrolled crossing

Summary: Through carriageway widened to three lanes making pedestrian crossing distances unsustainable.

The proposals lead to the widening of the west bound approach to the roundabout to three lanes at the uncontrolled pedestrian crossing point. It is virtually impossible for pedestrians, particularly the elderly, young and disabled to cross three lanes of live traffic in a safe manner. If pedestrians seek to cross between stationary or slow-moving traffic driver visibility of the crossing movement and also pedestrian visibility

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Ref. No.	Respondent	Policy/ Para	Comments
			<p data-bbox="689 288 891 339">Jersey Farm Development, Crawley Highway Infrastructure Road Safety Audit Stage 1</p> <p data-bbox="1111 284 1245 339">JB Bartlett Consulting Ltd <small>UK Company Number 5270147</small></p> <p data-bbox="719 347 1234 384">of the oncoming vehicles is compromised leading to an increased risk of vehicle pedestrian collisions</p>  <p data-bbox="719 759 1234 823">Recommendation It is recommended that either the crossing location is removed, and pedestrians directed to the other side of the roundabout where maximum crossing distances are over two lanes or that a signal-controlled pedestrian crossing is provided.</p> <p data-bbox="775 1098 1144 1134">Specialists in Road Safety, Traffic and Transportation Engineering; Quality, Environment Health & Safety Management Systems</p> <p data-bbox="954 1129 965 1142">9</p>

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			<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>Jersey Farm Development, Crawley Highway Infrastructure Road Safety Audit Stage 1</p> <hr/> <p>3 ISSUES OUTSIDE THE SCOPE OF THIS ROAD SAFETY AUDIT</p> <p>3.1 No further issues were identified</p> </div> <div style="width: 45%; text-align: right;">  <p>Jersey Farm Development, Crawley Highway Infrastructure Road Safety Audit Stage 1</p> <hr/> <p>4 AUDIT TEAM STATEMENT</p> <p>We certify that this Audit has been carried out adopting the principles contained in the Highways England standard GG 119 'Road Safety Audits' and in line with the philosophy outlined in the CIHT 'Road Safety Guidelines' 2020 Edition.</p> <p>Road Safety Audit Team Leader</p> <p>Name: Julian Bartlett</p> <p>Signed: </p> <p>Position: Director</p> <p>Organisation: J Bartlett Consulting Ltd</p> <p>Date: 14th October 2021</p> <p>Road Safety Audit Team Member</p> <p>Name: Lyn Jones</p> <p>Signed: </p> <p>Position: Associate</p> <p>Organisation: J Bartlett Consulting Ltd</p> <p>Date: 14th October 2021</p> <p>Contact Details as per record sheet</p> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div style="width: 45%; text-align: center;"> <p>Specialists in Road Safety, Traffic and Transportation Engineering; Quality, Environment Health & Safety Management Systems</p> <p>10</p> </div> <div style="width: 45%; text-align: center;"> <p>Specialists in Road Safety, Traffic and Transportation Engineering; Quality, Environment Health & Safety Management Systems</p> <p>11</p> </div> </div>

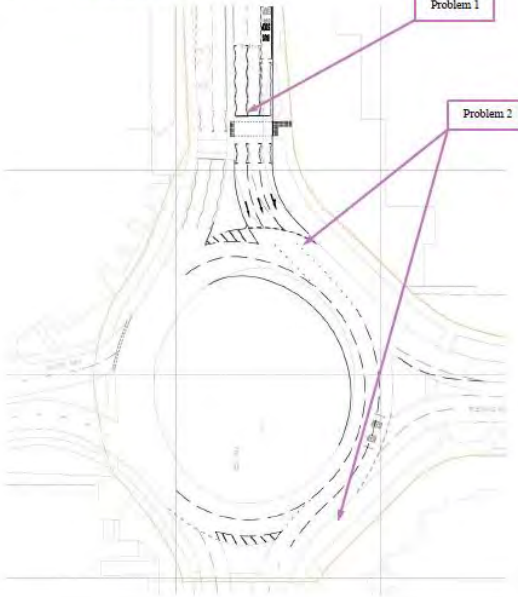
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Road Safety Audit Stage 1

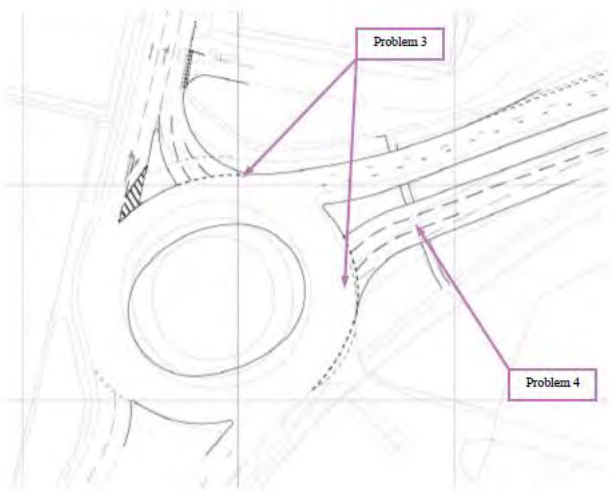


5 AUDIT LOCATION PLAN





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			<div data-bbox="1182 293 1352 328" style="text-align: right;">  </div> <p data-bbox="692 339 898 357">Road Safety Audit Response Report</p> <p data-bbox="692 379 786 394">F1 - Project details</p> <p data-bbox="692 400 790 413">Table F.1 Project details</p> <table border="1" data-bbox="692 410 1352 494"> <tr> <td>Report title:</td> <td>Jersey Farm Development, Crawley: Highway Improvements, Road Safety Audit Stage 1</td> </tr> <tr> <td>Date:</td> <td>4th October 2021</td> </tr> <tr> <td>Document reference and revision:</td> <td>21071-RSARR-Jersey Farm A23 - 20211015</td> </tr> <tr> <td>Prepared by:</td> <td>Tim Britton</td> </tr> <tr> <td>On behalf of:</td> <td>Connect Consultants</td> </tr> </table> <p data-bbox="692 517 813 531">Table F.2 Authorisation sheet</p> <table border="1" data-bbox="692 529 1352 762"> <tr> <td>Project:</td> <td>21071 – Jersey Farm, Crawley</td> </tr> <tr> <td>Report title:</td> <td>Jersey Farm Development, Crawley: Highway Improvements – RSA1 Response Report</td> </tr> <tr> <td>Prepared by:</td> <td></td> </tr> <tr> <td>Name:</td> <td>Tim Britton</td> </tr> <tr> <td>Position:</td> <td>Associate Transport Planner</td> </tr> <tr> <td>Signed:</td> <td></td> </tr> <tr> <td>Organisation:</td> <td>Connect Consultants Ltd</td> </tr> <tr> <td>Date:</td> <td>15th October 2021</td> </tr> <tr> <td>Approved by:</td> <td></td> </tr> <tr> <td>Name:</td> <td>Tim Britton</td> </tr> <tr> <td>Position:</td> <td>Associate Transport Planner</td> </tr> <tr> <td>Signed:</td> <td></td> </tr> <tr> <td>Organisation:</td> <td>Connect Consultants Ltd</td> </tr> <tr> <td>Date:</td> <td>15th October 2021</td> </tr> </table> <p data-bbox="1021 783 1030 796" style="text-align: center;">1</p> <div data-bbox="1182 818 1352 853" style="text-align: right;">  </div> <p data-bbox="692 863 779 877">F2 - Introduction</p> <p data-bbox="692 882 1352 920">This response report is relating to the proposed development of a mixed-use employment site at Jersey Farm, Crawley. The proposals include a new left-in-left-out junction on the A23 London Road, and highway capacity improvement works on the A23 Fleming Way roundabout and the A23 Lowfield Heath roundabout. This report is in response to the RSA Stage 1, completed by J Bartlett Consulting Ltd dated 4th October 2021. The J Bartlett Consulting report reference number is Connect/1260.</p> <p data-bbox="692 922 1005 936">This RSA response report was written by Tim Britton of Connect Consultants Ltd.</p> <p data-bbox="692 963 790 978">F3 - Key personnel</p> <p data-bbox="692 983 790 997">Table F.3 Key personnel</p> <table border="1" data-bbox="692 994 1352 1066"> <tr> <td>Overseeing Organisation:</td> <td>West Sussex County Council</td> </tr> <tr> <td>RSA team:</td> <td>Julian Bartlett BEng MCHT FSoRSA, Audit Team Leader, J Bartlett Consulting Ltd Lyn Jones HNC MCHT MSoRSA, Audit Team Member, J Bartlett Consulting Ltd</td> </tr> <tr> <td>Design organisation:</td> <td>Tim Britton, Associate Transport Planner, Connect Consultants Ltd</td> </tr> </table> <p data-bbox="1021 1299 1030 1311" style="text-align: center;">2</p>	Report title:	Jersey Farm Development, Crawley: Highway Improvements, Road Safety Audit Stage 1	Date:	4 th October 2021	Document reference and revision:	21071-RSARR-Jersey Farm A23 - 20211015	Prepared by:	Tim Britton	On behalf of:	Connect Consultants	Project:	21071 – Jersey Farm, Crawley	Report title:	Jersey Farm Development, Crawley: Highway Improvements – RSA1 Response Report	Prepared by:		Name:	Tim Britton	Position:	Associate Transport Planner	Signed:		Organisation:	Connect Consultants Ltd	Date:	15 th October 2021	Approved by:		Name:	Tim Britton	Position:	Associate Transport Planner	Signed:		Organisation:	Connect Consultants Ltd	Date:	15 th October 2021	Overseeing Organisation:	West Sussex County Council	RSA team:	Julian Bartlett BEng MCHT FSoRSA, Audit Team Leader, J Bartlett Consulting Ltd Lyn Jones HNC MCHT MSoRSA, Audit Team Member, J Bartlett Consulting Ltd	Design organisation:	Tim Britton, Associate Transport Planner, Connect Consultants Ltd
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F4 - Road safety audit decision log
 The RSA report identifies four problems and offers recommendations to resolve them.
 Table F.4 Road safety audit decision log

RSA problem	RSA recommendation	Design organisation response	Overseeing Organisation response	Agreed RSA action
21071 SK210923.2 - Proposed Site Access 2.2 After due and careful consideration, the audit team have been unable to identify any areas of concern regarding highway road safety associated with the information provided on this drawing	None.	The RSA was undertaken based on Connect sketch drawing 21071 SK210923.2. As the RSA found no problems, the scheme drawing has been finalised as drawing 21071 - 010.		Scheme drawing finalised as drawing 21071 - 010.
21071 SK210831.1 - Fleming Way Roundabout 2.3 Problem 1 There is the potential for the drivers of vehicles approaching the crossing to be unaware of the signal operation should a high sided vehicle be located to either side in lanes 1 and 3. This in turn could result in failure to conform and an increased risk of collision with users of the crossing	It is recommended that as part of the detailed design secondary signal poles are located such that signal heads can be viewed from all lanes, the use of double height signal heads may also be beneficial	Drawing will be updated to show location of new secondary signal heads mounted on double height poles.		Scheme drawing to be updated and finalised as drawing 21071 - 011.



RSA problem	RSA recommendation	Design organisation response	Overseeing Organisation response	Agreed RSA action
21071 SK210831.1 - Fleming Way Roundabout 2.4 Problem 2 Southbound approach to roundabout give way. There is the potential for drivers seeking to travel north to south through the roundabout to choose any of the three approach lanes to undertake the desired manoeuvre as indicated by the lane markings. Realistically lane 3 continues round the circulatory carriageway rather than allowing the movement identified to occur leading to the potential for inappropriate lane changing and an increased risk of side impact collisions on the circulatory carriageway.	It is recommended that the arrows on the approach to the give way from the north are supplemented with route destination marking in the form of route designation numbers and directional signing is provided to provide appropriate driver information in terms of lane choice for destinations. Lane 1 should be marked for left turn only. There appears to be sufficient space within the circulatory carriageway to allow for lane widths to be adjusted and spiral markings introduced which would guide drivers to appropriate exit points.	Lane markings will be supplemented with route destinations as suggested, however, the predominant traffic flow on this approach is straight ahead to the A23 south, so the left lane will be marked for both left and ahead, which means there is no need for spiral lane markings on the circulatory carriageway.		Scheme drawing to be updated and finalised as drawing 21071 - 011.
21071 SK210923.1 - Lowfield Heath Roundabout 2.5 Problem 3 Southbound and Westbound approaches to roundabout give way. Similarly, to Fleming Way Roundabout the entry arms indicated are marked into three lanes whereas exits are two lane only. This leads to	It is recommended that arrows and route destination marking in the form of route designation numbers and directional signing are provided for all approaches. Lane 1 for each approach being marked for left turn only. Similarly, to Fleming Way Roundabout there appears to	Lane markings will be supplemented with arrows and route destination markings as suggested, and spiral lane markings will be shown on the circulatory carriageway.		Scheme drawing to be updated and finalised as drawing 21071 - 012.

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RSA problem	RSA recommendation	Design organisation response	Overseeing Organisation response	Agreed RSA action
driver confusion as to appropriate lane selection and as such increased the potential for side impact type collisions on the circulatory carriageway as drivers seek to take the desired exit. In this case the circulatory carriageway is not marked which is likely to exacerbate the confusion and increase potential for collisions.	be sufficient space within the circulatory carriageway to allow for lane widths to be adjusted and spiral markings introduced which would guide drivers to appropriate exit points			
21071 HK21028.1 – Lowfield Heath roundabout. 2.6 Problem 4 Westbound uncontrolled crossing. The proposal to the widening of the west bound approach to the roundabout to three lanes at the uncontrolled pedestrian crossing point. It is virtually impossible for pedestrians, particularly the elderly, young and disabled to cross three lanes of live traffic in a safe manner. If pedestrians seek to cross between stationary or slow-moving traffic driver visibility of the crossing movement and also pedestrian visibility of the	It is recommended that either the crossing location is removed, and pedestrians directed to the other side of the roundabout where maximum crossing distances are over two lanes or that a signal controlled pedestrian crossing is provided.	The crossing location will be removed, and relocated on the southern arm of the junction as suggested.		Scheme drawing to be updated and finalised as drawing 21071 - 012.

5



RSA problem	RSA recommendation	Design organisation response	Overseeing Organisation response	Agreed RSA action
oncoming vehicles is compromised leading to an increased risk of vehicle pedestrian collisions.				

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F5 - Design organisation and Overseeing Organisation statements

Table F.5 Overseeing Organisation Statement

On behalf of the Overseeing Organisation, I certify that:

- 1) the RSA actions identified in response to the road safety audit problems in this road safety audit have been discussed and agreed with the Overseeing Organisation, and
- 2) the agreed RSA actions will be progressed.

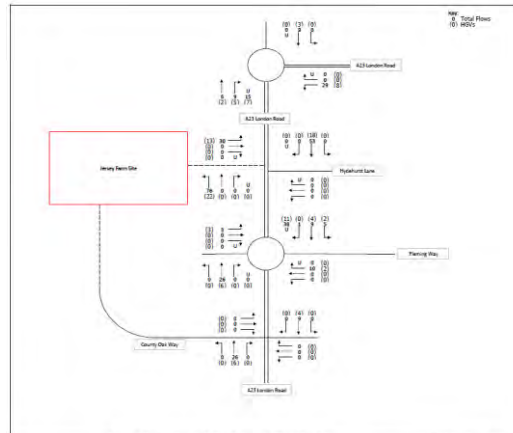
Name:	
Signed:	
Position:	
Organisation:	
Date:	

Table F.6 Design Organisation Statement

On behalf of the Design Organisation, I certify that the RSA actions identified in response to the road safety audit problems in this road safety audit have been discussed and agreed with the Overseeing Organisation.

