

# Crawley Local Plan

## Draft Crawley Borough Local Plan 2023 ~~2024~~ – 2040 February 2024

For Modifications Submission ~~Publication~~ Consultation: 12 February – 25 March 2024

### Key to Modifications in document:

<u>Blue Text, Bold, Underlined:</u>	Main Modifications additional text to Submission Local Plan (May 2023) version
<del>Red, Strike-through Text:</del>	Main Modification Deleted text from Submission Local Plan (May 2023) version
<u>Green Text, Underlined:</u>	Additional (minor) Modifications additional text to Submission Local Plan (May 2023) version
<del>Grey, Strike-through Text:</del>	Additional (minor) Modification Deleted text from Submission Local Plan (May 2023) version





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## Foreword

Planning affects us all. The homes we live in, the places we work, the open spaces where we relax and the roads we travel on are all a result of planning decisions that have been made. Crawley Borough Council is revising the Local Plan in order to help to guide development in Crawley over the Plan period from ~~2023~~ 2024 – 2040.

To meet the needs of its growing population and its key economic role at the heart of the Gatwick Diamond, by 2040 Crawley would need to provide over 12,000 more homes, generating approximately 12,300 new jobs. In the past, Crawley's growth has mainly been through the creation of entire new neighbourhoods, and commercial development at Manor Royal. However, Forge Wood is the last full neighbourhood which can be built within the borough boundary as there is simply no space left. Most of the large sites have been built out on Manor Royal, with many having been redeveloped.

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

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

This document is the draft new Local Plan which the council considers to be legally compliant and 'sound', and is available for ~~full final~~ public consultation [on the proposed modifications as part of](#) ~~ahead of its submission to central government for~~ its independent examination.

I encourage you to respond.

Councillor Atif Nawaz  
Cabinet Member for Planning and Economic Development  
Crawley Borough Council



## Crawley's Local Plan

- 1.1 The draft Crawley Local Plan Review seeks to revise the current adopted Crawley 2030 Local Plan in order to update it in accordance with national policies and local changes. This will ensure Crawley maintains an up-to-date Local Plan to support and direct the growth of the borough. The Local Plan is an important document which sets the way forward for planning the future of Crawley – where we live, work and visit – for the next 16 years. The Crawley Borough Local Plan Review has involved engagement with residents, businesses and other stakeholders throughout its production. The Local Plan provides a clear indication of the council's approach to the development of the town, including helping to support the delivery of key priorities: wellbeing and communities, economic growth and social mobility, housing delivery and environmental sustainability.
- 1.2 This document forms the **Modifications Submission** draft Crawley Borough Local Plan and is published for public consultation. It contains the emerging draft strategic and non-strategic planning policies and principles to help shape the future of the town. Some of the Policies are proposed to be retained from the existing Local Plan, others have been changed, and some new policies are being proposed. All elements of the draft Local Plan are publicised for scrutiny and comment.
- 1.3 Once adopted, this Local Plan will replace the Crawley Borough Local Plan (2015 – 2030) to provide the basis for future planning decisions in the borough. It sets out the strategic priorities for Crawley and the planning policies to deliver:
  - Homes and jobs;
  - Provision of retail, leisure and other commercial development;
  - Provision of infrastructure for transport, telecommunications, water supply, wastewater, flood risk management, and energy;
  - Provision of community, social and cultural infrastructure and other local facilities;
  - Climate change mitigation and adaptation;
  - Conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure<sup>1</sup>; and
  - Control of Gatwick Airport.

### Current Stage of Consultation & Local Plan Timetable

- 1.4 This six-week period of public consultation ~~forms a third “Publication” stage of the preparation~~ **provides the opportunity for comment on the proposed modifications being considered as part of the Examination** of Crawley's Local Plan<sup>2</sup>. This forms the Local Plan the council considers to be its legally compliant and ‘Sound’<sup>3</sup> Plan for Submission to central government for its Independent Examination. The ~~Submission Draft~~ Local Plan sets the planning policies associated with the future development and potential growth of Crawley over the next 16 years.
- 1.5 The consultation runs from **12 February 2024** ~~9 May 2023~~ **until 5pm 25 March 2024** ~~20 June 2023~~.
- 1.6 Responses must be provided in writing and using the council's Response Form. This can either be in electronic format (via email to [strategic.planning@ Crawley.gov.uk](mailto:strategic.planning@ Crawley.gov.uk) **or through the council's website: [www.crawley.gov.uk/localplan](http://www.crawley.gov.uk/localplan)**) or by post to:

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<sup>1</sup> National Planning Policy Framework, paragraph 20 (2021) MHCLG

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

<sup>3</sup> This means the Plan is positively prepared, justified, effective and consistent with national planning policy (National Planning Policy Framework, paragraph 35, 2021, MHCLG)

Strategic Planning  
Crawley Borough Council  
Town Hall  
The Boulevard  
Crawley  
RH10 1UZ

1.7 The council's response form, which must be completed to make formal representations to the Local Plan, will be available for completion, or download, through the council's website: [www.crawley.gov.uk/localplan](http://www.crawley.gov.uk/localplan). Electronic copies are available to view at the Town Hall. You are invited to respond on the document as a whole, a specific topic area, a policy or a paragraph.

1.87 This document is considered to be a draft Local Plan Review. It follows a review of the existing adopted Local Plan, and does not seek to start from a blank page. In many cases, the principles and policies of the Crawley Borough Local Plan 2015 remain up-to-date and 'sound'. Therefore, for some topic areas, progress is well advanced and there may be little change proposed to the current approach. For other areas, the review has provided the opportunity for proposing a change or a new approach to be considered.

1.98 Following the close of consultation, all responses received will be collated and submitted to the Planning Inspectorate as part of the ~~Submission of the~~ [Local Plan's](#) for its independent examination.

1.109 The following timetable sets out details of the consultations and critical stages for the Local Plan's preparation.

Stage	Date
Early Engagement consultation	15 July 2019 – 16 September 2019
Publication (Submission) consultation	20 January – 2 March 2020
Additional Publication (Submission) consultation	6 January – 30 June 2021
Further Publication (Submission) consultation	9 May – 20 June 2023
Submission	July 2023
Examination in Public	<del>September – November 2023</del> <a href="#">– January 2024</a>
<a href="#">Modifications Consultation</a>	<a href="#">12 February 2024 – 25 March 2024</a>
Adoption	July 2024

Figure 1: Crawley Borough Local Plan Timetable

## Consultation Statement

- 1.10 A further stage of Publication (Submission) Consultation took place between May and June 2023. This followed a formal decision taken at Full Council in February 2023. In total, 67 individuals, business and organisations submitted formal representations to the Local Plan consultation.
- 1.11 An extended stage of Publication (Submission) Consultation took place between January and June 2021. This allowed for full consultation to take place on the Local Plan document as well as all of the evidence completed to advise the Local Plan in its preparation. This followed a formal decision taken at Full Council in December 2020. In total, 39 individuals and 45 business and organisations submitted formal representations to the Local Plan consultation.
- 1.12 An initial stage of Publication (Submission) Consultation took place between January and March 2020. The first Publication Consultation followed a formal decision taken at Full Council in December 2019. In total, 69 representors made formal representations on wide ranging matters. This stage was repeated due to updated evidence, changes in national policy and guidance from the Planning Inspectorate.
- 1.13 The responses received during both previous Publication consultations have been collated and published as part of the draft Local Plan Consultation Strategy. Where considered appropriate, matters raised have sought to be addressed through amendments to the Plan. These amendments are currently subject to further scrutiny as part of this formal public consultation.
- 1.14 All comments received as part of all three Regulation 19 “Publication” consultations (January – March 2020; January – June 2021 and the current consultation: May – June 2023) ~~will be~~ have been submitted in full to the Planning Inspector.
- 1.15 “Early Engagement” consultation took place between July and September 2019. This was a wide ranging consultation, using a variety of media and medium in order to generate debates regarding the future growth of Crawley and the emerging draft planning policies. Staffed exhibitions were held at different venues and at different times to engage residents, visitors and employees in Crawley, and forums were held with specific invitees from developers and businesses, and community groups. Officers attended meetings to promote the Plan and the consultation and receive feedback. In total, 210 representors provided comments, including 76 from the online and paper survey, 50 businesses, organisations, authorities and agencies, and local residents by email and attending the exhibitions. Full details of the consultation and all representations received, along with the council’s response detailing how the comments have been taken into account in preparing this Submission Version of the Plan are set out in the draft Local Plan Consultation Statement.
- 1.16 The ~~draft~~ Local Plan Consultation Statement sets out the full details of each of the previous consultations ~~along with this current Submission consultation.~~

### Preparation of Evidence Base

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

## Evidence Base

1.18 It is essential that, to meet the requirements set by national guidance, the Local Plan is underpinned by an adequate, up-to-date and relevant evidence base<sup>4</sup> about the economic, social and environmental characteristics, needs and prospects of the area. In light of this, new and updated studies have been carried out to ensure Crawley's Local Plan will reflect the locally distinctive issues, challenges, and opportunities, unique to the town. These include the following:

- **Deliverability of the Local Plan:** ~~draft~~ Sustainability Appraisal Report; an ~~draft~~ Infrastructure Plan; and an ~~updated~~ Viability Study.
- **Housing Needs:** Strategic Housing Market Assessment (SHMA); Strategic Housing Land Availability Assessment (SHLAA); Housing Trajectory; and Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment Review.
- **Employment Land Requirements:** Economic Growth Assessment (EGA) and update; Employment Land Availability Assessment; Employment Land Trajectory (ELT); and a Retail and Leisure Assessment and Town Centre Neighbourhood Needs Study.
- **Constraints and Assets:** Habitat Regulations Assessment (HRA); Strategic Flood Risk Assessment (SFRA); Baseline Character Assessment; Compact Residential Development Study; ASEQs and Locally Listed Buildings Heritage Assessment; Noise; Built-Up Area Boundary; Landscape Character Assessment; Historic Parks & Gardens Review; Green Infrastructure Plan; Transport Modelling; Eco-Serv Report; Playing Pitch Assessment, Indoor Sports Study and Open Space Study; updated Water Cycle Study; Heritage Assets Review; Crawley Western Link Road Study; and Water Neutrality Study.