Name:	Tim Britton
Signed:	Tim Britton
Position:	Associate Transport Planner
Organisation:	Connect Consultants Ltd
Date:	15 th October 2021

Appendix 4: Jersey Farm Traffic Distribution



Jersey Farm Strategic Employment Site, Crawley
 Jersey Farm Development Traffic (left-in-left-out access)



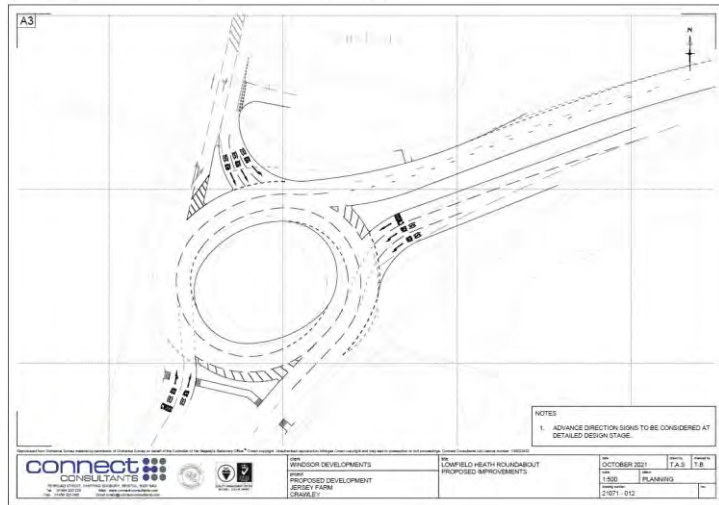
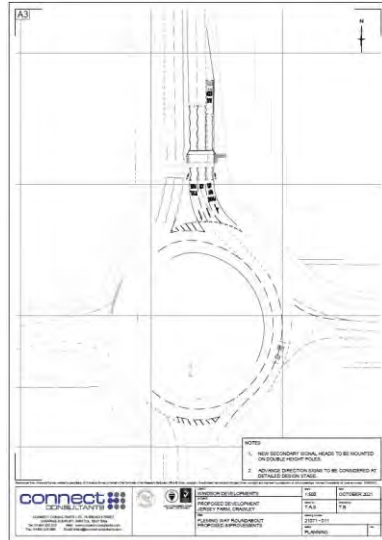
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			<p>Fleming Way Roundabout ABCADY Modelling Summary Results</p> <table border="1"> <thead> <tr> <th colspan="7">No Jersey Farm</th> </tr> <tr> <th rowspan="2"></th> <th colspan="3">AM</th> <th colspan="3">PM</th> </tr> <tr> <th>Queue (Veh)</th> <th>Delay (s)</th> <th>RFC</th> <th>Queue (Veh)</th> <th>Delay (s)</th> <th>RFC</th> </tr> </thead> <tbody> <tr> <td colspan="7">CBC LP1</td> </tr> <tr> <td>Arm A23 N</td> <td>16.6</td> <td>36.73</td> <td>0.56</td> <td>2.3</td> <td>6.42</td> <td>0.7</td> </tr> <tr> <td>Arm Fleming</td> <td>1.1</td> <td>3.89</td> <td>0.53</td> <td>0.9</td> <td>3.25</td> <td>0.47</td> </tr> <tr> <td>Arm A23 S</td> <td>1.5</td> <td>4.63</td> <td>0.6</td> <td>1.2</td> <td>4</td> <td>0.54</td> </tr> <tr> <td>Arm Betts</td> <td>0.2</td> <td>3.5</td> <td>0.13</td> <td>0.8</td> <td>5.17</td> <td>0.44</td> </tr> <tr> <td colspan="7">CBC LP1 with Sust Mit</td> </tr> <tr> <td>Arm A23 N</td> <td>21.2</td> <td>46.38</td> <td>0.58</td> <td>2.3</td> <td>6.36</td> <td>0.7</td> </tr> <tr> <td>Arm Fleming</td> <td>1.2</td> <td>4.41</td> <td>0.55</td> <td>0.6</td> <td>5.21</td> <td>0.46</td> </tr> <tr> <td>Arm A23 S</td> <td>1.5</td> <td>4.62</td> <td>0.6</td> <td>1.1</td> <td>3.87</td> <td>0.53</td> </tr> <tr> <td>Arm Betts</td> <td>0.3</td> <td>3.85</td> <td>0.23</td> <td>0.7</td> <td>4.9</td> <td>0.42</td> </tr> <tr> <td colspan="7">CBC LPS</td> </tr> <tr> <td>Arm A23 N</td> <td>57.1</td> <td>100.14</td> <td>1.65</td> <td>4</td> <td>9.65</td> <td>0.8</td> </tr> <tr> <td>Arm Fleming</td> <td>1.3</td> <td>6.63</td> <td>0.56</td> <td>0.8</td> <td>3.64</td> <td>0.46</td> </tr> <tr> <td>Arm A23 S</td> <td>1.5</td> <td>4.4</td> <td>0.6</td> <td>1.3</td> <td>4.14</td> <td>0.56</td> </tr> <tr> <td>Arm Betts</td> <td>0.2</td> <td>3.31</td> <td>0.14</td> <td>0.8</td> <td>5.26</td> <td>0.44</td> </tr> <tr> <td colspan="7">CBC LPS with Sust Mit</td> </tr> <tr> <td>Arm A23 N</td> <td>66.1</td> <td>115.93</td> <td>1.66</td> <td>3.4</td> <td>8.55</td> <td>0.78</td> </tr> <tr> <td>Arm Fleming</td> <td>1.4</td> <td>7.38</td> <td>0.59</td> <td>0.8</td> <td>5.41</td> <td>0.45</td> </tr> <tr> <td>Arm A23 S</td> <td>1.5</td> <td>4.96</td> <td>0.6</td> <td>1.2</td> <td>3.97</td> <td>0.55</td> </tr> <tr> <td>Arm Betts</td> <td>0.3</td> <td>3.88</td> <td>0.24</td> <td>0.7</td> <td>5.04</td> <td>0.42</td> </tr> <tr> <td colspan="7">CBC LPS with CWLR</td> </tr> <tr> <td>Arm A23 N</td> <td>123.6</td> <td>201.11</td> <td>1.13</td> <td>5</td> <td>11.47</td> <td>0.84</td> </tr> <tr> <td>Arm Fleming</td> <td>1.5</td> <td>6.81</td> <td>0.6</td> <td>3.7</td> <td>14.1</td> <td>0.8</td> </tr> <tr> <td>Arm A23 S</td> <td>1.6</td> <td>4.81</td> <td>0.61</td> <td>2</td> <td>4.43</td> <td>0.67</td> </tr> <tr> <td>Arm Betts</td> <td>0.3</td> <td>4.06</td> <td>0.25</td> <td>1.1</td> <td>8.3</td> <td>0.53</td> </tr> <tr> <td colspan="7">CBC LPS with CWLR with Sust Mit</td> </tr> <tr> <td>Arm A23 N</td> <td>118.8</td> <td>194.28</td> <td>1.12</td> <td>3.2</td> <td>7.81</td> <td>0.76</td> </tr> <tr> <td>Arm Fleming</td> <td>1.4</td> <td>6.55</td> <td>0.59</td> <td>2.3</td> <td>9.31</td> <td>0.7</td> </tr> <tr> <td>Arm A23 S</td> <td>1.6</td> <td>4.79</td> <td>0.61</td> <td>1.7</td> <td>5.54</td> <td>0.63</td> </tr> <tr> <td>Arm Betts</td> <td>0.3</td> <td>3.92</td> <td>0.24</td> <td>0.9</td> <td>6.82</td> <td>0.47</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="7">With Jersey Farm with Lilo access</th> </tr> <tr> <th rowspan="2"></th> <th colspan="3">AM</th> <th colspan="3">PM</th> </tr> <tr> <th>Queue (Veh)</th> <th>Delay (s)</th> <th>RFC</th> <th>Queue (Veh)</th> <th>Delay (s)</th> <th>RFC</th> </tr> </thead> <tbody> <tr> <td colspan="7">Existing layout - 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CBC LPS + JF Lilo</td> </tr> <tr> <td>Arm A23 N</td> <td>85.9</td> <td>142.28</td> <td>1.68</td> <td>4.5</td> <td>10.8</td> <td>0.82</td> </tr> <tr> <td>Arm Fleming</td> <td>1.4</td> <td>6.97</td> <td>0.58</td> <td>0.9</td> <td>5.84</td> <td>0.46</td> </tr> <tr> <td>Arm A23 S</td> <td>1.7</td> <td>5.68</td> <td>0.63</td> <td>1.3</td> <td>4.2</td> <td>0.57</td> </tr> <tr> <td>Arm Betts</td> <td>0.2</td> <td>3.78</td> <td>0.15</td> <td>0.8</td> <td>5.35</td> <td>0.44</td> </tr> <tr> <td colspan="7">Existing layout - CBC LPS with Sust Mit + JF Lilo</td> </tr> <tr> <td>Arm A23 N</td> <td>101.8</td> <td>178.79</td> <td>1.11</td> <td>3.9</td> <td>9.5</td> <td>0.8</td> </tr> <tr> <td>Arm Fleming</td> <td>1.5</td> <td>7.79</td> <td>0.61</td> <td>0.8</td> <td>5.6</td> <td>0.45</td> </tr> <tr> <td>Arm A23 S</td> <td>1.7</td> <td>5.03</td> <td>0.62</td> <td>1.2</td> <td>4.11</td> <td>0.56</td> </tr> <tr> <td>Arm Betts</td> <td>0.3</td> <td>4.19</td> <td>0.25</td> <td>0.8</td> <td>5.16</td> <td>0.43</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="7">With Jersey Farm with Lilo access - 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CBC LPS + JF Lilo</td> </tr> <tr> <td>Arm A23 N</td> <td>3.6</td> <td>6.91</td> <td>0.75</td> <td>1.5</td> <td>3.5</td> <td>0.6</td> </tr> <tr> <td>Arm Fleming</td> <td>1.6</td> <td>8.03</td> <td>0.62</td> <td>0.9</td> <td>5.84</td> <td>0.46</td> </tr> <tr> <td>Arm A23 S</td> <td>1.7</td> <td>5.14</td> <td>0.64</td> <td>1.3</td> <td>4.2</td> <td>0.57</td> </tr> <tr> <td>Arm Betts</td> <td>0.2</td> <td>3.79</td> <td>0.15</td> <td>0.8</td> <td>5.35</td> <td>0.44</td> </tr> <tr> <td colspan="7">Improved layout - CBC LPS with Sust Mit + JF Lilo</td> </tr> <tr> <td>Arm A23 N</td> <td>3.9</td> <td>7.57</td> <td>0.8</td> <td>1.4</td> <td>3.35</td> <td>0.58</td> </tr> <tr> <td>Arm Fleming</td> <td>1.8</td> <td>9.52</td> <td>0.65</td> <td>0.8</td> <td>5.61</td> <td>0.45</td> </tr> <tr> <td>Arm A23 S</td> <td>1.7</td> <td>5.09</td> <td>0.63</td> <td>1.2</td> <td>4.11</td> <td>0.56</td> </tr> <tr> <td>Arm Betts</td> <td>0.3</td> <td>4.2</td> <td>0.25</td> <td>0.8</td> <td>5.16</td> <td>0.43</td> </tr> </tbody> </table>	No Jersey Farm								AM			PM			Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC	CBC LP1							Arm A23 N	16.6	36.73	0.56	2.3	6.42	0.7	Arm Fleming	1.1	3.89	0.53	0.9	3.25	0.47	Arm A23 S	1.5	4.63	0.6	1.2	4	0.54	Arm Betts	0.2	3.5	0.13	0.8	5.17	0.44	CBC LP1 with Sust Mit							Arm A23 N	21.2	46.38	0.58	2.3	6.36	0.7	Arm Fleming	1.2	4.41	0.55	0.6	5.21	0.46	Arm A23 S	1.5	4.62	0.6	1.1	3.87	0.53	Arm Betts	0.3	3.85	0.23	0.7	4.9	0.42	CBC LPS							Arm A23 N	57.1	100.14	1.65	4	9.65	0.8	Arm Fleming	1.3	6.63	0.56	0.8	3.64	0.46	Arm A23 S	1.5	4.4	0.6	1.3	4.14	0.56	Arm Betts	0.2	3.31	0.14	0.8	5.26	0.44	CBC LPS with Sust Mit							Arm A23 N	66.1	115.93	1.66	3.4	8.55	0.78	Arm Fleming	1.4	7.38	0.59	0.8	5.41	0.45	Arm A23 S	1.5	4.96	0.6	1.2	3.97	0.55	Arm Betts	0.3	3.88	0.24	0.7	5.04	0.42	CBC LPS with CWLR							Arm A23 N	123.6	201.11	1.13	5	11.47	0.84	Arm Fleming	1.5	6.81	0.6	3.7	14.1	0.8	Arm A23 S	1.6	4.81	0.61	2	4.43	0.67	Arm Betts	0.3	4.06	0.25	1.1	8.3	0.53	CBC LPS with CWLR with Sust Mit							Arm A23 N	118.8	194.28	1.12	3.2	7.81	0.76	Arm Fleming	1.4	6.55	0.59	2.3	9.31	0.7	Arm A23 S	1.6	4.79	0.61	1.7	5.54	0.63	Arm Betts	0.3	3.92	0.24	0.9	6.82	0.47	With Jersey Farm with Lilo access								AM			PM			Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC	Existing layout - CBC LP1 + JF Lilo							Arm A23 N	25.3	55.05	1	2.6	7.14	0.73	Arm Fleming	1.2	6.36	0.56	0.9	5.56	0.49	Arm A23 S	1.7	5.14	0.63	1.2	4.07	0.55	Arm Betts	0.2	3.79	0.15	0.8	5.27	0.44	Existing layout - CBC LP1 with Sust Mit + JF Lilo							Arm A23 N	38.3	74.7	1.02	2.6	7.1	0.73	Arm Fleming	1.3	6.61	0.57	0.9	5.46	0.48	Arm A23 S	1.7	5.04	0.63	1.1	3.92	0.52	Arm Betts	0.3	4.15	0.24	0.7	4.97	0.42	Existing layout - CBC LPS + JF Lilo							Arm A23 N	85.9	142.28	1.68	4.5	10.8	0.82	Arm Fleming	1.4	6.97	0.58	0.9	5.84	0.46	Arm A23 S	1.7	5.68	0.63	1.3	4.2	0.57	Arm Betts	0.2	3.78	0.15	0.8	5.35	0.44	Existing layout - CBC LPS with Sust Mit + JF Lilo							Arm A23 N	101.8	178.79	1.11	3.9	9.5	0.8	Arm Fleming	1.5	7.79	0.61	0.8	5.6	0.45	Arm A23 S	1.7	5.03	0.62	1.2	4.11	0.56	Arm Betts	0.3	4.19	0.25	0.8	5.16	0.43	With Jersey Farm with Lilo access - Improved Layout 21071 - 011								AM			PM			Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC	Improved layout - CBC LP1 + JF Lilo							Arm A23 N	3.6	5.35	0.73	1.1	3.02	0.53	Arm Fleming	1.3	6.34	0.56	0.9	5.56	0.49	Arm A23 S	1.7	5.16	0.63	1.2	4.07	0.55	Arm Betts	0.2	3.79	0.15	0.8	5.27	0.44	Improved layout - CBC LP1 with Sust Mit + JF Lilo							Arm A23 N	2.8	5.73	0.74	1.1	3.01	0.53	Arm Fleming	1.4	7.23	0.58	0.9	5.46	0.48	Arm A23 S	1.7	5.06	0.63	1.1	3.92	0.52	Arm Betts	0.3	4.15	0.24	0.7	4.97	0.42	Improved layout - CBC LPS + JF Lilo							Arm A23 N	3.6	6.91	0.75	1.5	3.5	0.6	Arm Fleming	1.6	8.03	0.62	0.9	5.84	0.46	Arm A23 S	1.7	5.14	0.64	1.3	4.2	0.57	Arm Betts	0.2	3.79	0.15	0.8	5.35	0.44	Improved layout - CBC LPS with Sust Mit + JF Lilo							Arm A23 N	3.9	7.57	0.8	1.4	3.35	0.58	Arm Fleming	1.8	9.52	0.65	0.8	5.61	0.45	Arm A23 S	1.7	5.09	0.63	1.2	4.11	0.56	Arm Betts	0.3	4.2	0.25	0.8	5.16	0.43
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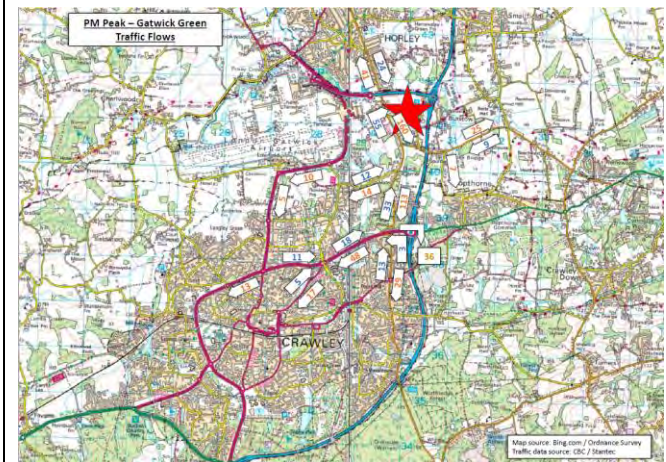
Appendix 6: Off-site Mitigation Schemes