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

### Sustainability Appraisal

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

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

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

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<sup>4</sup> National Planning Policy Framework, paragraph 31 (2021) MHCLG

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

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

1.23 A draft Sustainability Appraisal Report to support the Local Plan Review has been produced. This has been updated and published at each stage of Publication Consultation, to reflect the changes in the Local Plan. The Scoping Report was published and subject to formal consultation as part of the Early Engagement consultation alongside the Local Plan. The draft Sustainability Objectives are set out in Appendix A of this document along with the summary table of outcomes of the Local Plan Policy Sustainability Appraisal assessments.

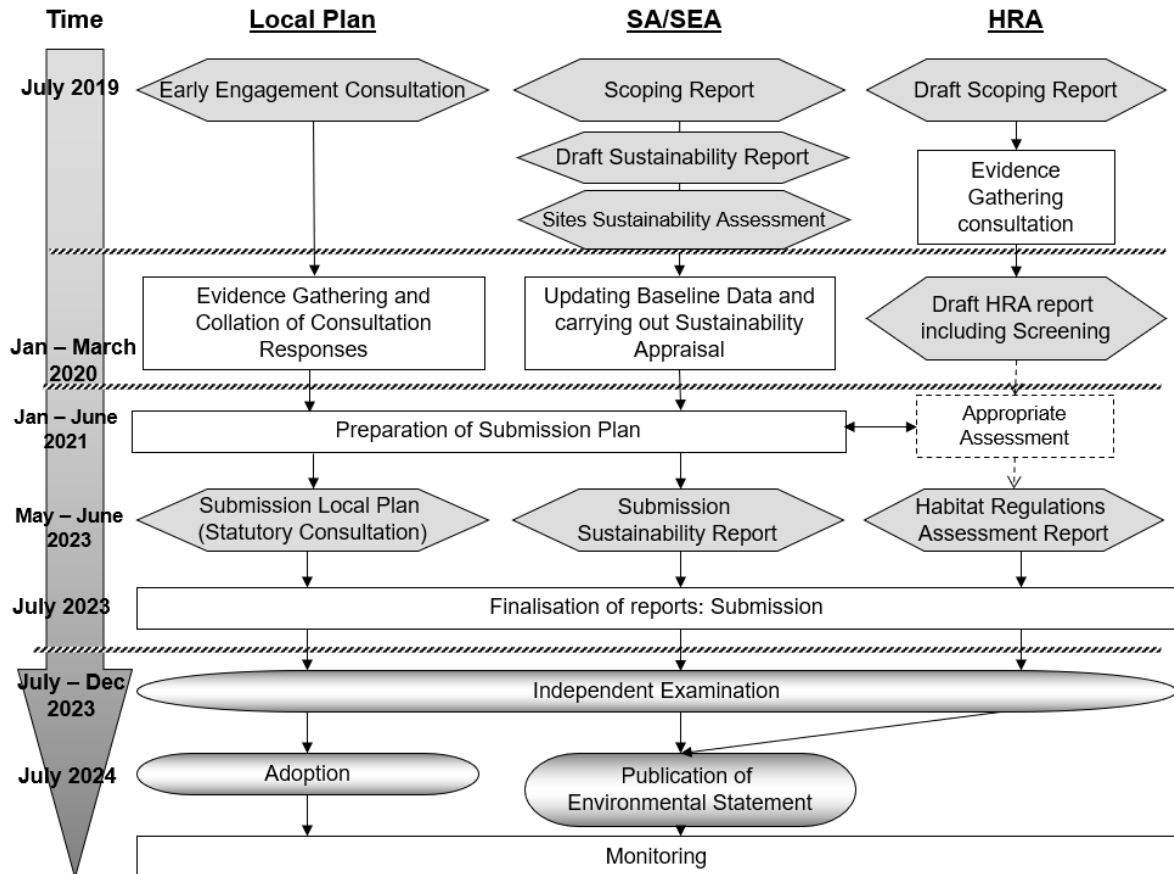


Figure 2: Timeline of Local Plan, Sustainability Appraisal and Habitats Regulations Assessment

### Infrastructure Plan

1.24 Local planning authorities are expected to work with other authorities and providers to assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk management, and its ability to meet forecast demands.

1.25 Crawley Borough Council has produced an draft Infrastructure Plan which has been agreed with the key infrastructure and service providers within Crawley to confirm capacity to meet the needs of the growth of the town anticipated through the Local Plan and highlight any mitigation required.

### Local Plan Map

1.26 Development allocations and protection designations related to the policies and proposals within this draft Local Plan and in the West Sussex Minerals and Waste Plans

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

### **Duty to Cooperate**

- 1.27 The Duty to Cooperate<sup>7</sup> establishes a need to plan for cross-boundary strategic issues, and places a requirement on planning authorities to work together on such issues.
- 1.28 The Duty applies to all local planning authorities, national park authorities and county councils in England, and to a number of other public bodies. The Duty:
- relates to development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council;
  - requires that councils set out planning policies to address such issues;
  - requires that councils and public bodies ‘engage constructively, actively and on an ongoing basis’ to develop strategic policies;
  - requires councils to consider joint approaches to plan making.
- 1.29 The NPPF provides further guidance on meeting the Duty to Co-operate in plan-making. Effective and on-going joint working should be demonstrated through the preparation and maintenance of Statements of Common Ground, documenting the cross-boundary matters being addressed and progress in cooperating to address them. These should be made publicly available throughout the plan-making process to provide transparency<sup>8</sup>.
- 1.30 The strategic issues relating to the future development of Crawley over the Local Plan period have been identified as including:
- Meeting housing needs
  - Economic growth
  - Gatwick Airport
  - Gypsy, Travellers and Travelling Showpeople
  - Key transport routes
  - High quality communications connectivity
  - Low carbon economy
  - Water resources
  - Flooding and flood risk.
- 1.31 These strategic issues are currently discussed beyond the borough’s administration in the following forms:
- Individual discussions on a one-to-one basis with neighbouring authorities.
  - Meetings at a Northern West Sussex Authorities level, with Mid Sussex District Council, Horsham District Council and West Sussex District Council; and commissioning joint evidence base such as the Strategic Housing Market Assessment and the Economic Growth Assessment.
  - Participating at a Gatwick Diamond level, with the Gatwick Diamond Authorities (crossing the County authority areas of West Sussex and Surrey). Jointly updating and signing up to the Gatwick Diamond Memorandum of Understanding and Local Strategic Statement.

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

<sup>8</sup> National Planning Policy Framework, paragraph 27 (2021) MHCLG



- 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.
  - Considering County-wide issues, through meeting with West Sussex and Greater Brighton Authorities at officer and member levels and participating in the preparations for a West Sussex and Greater Brighton Local Strategic Statement.
  - Involvement on a river basin management level in updating the Water Cycle Study evidence.
  - Meeting as Gatwick Airport Joint Local Authorities at officer and member level to share the current and future implications of Gatwick Airport operations and expansion plans.
  - Participating as a member of the Greater Brighton Economic Board.
  - Participating as a member of the Ashdown Forest Working Group in relation to Habitats Regulations Requirements associated with the Ashdown Forest Special Area of Conservation. Joint signatories to the Ashdown Forest Statement of Common Ground.
- 1.32 Effective cooperation with neighbouring authorities is critical for Crawley because of its primary economic role in the sub-region and the wider economic and environmental implications relating to Gatwick Airport. Equally, cooperation is essential as, due to its compact size, tight borough boundary around the urban area, significant physical constraints such as flooding and [National Landscape Area of Outstanding Natural Beauty](#), and restrictions due to airport noise and possible future expansion, Crawley cannot meet the housing and employment needs of its growing population within its own boundaries in full.
- 1.33 More detail on the Duty to Cooperate, the outcomes of joint working and the agreed series of Statements of Common Ground, and its influence on the Crawley Local Plan Review, form part of the Local Plan supporting documents.