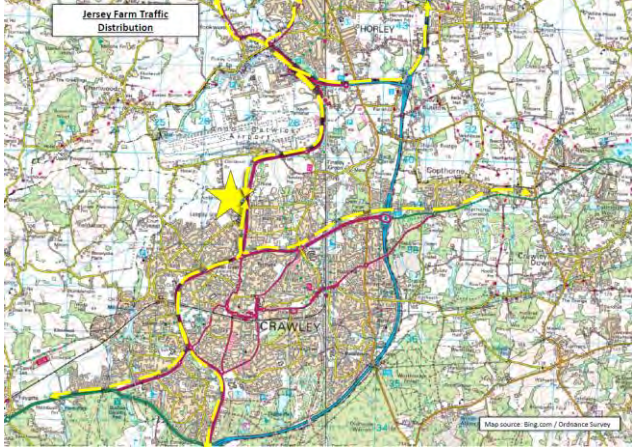


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Appendix 7: Traffic Flow Diagrams



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			 <p>Suggested Modifications: We therefore find the policy inconsistent with GAT2. In particular, for the reasons set out above, we consider that the GAT2 safeguarding area is unjustified in principle and in extent, as is too great. Further, the Council's rejection of other sites that fall within the safeguarding area, whilst simultaneously and inconsistently promoting (EC4) the removal of areas of safeguarded land for the Gatwick Green allocation and (ST4) conflicting alternative safeguarding for the western relief road is ineffective, unjustified, and contrary to national policy.</p>
REP/050 (2023)	Homes England	ST4	<p>Rowley Farm - GAT2: Safeguarded Land We continue to recognise the national policy drivers for the continued safeguarding area proposed for the potential southern runway of Gatwick Airport and support the progress made within the revised policy wording and evidence relating to the areas of search for the Crawley Western Multi-Modal Transport Link found within Policy ST4, with reference and support for the text of paragraph 17.29. The amendments made aligns with our previous recommendations made in the West of Ifield 2021 representations.</p> <p>Given the importance of the Western Multi-Modal Transport Link to address cumulative development impacts across Crawley and the wider area, the flexible approach at the eastern (A23) end of the proposed link that seeks to balance the risk of safeguarding conflict against the potential loss of employment land and ability to deliver the Western Multi-Modal Transport Link as a strategic transport link is supported. The supporting feasibility study shows alternative options that could be deployed in the event a southern runway does come forward which is considered a sound approach given the uncertainty around a southern runway at this time and the need for wider land use impacts to be considered as part of any runway proposal at that time.</p> <p>Suggested Modifications:</p>

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REP/050 (2023)	Homes England	GAT2 and ST4	<p>Conflict between Policy GAT2 (Gatwick safeguarding area) and Policy ST4 (Crawley Western Multi-Modal Transport Link) We continue to recognise the importance of the safeguarding area proposed for the potential southern runway of Gatwick Airport and support the progress made within the revised policy wording and evidence relating to the areas of search for the Crawley Western Multi-Modal Transport Link found within Policy ST4, with reference and support for the text of paragraph 17.29. The amendments made aligns with our previous recommendations made in the 2021 representations.</p> <p>Given the importance of the Western Multi-Modal Transport Link, the flexible approach at the eastern (A23) end of the proposed link that seeks to balance the risk of safeguarding conflict against the potential loss of employment land and ability to deliver the Western Multi-Modal Transport Link as a strategic transport link is supported. The supporting feasibility study shows alternative options that could be deployed in the event a southern runway does come forward which is considered a sound approach given the uncertainty around a southern runway at this time and the need for wider land use impacts to be considered as part of any runway proposal at that time.</p> <p>Suggested Modifications:</p>
REP/050 (2023)	Homes England	ST4	<p>Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link The Draft Crawley Local Plan makes various references to the possible westward expansion of Crawley urban area into Horsham District to accommodate unmet housing needs that arise from this draft Local Plan and future growth. As above, this spatial development strategy is supported by Homes England.</p> <p>In relation to this, Policy ST4 identifies a search corridor for the part of the proposed Crawley Western Multi-Modal Transport Link that sits within the Borough's administrative boundary which appears justified.</p> <p>Suggested Modifications: However, given the strategic importance of the Western Multi-Modal Transport Link, more detail is required in the policy to support the delivery of the scheme, including:</p> <ul style="list-style-type: none"> - There is no detail on how proposals coming forward in the safeguarding corridor will be dealt with. While minor proposals are unlikely to affect its delivery, more major proposals should be required to safeguard the corridor within their respective proposals and show how the cross section within the feasibility study can be accommodated alongside the proposed development without prejudicing the form or strategic purpose of the Transport Link. - Noting that the Western Multi-Modal Transport Link is identified as 'developer led' in the West Sussex Transport Plan 2022 - 2026 Infrastructure priorities, more detail and further clarity is needed on how development coming forward within the wider Crawley area will contribute to the scheme delivery and the policy should be more supportive of proposed schemes that help to facilitate it. The Crawley Local Plan Transport Study is clear that the road is not solely related to development to the west of Crawley as suggested in the Draft Crawley Local Plan and therefore a mechanism or approach that secures a contribution from wider development coming forward within the district or adjacent areas should be identified.

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			<p>- While Compulsory Purchase Order is identified as potential land assembly requirement in the supporting text, it is suggested this is incorporated into the main policy text itself.</p> <p>As such, revised policy wording is recommended as follows for the policy to be justified: <i>The Local Plan Map identifies an Area of Search of land within Crawley Borough administrative area for a Crawley Western Multi-Modal Transport Link connecting the A264 with the A23.</i> <u><i>This Search Corridor will be safeguarded from development which would be incompatible with the future delivery of the Crawley Western Multi-Modal Transport Link.</i></u> <u><i>Where development proposals within the Borough show an impact or a cumulative impact on the highway network that would be addressed through the delivery of the Crawley Western Link, appropriate financial contributions will be sought in line with Policy Inf1.</i></u> <i>The design and route of the Western Multi-Modal Transport Link must take account of:</i></p> <p><i>a. its impact on (but not limited to):</i></p> <ul style="list-style-type: none"> • existing properties which could be affected by the final route. • residential and commercial properties close to the final route. • <i>the flood plain.</i> • the rural landscape. • local biodiversity. • sports pitch provision and recreation facilities; and • heritage and heritage landscape assets and visual intrusion. <p><i>b. the desirability and requirements of bus priority measures (including future proofing for forecast traffic growth and congestion).</i></p> <p><i>c. <u>the potential requirements and implications of any necessary phasing and land assembly, including the use of Compulsory Purchase Powers if required.</u></i></p> <p><i>Connectivity by non-vehicular neighbourhoods and the wider Sussex countryside should be maintained and enhanced.</i></p>
REP/053 (2023)	Quod on behalf of Barker Trust	ST4	<p>Western Relief Road</p> <p>Draft Policy ST4 continues to provide for the safeguarding for a search corridor for a Crawley Western Link Road linking the A264 with the A23. As the Site is the most sensible location north of Manor Royal to provide much needed employment floorspace, there needs to be a recognition that the new road does not compromise this important site. As such, its location should be dealt with as part of the Draft Local Plan 2023.</p> <p>Suggested Modifications:</p>

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REP/056 (2023)	Gatwick Airport Limited	ST4	<p>ST4: Safeguarding a Search Corridor for Crawley Western Relief Road</p> <p>66. We objected to this policy in the in the 2020 and 2021 Regulation 19 DCLP because the search corridor encroached into land safeguarded at Gatwick Airport for an additional runway. In July 2022, we attended a presentation by Systra which provided an update on the concept design work leading to the development of a Refined Area of Search. In September 2022, we were subsequently provided with additional documentation which presented a range of options and sought to justify the approach and selection of the Refined Area of Search.</p> <p>67. The additional documentation referred to engagement with the major Stakeholders, including Gatwick Airport Limited, and indicated that the Refined Area of Search will be acceptable to all of the major stakeholders, with the exception of the area to the north of County Oak industrial estate. GAL responded to the presentation and subsequently circulated documentation on the 22nd November 2022. A copy of that letter is attached as Appendix 1.</p> <p>68. The consultation response makes clear (see comments in paragraph 8.1.2) that GAL does not agree with this statement and that GAL continues to object to any indication of Local Plan development within the Gatwick Airport safeguarding area.</p> <p>69. Notwithstanding this objection, the written justification in the 2023 Regulation 19 DCLP refers to this scoping exercise and reconfirms the routes shown are illustrative only (paragraph 17.28). It goes on to state that the exercise has significantly reduced the overlap into the safeguarded land, encroaching only where there is scope for the route to be compatible with the safe operation of an additional wide-spaced southern runway. The extent of the overlap is apparent on the Policies Map and the figure following paragraph 17.31. We object to this statement as it is not at this stage possible to make this assessment as the design proposals for an additional runway have not been prepared.</p> <p>70. At the eastern end of the link road an interim approach is suggested which would allow the construction of the link road on safeguarded land which would be closed and re-provided elsewhere when the additional runway proposals come forward. The written justification acknowledges that the benefits of this interim option would need to be considered carefully, at the point of route feasibility assessment, against the costs of re-providing the route.</p> <p>71. We object to this suggested interim approach. Whilst the cost/benefit analysis of this approach is a matter for the funders of the link road, GAL is concerned that once constructed the costs of relocating the route would be used as a justification for frustrating or limiting the additional runway proposals. The written justification notes (paragraph 17.30) that agreement with GAL is an essential part of further work. In the absence of such agreement, we object to the Refined Area of Search including land within the safeguarded area.</p> <p>72. We also previously referred to the inherent inconsistency between Policies GAT2 and ST4. In order to bring the two policies into alignment, the criteria at part (a) of Policy ST4 should also include the land safeguarded at Gatwick Airport for an additional runway.</p>

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			<p>73. We reiterate the comments made in respect of safeguarding in our objection to Policy EC4. The matter of safeguarding was addressed in the Inspector's Notes of the PINS advisory video conference (April 2020) in respect of land 'North of Crawley'. The Inspector concluded that the removal of safeguarding cannot be regarded as certain, there is no known timescale for its removal and that GAL continues to object to its removal. Consequently, the proposal to remove safeguarded land was, in that case, considered "...unlikely to be effective". We consider that the circumstances which lead to that conclusion, also apply in this case. Furthermore, the Inspector's conclusion treats safeguarded land as a whole and does not give any support for parts of it to be eroded in a piecemeal fashion.</p> <p>Appendix 1: GAL letter to Crawley Borough Council dated 22nd November 2022 regarding the refined area of search for the Crawley Western Relief Road corridor</p>

YOUR LONDON AIRPORT
Gatwick

APPENDIX 1

22ND NOVEMBER 2022

FAO:
Alberto Marcheselli
Systra
3rd Floor, 1 Carey Lane
London
EC2V 8AE

Sent by email only to: amarcheselli@systra.com

Dear Alberto,

CRAWLEY WESTERN LINK – FINAL PRESENTATION AND REPORTS
SEPTEMBER 2022

I write further to the presentation given by Systra on 21st July 2022 and the following information that was circulated on 21st September 2022. Apologies for the delay in responding to the reports and supporting information, which is listed below.

- Northern Section Corridor Study Final Presentation, 21 July 2022
- Crawley Western Link Road – Northern Section Study, Refined Area of Search, 23rd March 2022
- Concept Design and Costing Report, 8th November 2021
- Various Appendices A to G

Gatwick Airport Limited's (GAL) safeguarding area

GAL's safeguarded land is discussed in Section 3.2 of the Refined Area of Search report. The report acknowledges that the safeguarding boundary constrains the space available for the Crawley Western Link Road (CWLR) route. GAL is concerned that, even though the safeguarded land is acknowledged and reference is made later in the report to GAL's previous request in 2021 to remove the safeguarded land from the proposals, that this request has been ignored and the two preferred route options would still encroach into GAL's safeguarded land.

In Para 1.1.1 of the report, it is stated that in relation to the safeguarded area "Where encroachment is unavoidable..." the aim of the study is to reach agreement with major stakeholders. The study clearly concludes that encroachment is avoidable (with shortlisted route options) but the approach to defining the area of search goes on to suggest the safeguarding may be disregarded if balanced against other criteria. It should be made clear that this is a judgment for the consultants and Crawley Borough Council as this impacts the shortlisting and analysis of the presented routes. GAL will continue to maintain its position of objecting to any proposals for development within the safeguarded area, in accordance with the safeguarding policy.

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Option Identification and Sifting Methodology

GAL considers that splitting the study area into three sections – Western, Middle and Eastern – is a sensible approach to assessing their suitability and enables a more granular consideration of the options. Within each of the three sections, the Refined Area of Search report considers the suitability of the long list of options.

GAL welcomes the removal of Options W5, MS6, ES4 and ES5 which are identified as causing 'considerable GAL safeguarding encroachment'. It is noted that Options WS1, WS3, WS4, MS2, MS3, MS4 and ES2 (slight encroachment) were retained for the purposes of the options sifting assessment, as were ES3 and ES3a which GAL has previously asked to be sifted out. At the end of the process, the retained options were:

- Western Section: WS1, WS2, WS3 and WS4
- Middle Section: MS1, MS2, MS3 and MS4; and
- Eastern Section: ES1, ES2, ES3, ES3a, ES12 and ES17

During the presentation the 'multi-criteria analysis' that informed the option sifting was shared with Gatwick. This includes ten criteria that are in turn weighted. The weightings are even for seven of the criteria (11.5%) with lower weightings for 'commercial/industrial impact' (7.7%), 'network performance' (7.7%), 'ease of delivery' (3.8%).

GAL would question the way in which Systra has arrived at the criteria for the sifting and the way in which they have been weighted. The justification in Paragraph 7.2.1 of the Refined Area of Search report is that "a weighting factor has been applied to help align the scoring with the factors which are most important to the CWLR scheme". GAL considers that the approach to the sifting assessment is flawed as the methodology lacks transparency over how and why certain criteria have a higher or lower weighting; the weighting scores are so evenly balanced that the final scores for each route option are very close together, meaning no real front runner can be identified during the sifting exercise; in addition the assessment omits any consideration of planning policy constraints, including GAL's safeguarded land.