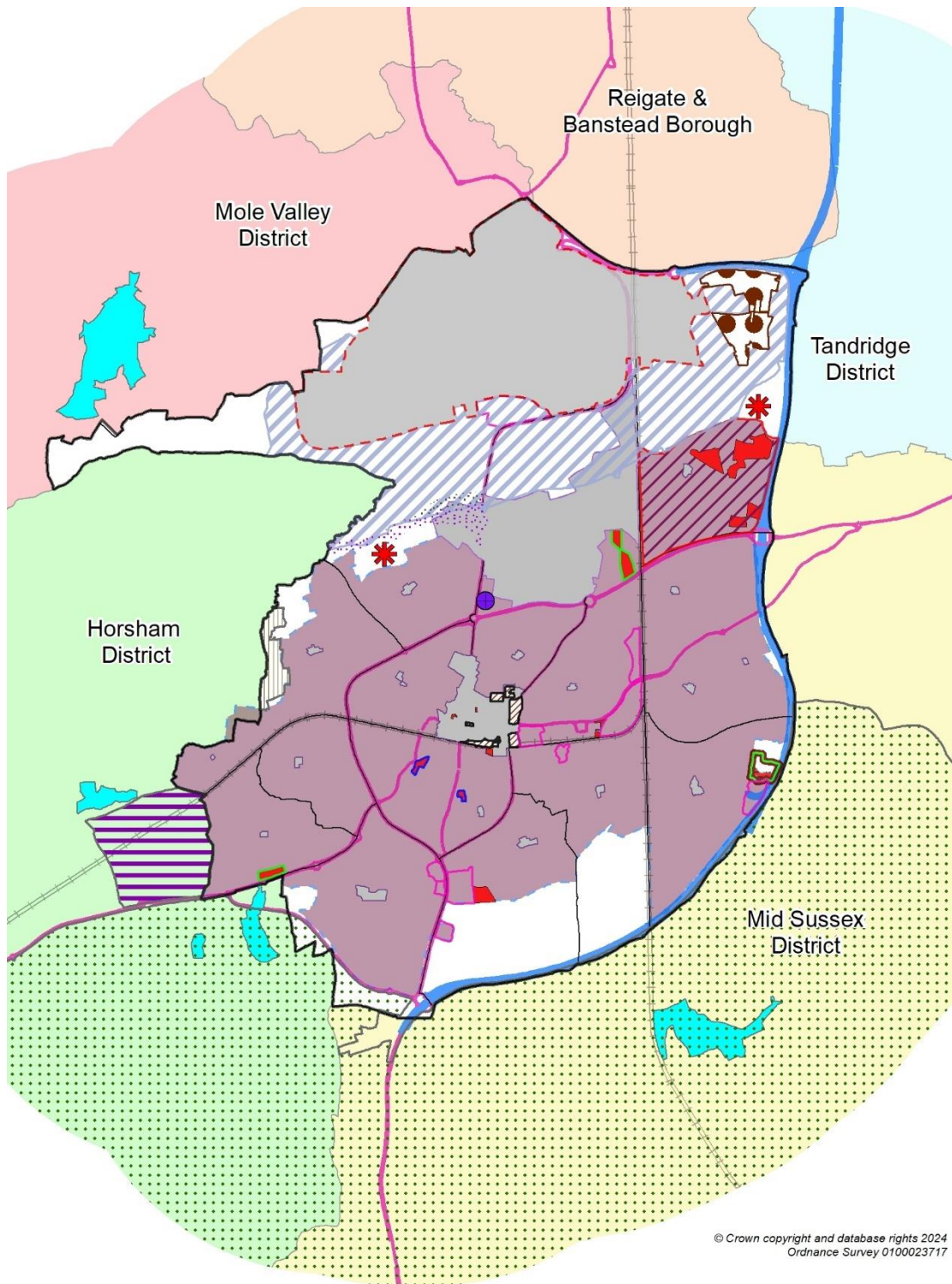
### **Monitoring & Review**

- 1.34 The draft Local Plan period [is 2023/24 to 2039/40, and](#) will cover [a minimum of 15 years following between](#) the anticipated adoption year of 2024 ~~and 2040~~. It will be prepared in order to be flexible and appropriate for ensuring delivery of sustainable development and economic growth throughout a range of economic and social cycles.
- 1.35 However, the Local Plan will be subject to continual monitoring to ensure the policies remain relevant and effective, and a review will be undertaken in 2029, at the latest, to ensure the Local Plan remains up-to-date, in accordance with the requirements of the NPPF. Should it be considered, at that stage, that a partial or full update of the Plan is required, this will be reported in the Authority's Monitoring Report and the timetable for this process will be established by the council's adopted Local Development Scheme.
- 1.36 In particular, should changes to national aviation policy allow for the removal of the safeguarding of all the land for Gatwick Airport expansion, the opportunities and constraints of this land will be considered comprehensively through a review of the Local Plan, rather than as piecemeal development.
- 1.37 In addition, should Southern Water implement a strategic, permanent alternative water supply for the Sussex North Water Resource Zone, the Local Plan's water neutrality requirements will be reviewed.

### Supporting Guidance Documents

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

# Key Diagram



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Ordnance Survey 0100023717

- |  |  |  |
|--|--|--|
| <ul style="list-style-type: none"> <li>— Crawley Borough Boundary</li> <li>■ Built-Up Area Boundary (Policy CL8)</li> <li>⋯ Area of Search for a Crawley Western Multi-Modal Transport Link (Policy ST4)</li> <li>⋯ Interim Area of Search for a Crawley Western Multi-Modal Transport Link (Policy ST4)</li> <li>■ Gatwick Airport Boundary (Policy EC1, EC2, GAT1, GAT3, GAT4)</li> <li>■ Gatwick Airport Safeguarded Land (Policy GAT2)</li> <li>■ Manor Royal (Policy EC1, EC2, EC3)</li> <li>■ Main Employment Area (Policy EC1 &amp; EC2)</li> <li>■ Strategic Employment Location (Policy EC1, EC2, EC4)</li> <li>■ Neighbourhood Centres (Policy EC12)</li> <li>■ Town Centre Boundary (Policy EC2, TC1-TC5, H2, H3c)</li> </ul> | <ul style="list-style-type: none"> <li>■ Forge Wood Neighbourhood (Policy H2)</li> <li>■ Key Housing Sites (Policy H2)</li> <li>● Indicative Key Housing Site (Policy H2)</li> <li>■ Biodiversity and Heritage Enhancements (Policy H2)</li> <li>■ Housing and Community Facilities (Policy H2)</li> <li>■ Housing and Open Space (Policy H2)</li> <li>■ Housing for Older People and those with Disabilities (Policy H2)</li> <li>■ Town Centre Key Opportunity Site (Policy TC3 and H2)</li> <li>● Broad Housing Locations (Policy H2)</li> <li>★ Area_of_Search_Future_Housing</li> <li>■ Kilnwood Vale (Joint Area Action Plan)</li> </ul> | <ul style="list-style-type: none"> <li>■ Sites of Special Scientific Interest (Policy GI2)</li> <li>■ Local Green Space (Policy GI4)</li> <li>■ High Weald Area of Outstanding Natural Beauty (Policy CL9)</li> <li>— A Road</li> <li>— Motorway</li> <li>— Railway</li> </ul> |
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# Crawley: A Vision

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

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

*By 2040, Crawley will be a place that people want to visit, to have fun and spend their leisure time. As a town within a countryside setting that is very much valued by local people, it will be safe and well cared for. The rich heritage which has shaped what the town is today will be respected, protected and enhanced.*

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

## Creating Stronger Communities: Diversity and Community

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

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

*As a progressive town, Crawley will strive to be the premier town between London and the South Coast providing jobs, learning and development opportunities and a leisure and cultural offer that is attractive to residents and visitors. Crawley will continue to be an economic leader, with a diverse, resilient and productive economy that meets the needs of the borough and 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.*

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

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

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

*By 2040, ~~5,030~~ **5,330** new homes will have been built to support the needs of the growing population. A mix of new homes will be designed for residents in all stages of life. These will be built in locations which respect the town's unique development and design principles and preserve the most valued of the town's environmental features.*

## Protecting the Environment: Sustainability

*By 2040, Crawley Borough Council will have eliminated net carbon dioxide emissions arising from council activities, helping to lead Crawley's progress towards becoming a carbon neutral town. Development will be water efficient, and water neutral where required, ensuring that new homes and economic growth can be delivered against the backdrop of serious water stress and without causing harm to protected designated sites. Crawley will be seen as a place where green growth is the driver of the economy and where green technology and businesses can thrive. Active travel and public transport will be significantly improved and supported by a road network that prioritises sustainable transport modes. Electric Vehicles will be promoted along with, and through, e-car clubs. A sustainable road network will be complemented by a good public transport system, giving people choice about how they travel. As a modern town, the technological and communication infrastructure will be in place to ensure residents and businesses have the support needed to develop and grow.*

*Conserving natural resources to support future growth will be vital to the longevity of the town. Air, noise and water pollution will be reduced. The borough will prepare for the increasing effects of climate change, through adaptation measures including lower water usage standards, including water neutrality where necessary, and delivering a net gain in biodiversity, and supporting nature recovery. Losses to protected and priority species and habitats will have been avoided and the delivery of vital ecosystem services, including pollination, flood alleviation and carbon capture, will have been enhanced in order to facilitate a sustainable and resilient future.*