Paragraph 7.9.3 of the Refined Area of Search report acknowledges the significant encroachment of Route Options ES3 and ES3a but considers that this should be offset by the "substantial positive aspects in comparison to other Eastern route options" (Paragraph 7.9.3). The report goes on to say:

"It is acknowledged that these options are unlikely to be able to coexist with a Gatwick southern runway, but the possible significant interim positives prior to a potential future southern runway expansion may warrant further investigation. In this instance, an alternative option post- southern runway implementation must also be agreed upon as part of a business case analysis in order to make ES3 and ES3a a feasible option."

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			<p>YOUR LONDON AIRPORT <i>Gatwick</i></p> <p>Summary</p> <p>Overall, whilst we understand the study and its reports to be matters for Crawley Borough Council, we have concerns over the reliance the Local Plan update may place on its outcomes. In particular, please note our comments on the sifting of options, the criteria used and the assessment itself. The wording of several sections (for example 5.3.5) seems to indicate an underlying assumption that the safeguarding can be given less weight or ignored, and indeed this is reinforced by the inclusion and assessment of options ES3 and ES3a, which appear to have been treated differently to other options with significant constraints. This indicates a tacit disregard for the safeguarding, which is a theme throughout the report. This is a matter for Crawley Borough Council to reflect in terms of the Local Plan, which in previous drafts accepted the current safeguarding status.</p> <p>GAL objects to the inclusions of Route Options ES3 and ES3a and does not consider that the implementation of new road infrastructure constitutes an 'interim' solution as its diversion post-implementation would present a number of significant challenges. GAL therefore requests again that Route Options ES3 and ES3a are removed from the sifting options. GAL does not support the Refined CWLR area of search proposals due to their significant encroachment into safeguarded land.</p> <p>Yours sincerely,</p> <p><i>Lydia Grainger</i></p> <p>Planning Manager Gatwick Airport Ltd</p> <p>Enclosures:</p> <p>Appendix 1: GAL's Detailed Comments on Refined Area of Search Report</p> <p>Appendix 2: GAL's Detailed Comments on Concept Design and Costing Report</p> <p>Appendix 3: GAL's Detailed Comments on Traffic Modelling Note</p>

Chapter 17. Sustainable Transport

Ref. No.	Respondent	Policy/ Para	Comments
			<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p style="text-align: center;">YOUR LONDON AIRPORT <i>Gatwick</i></p> <p style="text-align: center;">Appendix 1: GAL's Detailed Comments on Refined Area of Search Report</p> <p>GAL has the following detailed specific comments relating to the Refined Area or Search report, as set out below.</p> <ul style="list-style-type: none"> • Please ensure references to the airport safeguarding correctly reflect this is a national safeguarding policy relating to Gatwick Airport, it is not "Gatwick's" safeguarding. • Para 2.2.5 – clarification should be made in respect of the cross section for the CWLR middle section meeting both DMRB CD 127 and LTN 1/20 and the extent this is true for each of the different cross sections for the northern section (as shown in Figures 7 to 11). • Section 3.2 – refer to comment above, please refer to the national safeguarding relating to Gatwick Airport, it is not "Gatwick Airport Limited's safeguarded area" • Para 3.2.3 – the representation of the safeguarding changes are not accurate. The safeguarding area is consistent with one of three options from the 2019 Gatwick Masterplan referred to. The safeguarding area and masterplan presented at that time is the one developed for the Airports Commission and shared via a public consultation in April and May 2014, prior to the adopted Crawley Local Plan Policy GAT2. The masterplan option relating to the safeguarding was not revised between 2014 and 2019. • Para 5.3.4 – the report should be explicit around the assumptions made for what is "believed" to be acceptable encroachment into the safeguarding land, and whose determination that is. It has not been verified in relation to any further analysis or masterplan design in relation to the operation of Gatwick Airport under a two-runway segregated operation, or taking account of any other operational, safety, masterplanning or environmental considerations. Appropriate reference should be made for statements relating to "standard runway cross section" (note, this should be checked for other paragraphs as well, e.g. 5.3.16 and 5.3.21). • Para 5.3.5 – this is misleading, since all alignment options could be introduced before any airport expansion. What makes Option ES3 and ES3a different is that they would be introduced in the knowledge that they could not under any circumstances remain were Gatwick Airport to expand in accordance with the safeguarded area. As such, they represent a considerable risk and prospect of significant extra cost to Crawley Borough Council and West Sussex County Council to provide for the subsequent diversion or re-provision of the route. Note also that the location for the tie in at the A23 at Hydehurst Lane does not match the new roundabout location proposed in the GAL masterplan, which is clear from the illustration shown and therefore this statement should be removed or revised. • Para 5.3.6 – this suggests there is access within the Gatwick Masterplan for general traffic along the southern edge of the safeguarded area that could accommodate the traffic from the CWLR Northern Section. This is not the case, the extent of public highway lies only to the east of the A23 and does not provide an access route west of the A23. This statement needs to be removed and the approach taken for general traffic in option ES3a reconsidered. <p style="text-align: center;">5</p> </div> <div style="width: 48%;"> <p style="text-align: center;">YOUR LONDON AIRPORT <i>Gatwick</i></p> <ul style="list-style-type: none"> • Para 6.3.4 – please correct the statement regarding encroachment into the safeguarded area. All options that encroach into the safeguarded area present an issue and should be considered a risk for adopting a preferred alignment that may impact on a future operational masterplan. Noting that further design work would be required for both the highway and airport infrastructure it is fair to note that for some options the degree of overlap within the safeguarding area is not sufficient to sift them out at this stage. You may consider that for the purposes of this study, this applies to all identified options with the exception of ES3 and ES3a. • Section 7.2 – this section should make clear that neither the assessment criteria nor the weightings applied were discussed or agreed with stakeholders. We would note that a low weighting for ease of delivery, when there are considerable constraints and risks associated with the proposals yet a high weighting for cost, when only a very high-level costing exercise has been undertaken, seems illogical. Since there is little to distinguish between options in terms of a shift to active travel/public transport (noting variations of cross section) it is also surprising that this is given such a high weighting. • Para 7.2.3 – although the issue of safeguarding, which is used as a sifting criteria (but was then discounted in respect of options ES3 and ES3a) is not repeated in the MCA scoring we note that public transport and active travel is included as both a criteria and a high weighting, which shows an inconsistent approach has been applied. We also note that the views of Gatwick Airport Limited in respect of certain shortlisted options have not been taken into account in any of the scoring. • Section 7.4 and reference Appendix D – the differences between option WS1 and WS2 appear overstated in the scoring, in particular relating to residential impact, ease of delivery, stakeholder acceptability and cost. We would expect these to have much more similar scores given the level of assessment undertaken. • Section 7.6 and reference Appendix D – there appears to be double-counting of the residential impacts of options MS3 and MS4, which is also cited under environmental constraints, leading to lower scores than options MS1 and MS2 in both criteria. • Section 7.8 – the summary of the performance illustrates some inconsistencies and weaknesses in the assessment, in particular by not acknowledging the additional costs and risks associated with options ES3 and ES3a. Impact on commercial value is cited against the costs for option ES1 and ES2 yet land and property costs are excluded from the cost calculation and this indicates double-counting with the ease of delivery criteria, which also cites impact on commercial premises. The stakeholder acceptability criteria completely ignores Gatwick Airport Limited's views in respect of ES3 and ES3a. There is also reference to options ES1 and ES2 being assessed against other options under stakeholder and public acceptability rather than against the criteria itself. The cost and ease of delivery scores for options ES3 and ES3a should acknowledge the need for longer term costs and planning/delivery risk associated with their impact on the safeguarded area and these options should be scored lower accordingly. Failing to take future changes into account indicates the safeguarding issues have been ignored in the scoring for these options. • Para 7.9.1 – the first statement is incorrect. The sifting was discussed with stakeholders, the assessment (criteria and scoring) was not. <p style="text-align: center;">6</p> </div> </div>

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>Suggested Modifications:</p> <p>YOUR LONDON AIRPORT <i>Gatwick</i></p> <ul style="list-style-type: none"> • Para 7.9.3 – please correct the statement that ES3 and ES3a “...are unlikely to be able to coexist with a Gatwick southern runway...” to “...will not be able to coexist...”. In this same paragraph the note regarding what would be included in the business case analysis of option ES3 and ES3a should be acknowledged and reflected in the scoring of these options. Currently it is not reflected in any way. • Para 8.1.2 – we do not agree with the statement that the area of search “...will be acceptable to all of the major stakeholders...” even with the exception of the additional area identified for options ES3 and ES3a. Crawley Borough Council and its advisors may consider that the area of search is reasonable for the purposes of the Local Plan, given the need for further work both in relation to the Gatwick Airport Masterplan and any preferred highway alignment and design but including an overlap retains the risk that any alignment coming forward may not be acceptable and that GAL continues its position to object to any indication of Local Plan development within the safeguarding area. It is noted in particular that the study has not and cannot rule out options that wholly avoid encroachment into the safeguarded area. • Para 8.3.1 – we would query the use of the word “robust”, given the high-level nature of some of the assessment, and a number of inconsistencies in the way the assessment criteria have been developed and applied. <p>YOUR LONDON AIRPORT <i>Gatwick</i></p> <p>Appendix 2: GAL’s Detailed Comments on Concept Design and Costing Report</p> <p>GAL has the following detailed comments on the Concept Design and Costing Report, as set out below.</p> <ul style="list-style-type: none"> • Para 2.1.1 and 2.1.2 – the design standards do not make reference to LTN 1/20, as noted in the Refined Area of Search report and whether this would apply to both the 40m and 313.1m cross section. • Para 3.1.3 – note that this paragraph acknowledges “delivery risks” associated with encroachment into the safeguarding area but these risks are not reflected in the assessment scoring. • Para 3.3.1 – it may have been more instructive to provide a comparison with a route entirely outside the safeguarding area, given the relevance of the safeguarding to the study. • Para 4.1.3 – it would be useful to set out what elements are included in the works and construction estimate, given the other costs are only additional percentages of this cost components. For example, does the construction cost only differ due to the linear extent of full or restricted cross-section? • Para 5.2.1 – given that the Homes England proposals have been consulted upon it would seem logical to describe the impacts of adopting their proposed junction layout on the route options for the Western Section under consideration. As well as design and financial assessment, both planning and legal considerations should be considered for next steps to adequately reflect the constraints and risks of different options. <p>Appendix 3: GAL’s Detailed Comments on Traffic Modelling Note</p> <p>GAL has the following detailed comments on the Traffic Modelling Note (Appendix C and D).</p> <ul style="list-style-type: none"> • Para 1.1.1 – this section needs to introduce the context for the traffic flow information provided by Stantec and what status it has in regard to the Local Plan, including any assumptions regarding West of Ifield and other major developments in the area. • Para 1.1.3 – the “additional housing and commercial space” should be described and the reference to Hydehurst Lane flow estimates explained further. • Para 1.2.2 – there is insufficient explanation for the origin or context for the quoted 12% mode shift (from what, to what), how this relates to the modelling and if it is a risk to the design how this is accounted for in the assessment. • Appendix D – whilst it is assumed that the LINSIG diagrams are showing AM and PM results there are no labels to confirm this is the case.
REP/068 (2023)	Sussex Wildlife Trust	ST4	<p>SWT notes that this policy has changed its name since the last Regulation 19 Consultation, when it was referred to as ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road. Despite the name change, SWT sees that the area search still includes areas of known biodiversity value including a Local Wildlife Site and ancient woodland.</p> <p>We acknowledge that the supporting text (17.24) states:</p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>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.</p> <p>SWT is concerned that this commitment is not translated into the policy wording.</p> <p>Suggested Modifications: We propose an amendment to the policy wording, ST4, bullet point (a): The design and route of the Western Multi-Modal Transport Link must take account of: a. its impact on (but not limited to):</p> <ul style="list-style-type: none"> • existing properties which could be affected by the final route; • residential and commercial properties close to the final route; • the flood plain; • the rural landscape; • local biodiversity & protected sites; • sports pitch provision and recreation facilities; and • heritage and heritage landscape assets and visual intrusion. <p>This would support consistency with policy GI2 and NPPF2021; Para 174, 179 & 180.</p>
REP/087 (2023)	Woodland Trust	ST4	<p>Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link We welcome the confirmation in 17.24 that new highways crossing the Ifield Brook Meadows and Rusper Road Playing Fields Local Greenspace would be wholly unacceptable, given the impact this would have on ancient woodland. However, we are concerned that the search area for the proposed link road still includes ancient woodland at Rowley Wood ASNW (grid reference: TQ2791939226) and unnamed ancient woodland east of Bonnetts Lane.</p> <p>The Ancient Tree Inventory (ATI) for the area may be incomplete. We therefore recommend an exercise to complete the ATI (which lists ancient, veteran, and notable trees outside woods) across any sites allocated or proposed to be allocated for development, to comply with the requirements of the NPPF 2021 (paragraph 180c) for the protection of irreplaceable habitats.</p> <p>We consider that this policy is not legally compliant or sound unless these areas of ancient woodland are excluded from any future development sites, with appropriate buffers specified.</p> <p>Suggested Modifications: We propose modifying the policy under ST4 a) adding the words “and protected biodiversity sites” so that the policy reads: <i>The design and route ... must take account of a. its impact on (but not limited to): local biodiversity and protected biodiversity sites...</i> This would better reflect local plan Policy GI2.</p>

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Ref. No.	Respondent	Policy/ Para	Comments
REP/144	BYM Capital	ST4	<p>Draft Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road</p> <p>We object to draft Policy ST4 in respect of a search corridor that includes our ownership at the Astral Towers and Atrium site. The area of search covers a wide area, however two of the options (ES1 and ES2) identified in the Refined Area of Search report (Sysra, 23/03/2022) directly impact our ownership and would result in the loss of existing employment and/floorspace and prejudice our proposals subject to planning application ref.CR/2022/0653/FUL – this would further compound the existing shortfall of employment land/floorspace identified in the local plan evidence base and is therefore not considered justified nor positively prepared. The proposed search corridor should not result in the loss of existing employment sites within Manor Royal and should not restrict the sustainable expansion of Manor Royal (as encouraged by the employment policies in the draft plan). We request that the search corridor on the Local Plan Map is amended to exclude our ownership and the Manor Royal employment area – the Council’s “key mixed business location”. We strongly object to the proposed search corridor and the inclusion of the Astral Towers site if option ES1 and ES2 are taken forward.</p> <p>We have no objection to the search corridor being identified on the Local Plan Map further north, outside of our ownership, for instance on the basis of options ES3 or ES3a, on land which is currently identified for safeguarding.</p> <p>We recognise the significant amount of work that has been undertaken by CBC officers to reach this Regulation 19 stage of the Local Plan. Overall, BYM Capital are generally supportive of the employment policies. However as set out in the representations, there are a number of specific objections to these employment policies, as well as in-principle objections to draft Policy GAT2 (runway safeguarding), and Policy ST4 (safeguarding of a search corridor for a western link road).</p> <p>We reserve the right to participate in future Examination in Public hearing sessions in respect of the policies referenced in this representation.</p> <p>Suggested Modifications:</p> <p>To ensure that this policy is consistent with the wider employment strategy set out in the local plan, the boundary for the search corridor on the proposals map should be amended to remove our ownership and remove the Manor Royal employment area.</p>
REP/152	Save West of Ifield Campaign	ST4	<p>The multimodal transport link is a catch 22 for the borough. While it may well relieve the traffic congestion which is all too real within Crawley especially at rush hours, it will conflict with policies on heritage, environmental protection, and bio-diversity. It may also encourage the increased use of cars as opposed to using public transport.</p> <p>A multimodal road is huge in surface area. ‘Multimodal’ indicates separate lanes for buses, cars, cyclists and pedestrians in both directions. This would require swathes of erstwhile countryside to be lost. In <u>heritage terms</u> this would no longer make Crawley a town in the countryside. The north of Crawley is bordered by Gatwick Airport, the east by the M23 and the south by the A264. At present, the west of Crawley is the main area where the New Town concept remains i.e. where one can walk from the town through the old village of Ifield into the countryside without having to cross a busy road. To put a major road to the west will be to encircle the town in very large transport</p>