## Crawley Borough Local Plan

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

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

### Spatial Context

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

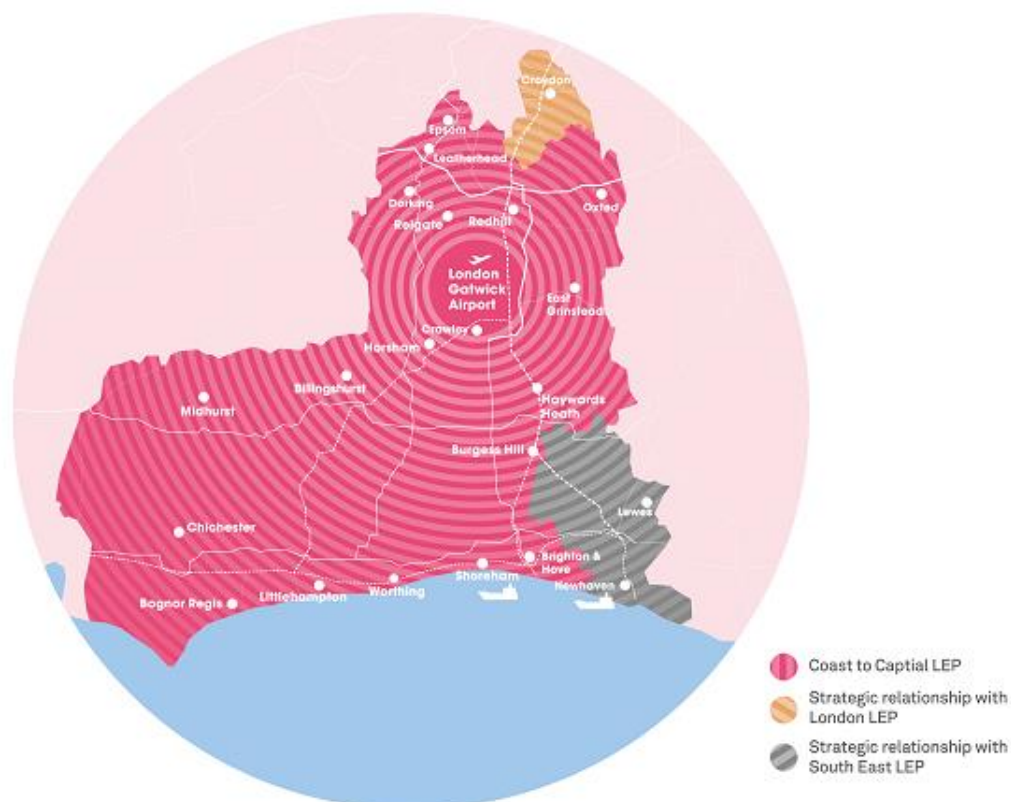
### Gatwick Diamond & Greater Brighton

- 2.5 Crawley is one of seven Local Authority areas forming the Gatwick Diamond (along with Epsom and Ewell, Horsham, Mid Sussex, Mole Valley, Reigate & Banstead and Tandridge). The Gatwick Diamond is home to the UK's fastest growing airport, 45,000 businesses and 500 international businesses, including many large multinationals. Its key sectors include medical engineering, aerospace and service industries. The area's economy performs well above the national average on a range of different economic indicators, such as its levels of productivity and share of high-skilled jobs. The Diamond extends over a range of towns and villages, set in attractive countryside, stretching from the southern edge of London to the northern boundaries of Brighton and Hove, and

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

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

forming the central element of the Coast to Capital Local Enterprise Partnership (LEP) area (see [Figure 3](#) Fig. 4 below).



**Figure 3: Crawley in the Context of the Coast to Capital Local Enterprise Partnership Area<sup>11</sup>**

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

**A New Town in a countryside setting**

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

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

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

- 2.10 The masterplan phased the development of the town through the addition of complete neighbourhoods, each with good access to its own centre offering a mix of uses to serve local needs. The relatively small size of each neighbourhood was intended to help build up the new communities, achieve closer integration and provide greater accessibility to the neighbourhood centres. In 2040, the principle of the neighbourhoods will remain a characteristic of the town, and neighbourhood centres will continue to play an important role as a focal point for community facilities and local shopping.
- 2.11 Crawley's urban and landscape structure consists of a number of distinct character components, such as:
- The Economic Centres (Crawley Town Centre, Manor Royal and Gatwick Airport);
  - The Historic Town of Crawley (the pre-'New Town' Crawley: including Medieval, Late Victorian, Edwardian development. In particular, these form the area stretching from, and including, Goffs Park/Ifield Road/St. Peters, east to, and including, the historic High Street area and Dyers Almshouses and south to include Brighton Road and Malthouse Road);
  - The Historic Villages (Ifield, Worth, Three Bridges);
  - The 1950s-70s 'New Town' Neighbourhoods;
  - The sylvan or wooded suburbs;
  - The places connected to open countryside (visually and physically) (wider Ifield along Rusper Road, beside Tilgate Park, Worth Village);
  - Areas of Open Parkland, Countryside and Meadows (Tilgate, Ifield Meadows, north of Manor Royal, Langley Green and Pound Hill/Forge Wood, Pease Pottage and the High Weald [National Landscape Area of Outstanding Natural Beauty](#)).
- 2.12 The management of change is necessary so as not to unduly restrict growth whilst retaining the valued features of the town. This will be achieved through the assessment of the character of the borough, the protection and enhancement of important and positive assets, improvements to areas with significant negative features and the delivery of high quality development that takes full account of its context.
- 2.13 The Local Plan ~~Review~~ continues to ensure the protection of other valued features of the natural and built environment, both within and around the town. New development will provide high quality environments and will be of a high standard of design and sustainable construction. The character of the countryside surrounding the town will be protected through the Local Plan by policies which set out the considerations for the land beyond the built-up area boundary.

#### [A working town](#)

- 2.14 Crawley is the largest economic centre in the Northern West Sussex Functional Economic Market Area<sup>12</sup>, and is also the largest economic area of the Gatwick Diamond, representing a significant proportion of its total commercial floorspace and employment. While Crawley boasts average salaries that are among the highest of the Gatwick Diamond, many Crawley residents are employed in lower paid jobs, and it is recognised that, on average, people who travel into Crawley for work earn more than people living in the borough. This is reflected in Crawley's resident workforce having an, on average, lower level of Qualifications at NVQ4 and above (36.9%) when compared to

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

the wider South East region (42.2%) and Great Britain (39.3%). Unemployment in Crawley has historically been low and the Local Universal Credit claimant count was at 2.8% in March 2020. This rose sharply during the Covid-19 pandemic, peaking at 8.9% in March 2021, reflecting the significant impacts felt by aviation-related employment sectors, but is now trending towards recovery with a claimant count of 3.7% in February 2023. Through the Crawley Employment and Skills Programme 2019-2024, positive steps are being made to address the skills gap and help Crawley residents to better access employment.