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			<p>routes. The description of '<i>It is an urban town which benefits from a countryside setting ...</i>' (para 2.1 p 19) will no longer be true.</p> <p>Noise pollution will be an intrusive environmental impact, especially from the 24/7 continuous hum from traffic. While electric cars might be quieter, they do not get rid of tyre noise. The severity of the pervasiveness of such noise can be experienced already on the east side of the town at heritage sites such as St Nicholas Church in Worth and the Peace Garden in Tilgate Park and in the neighbourhoods of Maidenbower, Pound Hill and Forge Wood. The detrimental effect of noise on people's health recognised in Policy EP4 Development and noise.</p> <p>The loss of woodland, hedgerows, fields and shaws, many of them ancient, will remove habitats in an area rich in wildlife and reduce the ability of the area to absorb carbon. The fine (FP) and extra fine particles (UFP) from tyre wear will pollute the air and the streams, many of which run through the area. The cross-boundary implications for the Green Infrastructure are incorporated in the Strategic Policy G11 vi.</p> <p>The time is right to rethink whether the multimodal road is the right answer to the very real problem that Crawley has with congestion. The Barton and Grant Health Map on p 34 is a graphic shows the interrelatedness of all these factors and the need to think globally.</p> <p>Suggested Modifications: The time is right to rethink whether the multimodal road is the right answer to the very real problem that Crawley has with congestion.</p>
REP/154	DWDLIP on behalf of AITUP	ST4	<p>Crawley Western Multi-Modal Transport Link: AIPUT welcomes the Crawley Western Multi-Modal Transport link to address the predicted increase in travel movements generate by the development of a second runway. AIPUT has reviewed policy ST4 (Area of Search for a Crawley Western Multi-Modal Transport Link) and the area of search for the Crawley Western Multi-Modal Transport link and is content with the interim search and search proposals. Policy ST4 requires that the design and route of the Western Multi-Modal Transport Link must take account of:</p> <ul style="list-style-type: none"> - existing properties which could be affected by the final route; - residential and commercial properties close to the final route; - the flood plain; - the rural landscape; - local biodiversity; - sports pitch provision and recreation facilities; and - heritage and heritage landscape assets and visual intrusion. <p>AIPUT therefore expect to be consulted on forthcoming design and route proposals ahead of any planning or compulsory purchase order applications.</p>

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Ref. No.	Respondent	Policy/ Para	Comments
			Suggested Modifications:
REP/151	Manor Royal BID	ST4	<p>Area of Search for a Crawley Western Multi-Modal Transport Link (Policy ST4): The Manor Royal BID recognises the need to provide relief to parts of the Crawley road network caused by new development to the west of Crawley. It is understood that there are a number of variables that make it difficult to be specific about the exact location of the proposed transport link and, therefore, it's potential impact on County Oak and Manor Royal properties. Para 17.28 refers to the initial scoping work considering the extent of the Gatwick safeguarded area. Para 17.30 refers to a possible interim measure to minimise the impact on commercial buildings in County Oak/Manor Royal ahead of any decision on progressing a second runway. There is concern regarding the possible impact on the existing commercial buildings of County Oak / Manor Royal and to any possible extensions to the Manor Royal area that might be impacted by the area of search for this transport link. It is also unclear why the area of search now stops at London Road (A23) when previously it extended further to the east to meet Gatwick Road. Therefore; <u>The Manor Royal BID asks that the Council considers this proposal for how it impacts existing buildings in County Oak / Manor Royal, development sites e.g. Jersey Farm, how any such road would facilitate development in or future extension of Manor Royal and how it might resolve long-standing issues of congestion e.g. by relieving pressure in the County Oak area. In respect of transport modelling, given the demand for space and the encouragement of more efficient and intensive use of land, the Manor Royal BID requests that transport modelling should look at junctions and capacity both with and without the Transport Link to provide more certainty concerning the extent of development and intensification that can be accommodated. Further, the BID asks that the Council clarifies why the Transport Link stops at the London Road (A23) when previously it extended to Gatwick Road in the east.</u></p> <p>Suggested Modifications:</p>

Noise Annex			
Ref. No.	Respondent	Policy/ Para	Comments
REP/060 (2023)	Savills on behalf on Bellway Homes	EP4 and Noise Annex	<p>Objection</p> <p>Following a thorough review of Policy EP4 and supporting guidance, Bellway Homes are of the view that proposed Policy EP4 and the supporting Noise Annex in relation to the proposed approach for protecting new residential development from noise would not be effective in doing so. This is explained below with suggested amendments to the policy wording.</p> <p>The shortcoming in Policy EP4, and the supporting noise annex, is that the stated noise criteria for 'Unacceptable Adverse Effects' are external noise levels and therefore do not account for any mitigation that could be adopted through the design that would reduce the external noise levels to acceptable levels in habitable areas.</p> <p>For example, the noise annex states that 'Unacceptable Adverse Effects' will occur where external aircraft noise levels are above 60 LAeq,16hour, or road traffic levels are above 66 dB LAeq,16. This suggests that any development on sites subject to these noise levels will be likely refused planning consent on the basis of principle. This ignores the possibility of reducing the noise to acceptable levels in the habitable areas via good acoustic design (e.g. acoustically upgraded facades, internal layouts, screening, etc), which are possible for many sites. As a result, in a borough such as Crawley, with Gatwick Airport and strategic roads, such as the M23, EP4 is a restrictive policy that would limit much needed housing coming forward in sustainable locations near employment and transport hubs.</p> <p>Rather than setting strict external noise limits, each proposed development should be assessed on its own merits and therefore it is not appropriate prevent a site coming forward for development without considering the achievable benefit of good acoustic design or mitigation that could be incorporated in the proposals. This would be in line with all relevant noise planning guidance, in particular; the central government guidance on noise relating to planning at https://www.gov.uk/guidance/noise--2 , which states:</p> <p><i>Can planning policies include noise standards?</i> <i>Plans may include specific standards to apply to various forms of proposed development and locations in their area. Care should be taken, however, to avoid these being applied as rigid thresholds, as specific circumstances may justify some variation being allowed.</i></p> <p><i>Paragraph: 007 Reference ID: 30-007-20190722</i> <i>Revision date: 22 07 2019</i></p> <p>It is clear from the central government guidance above that the proposed 'Unacceptable Adverse Effect' criteria should not be applied in their current form as rigid thresholds that do not allow for mitigation and benefits of good acoustic design.</p> <p>Suggested Modifications:</p> <p>Therefore, it is recommended that the following modifications to Policy EP4 (<u>red underlined</u>) which would bring the policy in line with central government guidance and other relevant noise-related planning guidance (e.g. ProPG – Planning & Noise, New Residential Developments):</p>

Noise Annex			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>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.</p> <p><i>A. Noise Sensitive Development</i> Residential and other noise sensitive development will be permitted where it can be demonstrated that users of the development will not be exposed to unacceptable noise disturbance from existing or future uses. Noise sensitive uses proposed in areas that are exposed to noise above the Lowest Observed Adverse Effect Level (LOAEL) or at <i>or above</i> 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 LAeq,16hr (57dB LAeq,8hr at night). For aviation transport sources the Unacceptable Adverse Effect is considered to occur where noise exposure is above 60dB LAeq,16hr. (57dB LAeq,8hr at night).</p> <p><i>D. Mitigating Noise Impact</i> Where proposals are identified as being in the Lowest Observed Adverse Effect Level (LOAEL) or at <i>or above</i> 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.</p> <p>The noise annex should also be updated in line with the above modifications to prevent the proposed 'Unacceptable Adverse Effect' criteria being applied in their current form as rigid thresholds. For brevity, the suggested modifications are not shown here however we believe they would be straightforward to implement. Updating the above policy wording would result in a more positively prepared, justified, effective and consistent with national policy in line with the Paragraph 35 of the NPPF relating to Tests of Soundness. This would help enable the Borough deliver new homes and meet housing need as described elsewhere in the emerging Local Plan Review.</p>

Parking Standards Annex			
Ref. No.	Respondent	Policy/ Para	Comments
REP/032 (2023)	West Sussex County Council	Page 298 – Electric Vehicle Charging Infrastructure	<p><u>WSCC Officer response to the Draft Crawley Local Plan 2024-2040 Submission Consultation (June 2023)</u></p> <p>This note sets out changes that Crawley Borough Council may wish to take into consideration but do not affect the soundness of the Local Plan.</p> <p><u>Suggested Changes to Local Plan</u></p> <p><u>Transport Planning and Policy: Policy on Electric Vehicles</u></p> <p>The Local Plan refers to the “Building Regulations Approved Document S: Infrastructure for electric charging vehicles, DLUHC, 2022” as a professional guidance document. It continues on page 298 to negate the existence of the latter by stating “Until the introduction of national requirements for EV charging infrastructure in new developments, through Building Regulations or otherwise, provision should be made as follows:</p> <p><u>Suggested Modifications:</u></p> <p>It is recommended to rephrase the statement as there is an existing national guidance for EV charging infrastructure in new developments since 2022.</p>

Crawley Local Plan

Legal Compliance & Key Documents

Regulation 19 Consultation May-June 2023 Representations

Local Plan Map, Duty to Cooperate, Sustainability Appraisal/Strategic Environmental Assessment,
Habitats Regulations Assessment

Local Plan Map			
Ref. No.	Respondent	Policy/ Para	Comments
REP/152	Save West of Ifield Campaign	HA1 Local Plan Map	SWOI comment The list of designated and non-designated assets in Strategic Policy H1 fails to mention village greens. Ifield Village Green is the only registered village green in Crawley. It is contained within the Ifield Village Conservation Area. It also does not appear on the interactive map, although other designated and undesignated assets (i.e. buildings and monuments) do.
			Suggested Modifications:
REP/146	Resident 59	HA2 Local Plan Map	The garage that we own is accessed from The Birches and not Hazelwick Road. It is under separate title and we have no connection with 73 Hazelwick Road. We would like the boundary of the conservation area to reflect that our garage is not Victorian in nature and was built in 2000 in amongst 1950s council garages
			Suggested Modification: Please can you reflect this in the boundary line for the conservation area. The boundary for our garage and the separation from the garden is identified on the map - as it is on land registry - but it is included in the conservation area – even though it is not accessed from Hazelwick road - but The Birches - And not at all part of any Victorian street scene.
REP/127 (2023)	Arora Management Services	Local Plan Map (Gatwick Airport Safeguarding Zone) GAT2	<p>Thank you for notifying us of the amended Regulation 19 Consultation of Crawley's draft Local Plan. We provided detailed comments on the last round of consultation (dated 29-06-21) and we confirm that our comments on the previous version of the draft Local Plan should still stand.</p> <p>We would like to additionally highlight, however, that the proposed removal of Schlumberger House (Use Class E) from the Airport Boundary means that the Arora Group are more likely to explore alternative uses for this site, and it would be possible to secure residential uses on the site using the Prior Approval (Class MA) route, subject to satisfying Transport, Noise, Contamination (etc...) considerations. The Arora Group currently have no intention of introducing residential uses onto this site and would rather pursue airport-associated uses, which would be consistent with the current designation, however if the site is removed from the airport boundary and added to the safeguarding zone, we would need to consider alternative uses for this site which are not linked to the airport, which could include the introduction of C3 uses.</p> <p>As a final point, and expanding on the concerns over safeguarding set out in the previous June 2021 response and the uncertainty surrounding the delivery of a main second runway (ignoring the proposals to allow use of the northern runway for some departing planes), we suggested a modification to Policy GAT2 (Safeguarded Land). Having considered this further, we suggest that Policy GAT2 be amended to allow temporary or meanwhile uses of safeguarded land, provided these meanwhile uses are consistent with surrounding land uses/planning designations, as relevant, on the basis that this would still allow local business to make efficient use of their land, expand and grow (in accordance with the NPPF) whilst satisfying the government's safeguarding requirements in respect of the draft national Aviation Strategy, Aviation 2050 (December 2018).</p>

Local Plan Map			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>Policies do not appear to have been fully justified and are detrimental to existing landowners' commercial interests.</p> <p>Suggested Modifications: On this basis, we suggest the following modification to Policy GAT2: Small scale development within this area such as residential extensions, the redevelopment of existing employment / commercial sites, or temporary uses consistent with other local plan policies, will normally be acceptable. The airport operator will be consulted on all planning applications within the safeguarded area.</p>

Duty to Cooperate									
Ref. No.	Respondent	Policy/ Para	Comments						
REP/011 (2023)	National Highways	Duty to Cooperate	<p>Table 1: Legal Compliance</p> <table border="1"> <thead> <tr> <th>NH Rep. No.</th> <th>Issue</th> <th>NH response</th> </tr> </thead> <tbody> <tr> <td>NH001</td> <td>Duty to Cooperate</td> <td>Crawley Borough Council ("the Council") has engaged with NH constructively, actively and on an ongoing basis on strategic transport matters relating to the SRN during the preparation of the Local Plan. NH hope this can continue up until the point of submission. NH would like to work with the Council and capture this process in a Statement of Common Ground prior to the Local Plan being submitted for examination. On the basis of the process followed and work undertaken during plan-making in respect of strategic transport matters relating to the SRN, NH considers that the Local Plan is legally compliant in respect of the Duty to Cooperate.</td> </tr> </tbody> </table> <p>Suggested Modifications:</p>	NH Rep. No.	Issue	NH response	NH001	Duty to Cooperate	Crawley Borough Council ("the Council") has engaged with NH constructively, actively and on an ongoing basis on strategic transport matters relating to the SRN during the preparation of the Local Plan. NH hope this can continue up until the point of submission. NH would like to work with the Council and capture this process in a Statement of Common Ground prior to the Local Plan being submitted for examination. On the basis of the process followed and work undertaken during plan-making in respect of strategic transport matters relating to the SRN, NH considers that the Local Plan is legally compliant in respect of the Duty to Cooperate.
NH Rep. No.	Issue	NH response							
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REP/050 (2023)	Homes England	H1	<p>West of Ifield</p> <p>Please find enclosed at Annexe A representations by Homes England to the Draft Crawley Borough Local Plan Review 2024 – 2040 Regulation 19 consultation (herein referred to as the 'Draft Crawley Local Plan'). These supersede previous Regulation 19 representations dated 29th June 2021.</p> <p>This response relates to Homes England's interests as a major landowner / promoter with a land interest at the Land West of Ifield, shown as SA101 in the Horsham District Council Regulation 18 Local Plan and which was identified as a preferred allocation site, Policy HA2, in the draft Horsham District Council Regulation 19 document (noting this was not consulted upon). The site falls both within and adjoining Crawley Borough Council's administrative boundary and directly impacts on, or is directly impacted by, proposals set out in the Draft Crawley Local Plan and supporting evidence base.</p> <p>Within the context of a significant undersupply of housing land being proposed in the Draft Crawley Local Plan and the need for other identified development needs (such as education and health) and delivery of strategic infrastructure to be facilitated by development outside of the Crawley, West of Ifield can demonstrably and proactively respond in a timely manner to the strategic growth priorities and unmet development needs within the Borough.</p> <p>This response is therefore targeted, focusing on potential soundness issues that may impact on the delivery of the emerging Land West of Ifield proposals, or set out where changes to the Draft Crawley Local Plan should strengthen commitment to and support delivery of Land West of Ifield as an urban extension required to meet identified development needs within Crawley and satisfy the authorities Duty to Cooperate.</p> <p>The following points raise issues of potential soundness that need to be addressed:</p>						

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>• Duty to Cooperate: It is noted that at the time of this Regulation 19 consultation, a Statement of Common Ground (SoCG) with Horsham District Council has not been published. As per the National Planning Policy Framework (NPPF) and national guidance, to be found sound it is necessary for plans to be positively prepared in a way that seeks to accommodate identified needs with a SoCG prepared and updates to be published throughout the preparation of the Plan. Therefore, until such a time as a SoCG is published to demonstrate ongoing discussions have been held with Horsham District Council and how significant shortfall in housing supply is being considered by adjoining authorities, the Plan is not considered to be sound and may not demonstrate legal compliance.</p> <p>Land West of Ifield For clarity and through this representation, 'Land West of Ifield' is the site shown as SA101 in the Horsham District Council Regulation 18 Local Plan and which was identified as a preferred allocation site, Policy HA2, in the draft Horsham District Council Regulation 19 document (noting this was not consulted upon). This site is under the majority control of Homes England. The site is ideally located to make a significant contribution to the housing and infrastructure needs, and economic priorities of Crawley, respond proactively and in a timely manner to the strategic growth priorities and unmet development needs within the Borough.</p> <p>The emerging allocation (SA101) is located within Horsham District, but a small portion of the wider site under Homes England's ownership lies within Crawley Borough (Ifield Brook Meadows Local Wildlife Site (Policy GI2) and Local Green Space (Policy GI4)).</p> <p>Land West of Ifield provides the opportunity to realise significant opportunities and benefits for Crawley and meet a number of the significant unmet needs identified in the Draft Crawley Local Plan and Topic Paper 1 Unmet needs and Duty to Co-operate – including housing, education, health – and other strategic infrastructure provision, in a manner which aligns with the Vision within the Draft Crawley Local Plan, to create high quality facilities and strong communities, improve job opportunities, meet housing needs and protect the environment, including:</p> <ul style="list-style-type: none"> - 3,000 market and affordable homes, to help meet the needs of Horsham and Crawley - 2 New Schools, 1 Primary and 1 Secondary - up to 2,700 jobs on/off site, providing skills and training opportunities - A Neighbourhood Centre, with community space, opportunities for health provisions - Delivery of part of Western Multi-Modal Transport Link and investment in sustainable and active travel opportunities identified in the supporting Infrastructure Delivery Plan. <p>The emerging allocation aligns with the objectives found in Homes England's Strategic Plan 2023 to 2028, to deliver "key enabling infrastructure in place to unlock development" and to deliver "mixed-use places that create value and benefit local communities". Working with a range of delivery partners, Homes England will act as a</p>

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			<p>master developer to accelerate the delivery of key infrastructure to facilitate housing delivery in an efficient and effective manner, achieving the highest design and sustainability standards across the scheme through the construction process as well as delivering significant social, economic and environmental benefits to the existing neighbourhoods of Crawley.</p> <p>Wider Strategic Opportunity – Land West of Crawley Land West of Ifield is located within a broader area of search identified as ‘Land West of Crawley’ in the Horsham Draft Local Plan Regulation 18 Consultation March 2020.</p> <p>Subject to the detail and final decisions on strategic allocations within the Draft Horsham Local Plan, this wider growth opportunity could continue to play an important role in meeting future development needs over multiple plan periods. The Draft Crawley Local Plan and supporting evidence base sets out the importance of long-term working with neighbouring authorities and the role of sustainable urban extensions in meeting immediate and longer-term unmet development needs and infrastructure delivery. It is therefore important that the Draft Crawley Local Plan does not prejudice the delivery of Land West of Ifield.</p> <p>Response to the Draft Crawley Local Plan Regulation 19 consultation document May 2023 Spatial Strategy and Duty to Cooperate Policy H1 (housing provision) states that the Draft Crawley Local Plan shall provide for a minimum of 5,030 dwellings across the plan period to 2040, with a resultant unmet housing need of approximately 7,050 dwellings. Homes England recognises that given the tightly drawn boundaries of Crawley there are challenges in meeting the full housing needs as set by the standard methodology within the council’s administrative area and that the unmet need increases overtime in line with the stepped housing trajectory. Homes England notes that since the previous consultations, Crawley Borough Council has sought to increase the amount of housing that can be accommodated within the administrative area through the Compact Residential Development Study. While no view is taken as to what the exact requirement for meeting the unmet need is at this stage, there is unquestionably a significant unmet housing needs from this authority, with the unmet needs having to be met through working with neighbouring authorities and proactively identifying locations for sustainable urban extensions close or adjacent to the Crawley boundary.</p> <p>Furthermore, the Infrastructure Plan (May 2023), Economic Growth Assessment and Duty to Cooperate Statement (May 2023) set out that there are wider unmet needs arising that cannot be accommodated within the borough’s administrative area due, predominantly, due to the tightly drawn boundary:</p> <ul style="list-style-type: none"> - A site for a 6-8FE secondary school, catering for 180-240 places per year group - Special Educational Needs - GP provision (noting reorganisation into Primary Care Networks is being sought to increase resilience and enhance capacity)

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			<p>- Employment land required to support the unmet housing needs (the evidence suggests that additional employment land would be required to support any future urban extensions).</p> <p>The NPPF recognises at paragraph 73 that the delivery of large numbers of new homes can often be best achieved through planning for larger scale development where they are well located, designed and are supported by necessary infrastructure. The NPPF further encourages authorities to work together to identify suitable locations for such development where it can meet identified needs in sustainable way (paragraph 35a and 73).</p> <p>In this context, to address the above unmet needs, Homes England welcomes Policy H1 which provides a commitment for Crawley Borough Council to work closely with neighbouring authorities to explore opportunities, particularly with regard to urban extensions. Given the shortfall in housing supply increases across the plan period, there is a real opportunity for neighbouring large-scale extensions to deliver the homes and supporting infrastructure when they are most needed.</p> <p>As such, <i>in principle</i> the proposed approach through the Draft Crawley Local Plan and within Policy H1 to meet as many homes as possible within the authority's boundary, and otherwise engage with neighbouring authorities to address any unmet needs, is considered to be consistent with national policy, justified and effective, and, in this regard, to be sound against paragraph 35 of the NPPF.</p> <p>Indeed, the Land West of Ifield would align with and support the approach taken within Policy H1 and the NPPF in this regard, as being capable of sustainably delivering homes, schools, employment, facilities, greenspace and new sustainable connections to Crawley as set out previously in these representations. In particular, the 'action' within the Duty to Cooperate Statement May 2023 to continue ongoing discussions between Crawley Borough Council, Horsham District Council and Homes England as part of the Horsham District Local Plan Review process and through pre-application for Land West of Ifield proposals is particularly welcomed.</p> <p>However, the NPPF is clear that in order for the Draft Crawley Local Plan to be positively prepared and effective, and therefore sound, the strategy should be informed by agreements with neighbouring authorities, and in particular Statements of Common Ground. Indeed, the NPPG paragraph 009 Reference ID 61-009-20190315 further makes it clear that "<i>authorities should produce, maintain and update one or more statements of common ground throughout the plan making process</i>".</p> <p>In this regard, whilst the Duty to Cooperate Statement details the engagement that has been held with neighbouring authorities and ongoing actions, it is noted that at the time of this Regulation 19 consultation no Statement of Common Ground between Crawley Borough Council and Horsham District Council has been published (confirmed in Table 2.1 of the Duty to Cooperate Statement). On this basis, it is not possible to understand those matters (including housing and wider infrastructure delivery) which have been agreed or are part of ongoing discussions with Horsham District Council, which has particular relevance to the requirements sought in paragraph 12.23 of the Draft Crawley Local Plan, as discussed below.</p>

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			It is therefore strongly recommended that a Statement of Common Ground is published at the earliest opportunity with the remaining authorities, and in particular Horsham District Council, and until then the Plan cannot be considered legally compliant or sound.
			Suggested Modifications:

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REP/044 (2023)	HX Properties Ltd. (Agent: Tim North Associates)	SA	<p>Dear Sirs</p> <p>Crawley Borough Local Plan 2024 – 2040: Submission Consultation Draft May 2023</p> <p>My clients, HX Properties Ltd, raised representations objecting to Policy EC6 of the Regulation 18 and 19 versions of the same emerging Local Plan Review, concerned with <i>“Hotel and Visitor Accommodation”</i>, on the basis that the policy at the time was found to be unsound because it had not had regard to the implications surrounding airport related passenger car parking.</p> <p>Policy EC7 of the Crawley Borough Local Plan 2024-2040 Submission Consultation Draft May 2023 (hereinafter referred to as CBLP 2024-2040) is the latest iteration of earlier versions of the policy relating to <i>“Hotel and Visitor Accommodation”</i>. HX Properties Ltd object to Policy EC7 on the grounds that it is also unsound for the reasons set out in these representations. These representations should be taken as superseding those submitted to your Council under Regulation 19 Consultation on 28th February 2020.</p> <p>The basis behind the earlier Regulation 18 & 19 versions of the same Local Plan Review was to provide a sequential test for hotel and visitor accommodation outside the town centre, whilst at the same time permitting the same uses on the Manor Royal Main Employment Area, where it could be demonstrated that the development caters specifically for the needs of Manor Royal. The earlier iterations of the same policy sought to restrict parking at new hotels and visitor accommodation to that solely in use for staff and guests in residence at the particular development, and not to be used for any other purpose, including long term off-airport car parking.</p> <p>At the time of the Regulation 19 Consultation, my clients agreed with the underlying purpose of what was then the first paragraph of Policy EC6 which relied upon the sequential test in accordance with the NPPG on <i>“Town Centres and Retail”</i>, where the underlying aim is to guide main town centre uses towards town centre locations first, and then if no town centre locations are available, to edge of centre locations and, if neither town centre locations or edge of centre locations are available, to out of centre location (with preference for accessible sites which are well connected to the town centre).</p> <p>Your Council accepts <i>“Hotel and Visitor Accommodation is identified in the NPPF as a main town centre use, and is subject to the sequential test”</i>, yet seeks to depart from the underlying purpose of the sequential test concerning <i>“Hotel and Visitor Accommodation”</i> in Policy EC7 of the CBLP 2024-2040. In this respect, despite recognising that <i>“... Crawley hotels also serve a particular airport-related function for passengers, air crew and other airport users”</i>; Policy EC7 proceeds to state that <i>“Gatwick Airport is considered to represent a sustainable location for visitor accommodation”</i>.¹ In my clients view, your Council has conflated the importance to be attached to the sequential test, a significant factor at the present time given the well published decline of town centres; and issues generally concerning sustainable development. If the two concept were the same, there would be no need for the sequential test.</p>

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			<p>Your Authority has altered the policy on “<i>Hotels and Visitor Accommodation</i>” in Policy EC7 as part of the CBLP 2024-2040 so that the sequential test is exempt from being applied to hotel and visitor accommodation on land at London Gatwick Airport. My clients consider this approach to be unsound, especially when it is realised there is no requirement in Policy EC7 for on-airport hotels to show a demonstrable need.</p> <p>Put simply, if a demonstrable need is required for on-airport passenger car parking, the same must also apply to a mixed or composite use of hotel and airport related car parking, especially where one of the primary components of the same mixed or composite use, is airport related car parking. The contention advanced by my clients that on-airport hotels and visitor accommodation should be required to demonstrate a need before planning permission is granted, is given support through the wording of Policy EC7 : “<i>Car parking related to on-airport hotel development must meet the requirements of Policy GAT3</i>”.</p> <p>It is recognised that the Airport Owner and Operator enjoy permitted development rights in accordance with Schedule 2 Part 8 Class F of the Town & Country Planning (General Permitted Development) (England) Order 2015 (As Amended). However, as your officers will appreciate the phrase “operational building” is defined in Schedule 2 Part 8 Class O as meaning “<i>a building, other than a hotel, required in connection with the movement or maintenance of aircraft or with the embarking, disembarking, loading, discharge or transport of passengers, livestock or goods at a relevant airport.</i>” In short, hotels do not benefit from permitted development rights, reinforcing the point that not only should the sequential test be applied in accordance with national advice, but similarly so too should a demonstrable needs test be required to be met in respect of on-airport hotel development as part of Policy EC7.</p> <p>These issues are particularly important in that it is understood that your Authority has altered its position from one where it was previously contended that airport related car parking at hotels and guest houses comprised an ancillary use which did not constitute development requiring planning permission. That position is no longer applied, rightly in my clients’ view.</p> <p>It has also been noted that the change in approach towards hotel and visitor accommodation on land at London Gatwick Airport has resulted in a change to the</p> <p>SA/SEA relating to Policy EC7. Option 2 of the SA/SEA relating to Policy EC7 concerns a policy approach of providing dedicated hotel and visitor accommodation through locally specific planning guidance for such uses, including in the town centre, Manor Royal and Gatwick Airport. The same option, it is said, ensures consistency with Policy GAT3, preventing the provision of airport-related parking in off-airport hotels and requiring on-airport hotels to comply with the requirements of Policy GAT3.</p> <p>What preferred Option 2 entails is that the most preferable location for hotel and visitor accommodation in terms of the sequential test, namely Crawley Town Centre, is to be regarded as an off-airport hotel site,</p>

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			<p>where it meets the needs of passengers, air crew and others using the airport, at a time when the Government is seeking to encourage investment in town centres as a means of preventing their decline. Furthermore, where there is an absence of any qualifying conditions concerning on-airport hotels and visitor accommodation, can only mean that the same development is placed in a position of readily undermining the same uses in Crawley Town Centre, at the same time afforded preferential status to hotel provision on land at Manor Royal, where a demonstrable need is required to be shown on how the development will cater for the business needs of the Employment Area.</p> <p>In my clients' opinion that approach simply cannot be right at a time when hotels in Crawley Town Centre are meeting the needs of passengers, airport crew and others using London Gatwick Airport. Indeed, far from re-invigorating the vitality and viability of Crawley Town Centre; the preferred option in terms of Policy EC7 has the propensity to hasten its decline. It is contended by HX Properties Ltd that this approach is misguided, being a direct result of your Council prioritising the need to prevent all airport related car parking outside the boundaries of London Gatwick Airport, from taking place, to the extent of discouraging a form of development which Government policy seeks to support in town centre locations.</p> <p>To compound the issue, recent developments granted planning permission by your Council for hotels on-airport have been allowed without any car parking. The requirement to meet on-airport car parking associated with on-airport hotel development, in situations where no dedicated car parking is or will have been made available, will have a consequential impact on meeting other future on-airport car parking provision.</p> <p>In considering this matter, reference should be made to Application No. CR/2020/0707/NCC which was made pursuant to Section 73 of the Town & Country Planning Act 1990 (As Amended) and sought permission to allow the continued operation of the Hampton by Hilton Hotel, North Terminal, Gatwick Airport RH6 0PJ without complying with Condition No. 3 attached to the original planning permission Reference No. CR/2010/0692/FUL. Condition No. 3 attached to the earlier permission and the reason for its imposition are set out below:-</p> <p><i>"3. The hotel shall not be occupied until the parking spaces shown on the submitted plans have been provided and constructed. The areas of land so provided shall not thereafter be used for any purpose other than the parking of customers' vehicles."</i></p> <p>The reason for imposing this condition read as follows:-</p> <p><i>"To ensure that adequate and satisfactory provision is made for the accommodation of vehicles clear of the highways in accordance with Policy GC3 of the Crawley Borough Local Plan 2000."</i></p>

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			<p>Interestingly, one of the factors advanced on behalf of Gatwick Airport Ltd to justify an absence of any dedicated car parking associated with the Hampton by Hilton Hotel, a consideration which was accepted by your Council, read as follow:-</p> <p><i>“The Hilton by Hampton Hotel would not be alone in not having any designated parking. The 245-bedroom bloc hotel at South Terminal (permitted in 2012) has no parking, nor has any parking been required as part of a recent (2019) permission for its extension. The 46-room “Yotel” at South Terminal similarly has no car parking.”</i> (my emphasis)</p> <p>It can be seen that the proposition that hotel development on-airport is required to have its own on-airport parking for guests has simply not been adhered to by your Authority. On the contrary, by allowing no dedicated car parking in associated with on-airport hotels is simply a recipe for exacerbating problems relating to on-airport parking supply generally. This is particularly the case where as a consequence of the Hampton by Hilton Hotel having no dedicated car parking, and due to GAL’s intention to redevelop what was Car Park M, including the area used for parking by Hampton by Hilton Hotel, its provision was subsequently decanted into Multi Storey Car Park 7 where some 60 spaces were intended to be made available for its use.</p> <p>The approach adopted by your Council towards car parking provision associated with off-airport hotels is contrary to the reasoned justification set out in paragraph 9.89 of the CBLP 2024-2040 where it is concerned with Policy EC7, viz:</p> <p><i>“9.9 Hotels are an NPPF main town centre use, and support Town Centre’s 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.”</i></p> <p>In SA/SEA terms, two further options should have been explored in terms of Policy EC7 with regard to hotel and visitor accommodation. The first of these two additional options is where preferential treatment in terms of location for hotel and visitor accommodation is provided in Crawley Town Centre in accordance with the sequential test, and in Manor Royal, but only where it can be demonstrated that the scale and function of hotel and visitor accommodation would not undermine the established business role of Manor Royal. The second of these two further options is to permit hotel and visitor accommodation on-airport, where a demonstrable need can be shown to exist for such use, and where there are no more sequentially preferable locations available.</p> <p>Policy EC7 is however unsound for other reasons, in that it seeks to permit hotels and visitor accommodation on land at Manor Royal, subject to it catering for the business needs of the same employment area, and being used solely for staff and guests in residence of the development. Policy EC3 is</p>

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			<p>specifically concerned with Manor Royal, with the reasoned justification set out at paragraph 9.47 outlining those complementary business facilities and staff amenities needed to support the day-to-day requirements within the employment area, with no account taken of hotel or visitor accommodation. In this way the two policies are incompatible in respect of the significance afforded to hotel and visitor accommodation.</p> <p>Policy EC7 fails to take into account that there many hotels in the vicinity of London Gatwick Airport which use their car parks as a temporary drop off facility in connection with a long term off-airport car parking provider, where cars are moved to an alternative location, whether on or off-airport, pending the customers return to the hotel from a holiday or business trip.</p> <p>The Car Parking Management Plan relating to a proposal to construct extensions and convert areas of the existing Ibis Gatwick Hotel, London Road, Northgate, Crawley West Sussex to create 57 additional rooms, resulted in a reduction in car parking spaces on the same land from 73 to 33. This was accepted by your authority, and is an example of the measures taken by a hotel in order to avoid a material change of use occurring, from a primary use as a hotel to a mixed or composite use as a hotel and for long term off-airport car parking purposes (Crawley Borough Council Ref No CR/2016/0580/ FUL refers).</p> <p>The approved Car Parking Management Plan is simply one example which has unintended consequences, in that hotel guests are provided with a number of choices of how to ensure that their vehicle is not left at the Ibis Gatwick Hotel during their leisure or business trip, being kept elsewhere, either at an on or off-airport parking site. This approach clearly has obvious benefits to the Ibis Gatwick Hotel in terms of an increase in the number of rooms and hence revenue stream, at the same time intensifying reliance and therefore need for all kinds of on and off-airport car parking facilities able to cater for the hotel's car parking requirements.</p> <p>Schemes of this nature also have a consequential impact on future supply considerations for various types of on and off-airport car parking, with associated implications when considering public transport modal share requirements in the context of the May 2022 Section 106 Legal Agreement, and October 2022 ASAS. In the case of Gatwick Airport Ltd, they also benefit from this process in the event that the car is parked on-airport.</p> <p>In circumstances where hotel guests are prevented from leaving their vehicle at the particular hotel for the duration of their leisure or business trip in order to avoid a material change of use occurring involving long term passenger related car parking, has itself unintended consequences. It means that additional trips are involved transporting the passenger's car to an alternative location which may be either on or off-airport during the passenger's trip, before their vehicle is returned to the hotel awaiting their arrival. In my clients' view this process also has the propensity to exacerbate unauthorised long term off-airport car parking, of no benefit to the Council or operators of lawful long term off-airport car parking sites.</p>

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			<p>In previous appeal decisions regarding long term off-airport car parking, your Authority has accepted that unauthorised car parking provides a constituent part of airport related passenger parking supply which is likely to continue into the future.</p> <p>For the reasons contained in these representations Policy EC7 is considered unsound; is inconsistent with Policy GAT3 and has implications for airport related car parking generally from a wider sustainability perspective, especially where it concerns hotel and visitor accommodation.</p> <p>Suggested Modifications:</p>
REP/044 (2023)	HX Properties Ltd. (Agent: Tim North Associates)	SA/SEA GAT3	<p>Dear Sirs</p> <p>Crawley Borough Local Plan 2024-2040: Submission Consultation Draft May 2023</p> <p>My clients, HX Properties Ltd, object to the assessment carried out in the Sustainability Appraisal/Strategic Environmental Assessment (hereinafter referred to as SA/SEA) dated May 2023 accompanying the Submission Consultation Draft Version of the Crawley Borough Local Plan 2024-2040 (hereinafter referred to as the CBLP 2024-2040), where it relates to Policy GAT3.</p> <p>It is contended that the SA/SEA is deficient and unsound where the appraisal concerns Policy GAT3. There is a duty to carry out a legally adequate SA/SEA in order to comply with the EU Strategic Environmental Assessment Directive 2001/42.</p> <p>The SA/SEA must consider Policy GAT3 and “reasonable alternatives” to it, with Article 5 of the Directive setting out the requirement to identify, describe and evaluate the likely significant environment effects of “reasonable alternatives”. These provisions have been transposed into UK law through the Environmental (Assessment of Plans and Programmes) Regulations 2004, Regulation 12 being involved in the preparation of an environmental report.</p> <p>It is contended that additional “reasonable alternatives” to Policy GAT3 exist, which have not been evaluated by the Local Planning Authority, which it is argued represents a fundamental flaw in the soundness of the assessment process. There is no obligation, as far as the law is concerned, to choose the most sustainable option, or the most sustainable of two policy options, since the requirements of the appraisal are entirely procedural [R (on the application of Friends of the Earth) v The Welsh Ministers (2015) EWHC 776 (Admin)] {12} and {75}.</p> <p>Reasons must, however, be given for the rejection of “reasonable alternatives” so that consultees are able to know what those reasons are. (Save Historic Newmarket Community v Forest Heath District Council (2011) EHC 606).</p>

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			<p>In the case of the Submission Consultation Draft version of the CBLP 2024-2040, two alternative policy scenarios have been considered.</p> <p>Option 1 is the provision of additional or replacement airport-related car parking which will only be permitted where it is (i) located within the airport boundary; and (ii) it is justified by demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport within the airport boundary. Option 2 is to allow for the provision of additional or replacement airport-related car parking within the airport boundary provided it is justified by a demonstrable need.</p> <p>Option 2 does not proceed to qualify what is meant by demonstrable need, as is the case with Option 1, although the Commentary where it relates to Option 2 refers to the Section 106 legal agreement, including the requirement to provide sufficient, but no more on-airport car parking spaces than necessary to achieve a combined on and off-airport supply that is proportionate to 48% of non-transfer passengers choosing to use public transport for their journeys to and from the airport by 2024.</p> <p>To the extent that the Submission Draft Plan extends to a period from 2024 to 2040, no reference is made in either Option in the Submission Consultation Draft version of the CBLP 2024-2040 to the latest published ASAS 2022-2030 which includes a target seeking to achieve 52% of passenger journeys to the airport by public transport by 2030, as part of meeting a target of 60% by sustainable modes and ultra-low or zero emission vehicles.</p> <p>Furthermore, no reference is made in either Option in the same document to airport related car parking involving the Northern Runway project for which a DCO application is expected to be submitted imminently to the Secretary of State at the time of writing these representations.</p> <p>The SA/SEA as part of the statutorily adopted Crawley Borough Local Plan 2015-2030 considered two options in respect of the predecessor version of Policy GAT3, namely Option 1 which was to provide additional car parking within the airport boundary, and Option 2 to allow car parking in other areas.</p> <p>Option 1 in the CBLP 2024-2040 has the same intention as Option 1 relating to the same policy where it concerns the statutorily adopted Crawley Borough Local Plan 2015-2030.</p> <p>Option 2 in the CBLP 2024-2040 also has the same underlying aim as Option 2 in the statutorily adopted Crawley Borough Local Plan 2015-2030.</p> <p>The latter becomes evident from the High Court judgment Holiday Extras Ltd v Crawley Borough Council (2016) EWHC 3247 (Admin) delivered on 30th November 2016 relating to the Section 113 challenge to the SA/SEA concerning Policy GAT3, wherein the Planning Policy Manager for the Borough Council is recorded</p>

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			<p>as stating that Option 2 was a relaxation of Policy GAT3 by “replacing the priority for the airport with a policy which would allow on and off parking to meet needs.” {14}</p> <p>The SA/SEA comprising part of the CBLP 2024-2040 considers both policy options against ten sustainability objectives. Sustainability objectives 1 to 8 inclusive set out in the SA/SEA dated December 2015 are precisely the same as the sustainability objectives against which Policy GAT3 of the CBLP 2024-2040 has been assessed. Sustainability objectives 9 and 10 where they relate to the SA/SEA dated December 2015 concerning the adopted Local Plan have subsequently been amalgamated to produce one sustainability objective 9 in the SA/SEA of the CBLP 2024-2040.</p> <p>In effect, what were previously sustainability objectives 9 and 10 namely “To promote active cohesive and socially sustainable communities” and “To ensure everyone has the opportunity to participate in sport and to encourage active, healthy and independent lifestyles” respectively, have now been amalgamated into a single sustainability objective 9 where it forms part of the latest version of the SA/SEA concerning Policy GAT3 in the Submission Consultation Draft May 2023, viz: “To ensure healthy, active, cohesive and socially sustainable communities. To ensure all benefit from a good quality of life., To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.”</p> <p>It follows that the SA/SEA methodology has not materially changed between that relied upon in the adopted Crawley Borough Local Plan 2015-2030 where it relates to Policy GAT3, and that which forms the basis to the Submission Consultation Draft 2024-2040 where it concerns the same policy.</p> <p>This being the case, and given that the two policy options are virtually identical between the two SA/SEAs; no reasoned justification has been advanced as to why the scores in respect of the Submission Consultation Draft May 2023 SA/SEA where it relates to Policy GAT3 has now changed.</p> <p>In the SA/SEA dated December 2015 relating to the adopted Crawley Borough Local Plan 2015-2030, the two options concerning Policy GAT3 scored identically in respect of all ten sustainability objectives. It is therefore surprising that when the same two options in the latest version of Policy GAT3 are examined in the context of the SA/SEA relating to CBLP 2024-2040, different scores are recorded, particularly in respect of Option 2. Sustainability objectives 1 and 2 concerned with the need to minimise climate change, and adapt to climate change respectively, both scored a single minus, (i.e. having a negative impact on the sustainability objective) in respect of both options relating to Policy GAT3 of the adopted Local Plan.</p> <p>The scoring has now been altered in the Submission Consultation Draft May 2023 where it concerns Policy GAT3. Sustainability objectives 1 and 2 now score a double minus (significant negative impact on the sustainability objective) where it relates to both Options 1 and 2.</p>

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			<p>Similarly, in respect of sustainability objective 6 which relates to conserving and enhancing biodiversity and landscape, Options 1 and 2 of the Submission Draft May 2023 both score a possible negative or slight negative impact where previously as part of Policy GAT3 in the adopted Local Plan they had a neutral impact. Similarly in the case of promoting sustainable journeys forming sustainability objective 7, Option 1 of the latest version of the SA/SEA now scores a single minus, being a negative impact; whilst Option 2 scores a double minus, being a significantly negative impact.</p> <p>It is alterations of this nature at times when circumstances have not fundamentally changed and the sustainability objectives remain identical, which casts doubts on the veracity of the entire SA/SEA process. All other sustainability objectives score identically between the two SA/SEAs where they relate to Policy GAT3 in the Submission Consultation Draft May 2023.</p> <p>My clients find that the SA/SEA concerning Policy GAT3 in the CBLP 2024-2040 to be deficient and unsound for other reasons. Firstly, Option 1 where it forms part of the CBLP 2024-2040 allows for additional or replacement airport-related car parking, subject to two criteria. The second criterion is that it is justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport within the airport boundary.</p> <p>It is a matter of fact that GAL are able to rely on the provisions of Schedule 2 Part 8 Class F of the Town & Country Planning (General Permitted Development) (England) Order 2015 (As Amended). The Airport Owner on "Operational Land" irrespective of the nature of the on-airport related car parking product, does not require express planning permission and therefore do not have to justify "a demonstrable need in the context of proposals for a achieving a sustainable approach to surface transport access to the airport within the airport boundary." The same proposition equally applies to Option 2 in cases of additional or replacement airport related car parking within the airport boundary.</p> <p>Secondly, it is recognised that a proportion of non-transfer passengers will choose to access the airport by private car in both options. To the extent that both options are required to accord with the Section 106 legal agreement, namely to provide sufficient but no more on-airport car parking spaces than necessary to achieve a combined on and off airport supply that is proportionate to 48% of non-transfer passengers choosing to use public transport for their journeys to and from the airport by 2024, means that the same provisions apply irrespective of whether the application is concerned with an on-airport or off-airport location. In short, the Section 106 legal agreement is not solely concerned with on-airport car parking spaces in terms of meeting public transport journeys.</p> <p>Thirdly, there is no evidence to justify the proposition that allowing airport related parking in off-airport locations either has or is likely to encourage users to access London Gatwick Airport by car and increase the number of trips and distance travelled by the vehicle to and from the airport. There is an distinct absence of</p>

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			<p>any research proving that a long term off-airport car parking use has prevented the modal share in favour of public transport at an airport from being reached, whether expressed as a target in an ASAS or in a Section 106 Planning Obligation. On the contrary, the 48% public transport target referred to in the Section 106 Planning Obligation was exceeded in the fourth quarter of 2017 in accordance with CAA's O & D Survey.</p> <p>It is contended that there are materially different forms of long term off-airport car parking. The traditional "park and ride" model involves a site with available reception facilities and compound areas where cars are blocked parked, with a courtesy mini bus or coach transferring the passengers to the airport terminals. The reverse occurs when the passenger returns, when they are picked up by the courtesy bus or coach and transferred back to the long term off-airport car parking facility to collect their car. The mini buses or coaches in such circumstances are normally replaced every three to four years, so there is the added benefit of the means of transportation relied on being the most efficient in terms of air quality and carbon emissions.</p> <p>This important factor however is not reflected in the scores where it relates to sustainability objectives 1 and 2. Fourthly, there is no justification to conclude that the provision of airport related parking in off-airport locations can detract from biodiversity and landscaping as a consequence of requiring hardstanding and lighting, and placing pressures on land which could be more beneficially used for other purposes.</p> <p>In both Options 1 and 2, the sustainability scores are identical, having a possible negative or slight negative impact, nullifying this statement. Whether the airport-related car parking is on-airport or off-airport necessitates hardstanding and lighting. Indeed, where there is a tightly drawn airport boundary as is the case with London Gatwick Airport, places pressure on land which could be more beneficially used for other airport-related activities. It is for these reasons that it is contended Option 2 does not amount to a "reasonable alternative".</p> <p>A more appropriate alternative would be what is referred to as Option X, which is the provision of additional or replacement airport related car parking within the airport boundary; along with airport related park-and-ride provision outside the airport boundary, which in the case of the latter, is justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport.</p> <p>In the case of Option X, it is contended that the sustainability objective scores would, at their worse, be no different from the sustainability scores set out in Option 1 of the SA/SEA relating to the Submission Consultation Draft May 2023, irrespective of whether a possible reassessment of sustainability objective 6 is undertaken. The importance of introducing Option X is that neither Option 1 nor Option 2 considers the impact of the Northern Runway proposal envisaged to take place during the period governed by CBLP 2024-2040. There is uncertainty surrounding the ability of GAL to provide sufficient on-airport car parking to cater for the increase in passenger throughput to the airport envisaged as part of the forthcoming DCO</p>

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			<p>application, irrespective of the intention of meeting a target of 60% of passenger journeys by sustainable modes and ultra-low or zero emission vehicles. The airport would find itself in particular difficulties in circumstances where lawful long term off-airport car parking sites were not available in providing a choice for airport passengers. In this regard reference should be made to a report published by the Civil Aviation Authority in December 2016 entitled "Review of Market Conditions for Surface Access at UK Airport – Final Report", which focused on two main topics:</p> <ul style="list-style-type: none"> • To understand the market structure for surface access, in particular how competitive conditions for road and forecourt access at individual UK airports affect outcomes for consumers. This included interaction between airport operators and surface access providers such as independent car parking operators, taxi/mini cab operator, bus operators and car hire operators; and • Transparency in terms of the extent to which consumers are well informed about the options they have to access UK airports and the prices for them. This included how surface access products and distributed. The report concluded: <ul style="list-style-type: none"> ○ Different passengers have different needs and preferences and not all modes will be perfect substitutes. Therefore, a situation where there is more than one competing provider of each mode, or at least the possibility of new entry would provide choice to passengers compared to a situation where passengers have to rely solely on competition between modes. ○ Some aspects of this sector may potentially give rise to risks to consumers in terms of choice and value for money. ○ Airport operators tend to control a large proportion of the facilities needed to run surface access operations, both at the forecourt and in surrounding areas (such as land suitable for car parks, surface transport interchanges, etc). Airport operators also provide many surface access products directly to consumers, often in competition with independent operators who require access to the airport's facilities. Airport operators are therefore active in both the provision of facilities (upstream) and in the service itself (downstream). ○ Surface access is one of the few areas where airport operators have a direct relationship with consumers. This may serve to strengthen the position of the airport operator, as passengers are less likely to have bargaining power that airlines and retailers who engage in commercial negotiations with airport operators. <p>The park-and-ride model has added benefits of resulting in fewer journeys to the airport, through taking advantage of low emissions vehicles, whilst at the same time reducing congestion on local roads near the airport and thereby improving air quality; compared with the case where the equivalent number of passengers relying on the private car would otherwise travel directly to London Gatwick Airport and then</p>

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			<p>park on-airport. This benefit occurs irrespective of whether the passenger's car is an ultra-low or zero emission vehicle.</p> <p>In addition, long term off-airport car parking operators make an important contribution to the economy through the provision of jobs. This "reasonable alternative" would rely on mitigation of the same negative impacts as Option 1 in the SA/SEA relating to the Submission Consultation Draft May 2023. It also takes into account that the planning system should be seen to operate in the public interest of local communities and the region as a whole, encompassing the present as well as future needs of society. It does not exist to protect the private interest in terms of one person against the activities of another, although private interest may coincide with the public interest in some cases.</p> <p>It follows there is a need to re-evaluate the SA/SEA relating to the CBLP 2024-2040 where it relates to Policy GAT3 and a re-appraisal of reasonable alternatives, if the same process is not to be considered unsound.</p> <p>Suggested Modifications: eA re-evaluation of the SA/SEA relating to the CBLP 2024-2040 where it relates to Policy GAT3 and a re-appraisal of reasonable alternatives with a new Option X as per attached letter dated 20th June 2023 from Tim North & Associates Ltd</p>
REP/055 (2023)	Gatwick Green Ltd (The Wilky Group)	Sustainability Appraisal & Strategic Environmental Assessment	<p>1.0 Introduction</p> <p>1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to the draft Sustainability Appraisal / Strategic Environmental Assessment¹ (SA/SEA), a legal requirement that supports the Draft Crawley Borough Local Plan, 2023 (DCBLP).</p> <p>1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation notes that the SA/SEA has been prepared in accordance with the advice in the Planning Practice Guidance (PPG), and that the outcomes of the evaluation of options in relation to</p>

¹ Crawley Borough Council Local Plan Review | Sustainability Appraisal / Strategic Environmental Assessment, Draft Report, For the Submission Local Plan, May2023

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			<p>Strategic Policies EC1 and EC4 and Policy GAT2 and other policies are the right outcomes and supported.</p> <p>2.0 Strategic Policy EC1</p> <p>2.1 The Council has assessed the alternative options for Strategic Policy EC1 in relation to addressing the unmet economic and employment land needs of the Borough in its Sustainability Appraisal (SA/SEA - pages 230-233). This evaluated three options: (1) rely on the NPPF to direct economic growth to the most appropriate and sustainable locations, (2) plan only for the level of need that can be accommodated within the main employment areas and work with neighbouring authorities to accommodate any unmet growth, and (3) adopt a spatial approach that recognises the role of Crawley as a sub-regional location and plan positively to meet economic growth needs by maximising the use of land in the existing employment areas, small extensions to Manor Royal and the allocation of Gatwick Green to meet Crawley's significant industrial and warehouse land requirements.</p> <p>2.2 Option 3 was selected as the most sustainable spatial option as it recognises Crawley as a key sub-regional centre and plans positively to meet its economic growth needs within the borough. The SA/SEA summarises the merits of Options 3 as follows (page 233): <i>"...the approach will enable Crawley to respond to market signals, planning for the specific sectors where growth is identified, and support continued economic recovery from the current economic recover from the Covid-19 pandemic. In identifying new business land, the approach will help to retain and attract business and investment, both to Crawley and the wider functional economic market area. In doing so, the approach responds to NPPF requirements to plan positively for economic growth, and reinforcing and strengthening Crawley's economic role, and that of the wider area."</i></p> <p>2.3 This analysis is reflected in Topic Paper 5² (Employment Needs and Land Supply, May 2023). The findings of the SA/SEA in relation to Strategic Policy EC1 are fully supported. The conclusions remain valid in the light of GGL's objections to Strategic Policy EC1 and the suggested change to identify a higher employment land need figure.</p> <p>3.0 Strategic Policy EC4</p> <p>3.1 The Council assessed the high-level alternative options in relation to Strategic Policy EC4 for providing for an Strategic Employment Location (SEL) (pages 238-239). This evaluated three options: (1) allocate a SEL only though Strategic Policy EC1, (2) allocate a SEL though a dedicated local plan policy that sets out the site-specific requirements for the site, and (3) explore the scope to allocate an industrial-led SEL through an Area Action Plan.</p>

² Topic Paper 5: Employment Needs and Land Supply, Crawley Borough Council, May 2023

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			<p>3.2 Option 2 was selected as it allowed for detailed matters relating to the amount and type of business floorspace, transport and access, design and amenity and environmental considerations to be addressed in policy and provide a framework to achieve a sustainable development through a masterplan and planning application. The Council's approach is supported in that it has allowed for the Gatwick Green SEL to be identified as part of the overall economic strategy for the Borough articulated in Strategic Policy EC1, with the detailed matters relating to site / development requirements to be addressed separately in a site-specific policy (Strategic Policy EC4).</p> <p>3.3 The findings of the SA/SEA in relation to Strategic Policy EC4 are fully supported. The conclusions remain valid in the light of GGL's objections to Strategic Policy EC4.</p> <p>4.0 Policy GAT2</p> <p>4.1 The Council has assessed the alternative options in relation to Safeguarded Land in its Sustainability Appraisal (SA/SEA) (pages 250-252). This evaluated three options: (1) safeguarding land as shown in the Gatwick Airport Master Plan³ (GAMP), (2) do not safeguard any land, and (3) safeguard land with an amended boundary to allow for strategic employment provision. Option 3 was selected as the most sustainable option as it responded to national policy to retain safeguarding, but with an amended boundary to accommodate Crawley's unmet employment land needs in the form of a SEL at Gatwick Green. This approach enabled land south of the airport required to accommodate the physical land take of a possible wide-spaced runway and its operations to be retained. The approach was based on the following analysis (page 252): <i>"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 and robotic 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. This approach, which retains safeguarding with an amended boundary to allow strategic employment provision, is considered to represent the most sustainable option"</i></p> <p>4.2 This analysis is reflected in Topic Paper 2 on Gatwick Airport⁴. The findings of the SA/SEA in relation to Strategic Policy GAT2 are fully supported.</p> <p>5.0 Other policies</p> <p>5.1 The SA/SEA also contains comparative evaluations of the options with regard to sustainable transport and infrastructure provision (Strategic Policies ST1 and IN1). In relation to these evaluations, the SA/SEA concluded in favour of locally-specific policies on sustainable transport and infrastructure over</p>

³ Gatwick Airport Master Plan 2019, Gatwick Airport Limited, xx 2019

⁴ Topic Paper 2, Gatwick Airport, Crawley Borough Council, May 2023

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			<p>relying on the NPPF (the 'do nothing' option). Both evaluations demonstrated significantly more benefits for a detailed locally-specific policy over the 'do nothing' option. On this basis, it is considered that there is an overwhelming and sound case in support of these policies.</p> <p>6.0 Conclusions 6.1 Overall, the SA/SEA is legally compliant and GGL supports the Council's findings with regard to Strategic Policies EC1, EC4, ST1 and IN1 and Policy GAT2</p> <p>Suggested Modifications:</p>
REP/058	Reigate & Banstead Council	SA	<p>Sustainability Appraisal / Strategic Environmental Assessment</p> <p>In our previous response (dated 30th June 2021) we expressed concern that the CBC draft Sustainability Appraisal ("SA") fails on the grounds of legal compliance. The Council determined that for the proposed allocation Gatwick Green, an option for not allocating land to meet the identified B8 need was not addressed. Having further assessed the most recent draft SA (May 2023), Appendix F: Submission Local Plan Spatial Strategy Options and Appraisal, we note that this has been addressed under the overarching spatial policy EC1: Sustainable Economic Growth. Option 1 is for the reliance on the NPPF to ensure that identified economic growth is directed to the most appropriate and sustainable locations. This is deemed as not directly allocating land and therefore we view this as addressing the option of not allocating land to meet B8 usage need. As a result, we would like to withdraw our previously written statement on the SA in our previous response and we no longer find any issues on legal compliance in this case.</p> <p>Suggested Modifications:</p>
REP/061 (2023)	Historic England	SA	<p>We commented separately on the scope of the Sustainability Appraisal by letter dated 27 February 2020 and reiterated our views in our letter 29 April 2021; we are content that the SA report for the Crawley Local Plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.</p> <p>Suggested Modifications:</p>
REP/062	Environment Agency	Sustainability Appraisal / SEA	<p>Draft Sustainability Appraisal/SEA</p> <p>The SA/SEA recognises that flood risk is one of the Sustainability issues facing Crawley. Section A11 highlights the nature of the flood risk within the Crawley Borough, and the importance of this constraints being recognised in the Local Plan is welcomed, as it the importance of flood risk continuing to remain so in planning for Crawley's future.</p> <p>Section A13 refers to the Strategic Flood Risk Assessment (SFRA). The SFRA is an important document in setting out the flood risk in the Borough and in outlining recommendations that should be considered in the identification of site allocations and the determining of planning applications. The current SFRA considers to</p>

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			<p>be fit for purpose, though by its very nature does represent a point in time. You should consider updating the SFRA when new information is available.</p> <p>Policies EP1, Development and Flood Risk, and EP2, Flood Risk Guidance for Householder Development and Minor Non-residential development, are related to how the flood risk in the Borough will be managed in terms of development planning.</p> <ul style="list-style-type: none"> • For Policy EP1, the choice of including a locally specific flood risk policy appears sound, as it better enables flood risk to be dealt with in a locally specific manner whilst strengthening the National Policy on development and flood risk. • For Policy EP2, the choice of including a specific policy detailing bespoke requirements for householder applications appears sound, as these types of application can result in a cumulative impact on flood risk though the nature and scale of supporting information should be proportionate to the development type. <p>Suggested Modifications:</p>
REP/113 (2023)	Natural England	SA/SEA	<p>Comments on local plan's Sustainability Appraisal (SA) We have no significant comments to make concerning your plan's SA.</p> <p>Suggested Modifications:</p>
REP/161	Resident 66	SA/SEA SDC1	<p>Adoption of BREEAM Standard instead of Passiv Haus standards of building BREEAM standards vary considerably between a 30% "Pass" to an 85% "Excellent". Nowhere does it specify the what level of BREEAM standard will be required. This conflicts with the Crawley Borough Council Climate Emergency Action Plan of 2021 which recommends Passiv Haus adoption. Passiv Haus standards are more specific and rigorous. They are also more limited in their breadth of cover.</p> <p>Suggested Modifications: Specify the minimum BREEAM standard. Also specify the use of the Passiv Haus standard.</p>

Habitat Regulations Assessment			
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REP/058	Reigate & Banstead Council	HRA	<p>Habitat Regulation Assessment</p> <p>We welcome the updated Habitat Regulation Assessment Report (January 2023) which builds upon the draft 2021 Report. We note that the Appropriate Assessment (“AA”) for the Mole Gap to Reigate Escarpment, Special Area of Conservation (“SAC”) for Air Quality and Water is complete. We previously raised concerns about the Nitrogen levels, and we note that the new AA explores the impacts to the SAC. Table 9.2 shows that: “The nitrogen deposition levels associated with emissions from traffic on the A217 from the Local Plan alone at roadside are between 0.44kg /N/ha/yr and 0.69kg /N/ha/yr at the closest point to the SAC”. This is said to be a slight increase in nitrogen deposition on the A217 (between 0.14 and 3kg N/ha/yr), whilst overall there is a reduction in the total level of nitrogen in the future scenarios. All the future scenarios modelled show an improvement in nitrogen deposition concentrations and the conclusion is that there is no Adverse Impact on Site Integrity (AIOSI). When considering water impacts too, it is stated that the Local Plan will have no AIOSI either alone or in combination at the Mole Gap to Reigate Escarpment SAC.</p> <p>Suggested Modifications:</p>
REP/066 (2023)	Mid Sussex District Council	Habitats Regulation Assessment	<p>Habitat Regulation Assessment:</p> <p>It is noted that a Habitat Regulation Assessment has now been prepared to support the Regulation 19 Plan which addresses this Council’s concerns raised in June 2021. Mid Sussex has no further comments on the HRA.</p> <p>Suggested Modifications:</p>
REP/113 (2023)	Natural England	HRA	<p>Comments on local plan’s Habitats Regulations Assessment (HRA)</p> <p>We concur with the conclusions of your local plan’s HRA and appropriate assessment insofar that the proposed local plan will have no adverse effects on the integrity of any internationally designated sites, either alone or in-combination.</p> <p>Suggested Modifications:</p>