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

### **The Economic Centres**

#### **Manor Royal**

- 2.16 Manor Royal is one of the largest business parks in the south east, and a popular choice for a diverse range of occupiers. Covering a total of 240 hectares it is home to more than 600 businesses and over 30,000 jobs – accounting for 40% of Crawley's total employment. Manor Royal provides 77% of Crawley's total employment land; 19% of employment land in West Sussex; and 22% of employment land in the Gatwick Diamond. Since its official naming in 1950, Manor Royal has evolved and diversified over time, with its employment offer having shifted from its traditional manufacturing base to a broader range of office and industrial uses including a hub of medical engineering, aerospace and service industries. This notable size, scale and varied business base represent its key strengths. Moving forward, redevelopment and intensification of existing sites, and identification of appropriate extensions to Manor Royal will reinforce its vital economic function, supporting new and existing businesses as they grow. A focus on high quality design and the provision of improved and inspiring facilities for employees and visitors will further reinforce the status of Manor Royal as a premier business destination.

#### **Crawley Town Centre**

- 2.17 The Town Centre is a key component of Crawley's economic role in the sub-region, and plays a critical part in the Local Plan's development strategy. It is a sustainable location for main town centre uses including retail, office and leisure development that attract footfall and add to its vibrancy and vitality. It is also a sustainable location to live, and with a growing residential population, the Town Centre is increasingly becoming a neighbourhood in its own right, in turn requiring supporting facilities and services to meet the needs of the people that live there. The ambition is for the Town Centre to become a dynamic sustainable business growth hub with a bold and diverse retail and leisure offer, excellent public realm, high quality town centre living and a thriving evening economy.

#### **Gatwick Airport**

- 2.18 The economy of Crawley, and the wider Gatwick Diamond area, is buoyed by the presence of Gatwick Airport. 75% of Crawley's jobs (by employment numbers) is in distribution, hotels, transport, communications, banking and finance of which Gatwick Airport accounts for approximately 25,000 jobs directly. Crawley is the main place of residence for airport employees with 26.9% of the workforce living in Crawley. The Covid-19 pandemic had a major impact on the aviation sector, with passenger volumes



at Gatwick Airport falling by 78% between 2019 and 2020, this in turn impacting significantly on the Crawley economy. Since the end of pandemic restrictions, the airport has been on a path to recovery, with passenger volumes for 2022 (Q2) reaching 81% compared to pre-pandemic 2019 figures.

### **New Strategic Employment Location**

- 2.19 There remains an outstanding need for a minimum of ~~13.73~~ **17.93**ha new industrial-led employment land in Crawley, principally within the logistics and warehouse sectors. Therefore, a Strategic Employment Location is allocated at land East of Balcombe Road at Gatwick Green. This will meet Crawley's significant need for new industrial land, whilst helping maintain the economic diversity of Manor Royal and other main employment areas in Crawley.

### **Meeting housing needs**

- 2.20 Crawley's development as a New Town, in addition to the influence of Gatwick Airport, has significant implications for the future of the town in terms of population growth; and the need to accommodate development remains a key challenge for Crawley. By 2040, to meet the needs of its growing population, the town would need a further ~~12,080~~ **12,835**<sup>13</sup> new homes. Accommodating even some of this need involves difficult decisions and invariably places pressure on some of the key features that define Crawley's character.
- 2.21 Crawley's population profile is very different to most neighbouring areas and this places its own special demands upon the local economy and local services. The population reached 106,600 in 2011 (an increase of about 22% since 1991) and stands at 118,500 residents currently<sup>14</sup> (a further increase of 11% in the last decade). Crawley has a greater proportion of younger people (between the ages of 25 and 34) and a lower percentage of elderly, compared with the rest of the South East; with about two-thirds of Crawley's population less than 45 years of age. However, future demographic change particularly as the younger population have families will intensify demands upon the need for housing, along with social, community, leisure, educational and retail facilities. This is in clear contrast with the demographic challenges faced by many neighbouring districts. Furthermore, the ageing population is increasing at a disproportionately faster rate than other age groups, with growth of 65 years and over population accounting for 35% of the total projected change.
- 2.22 In line with national guidance, sufficient market and affordable housing should be provided to meet the needs of existing and future households across the housing market area as well as to provide an appropriate amount to sustain the local economy. However, this must be reconciled with the other priorities in the draft Local Plan, particularly those with regards to protection and enhancement of the built and natural environment, and meeting the objectives for future economic growth. The confined boundaries of the borough and the scarcity of land without physical and policy constraints makes the need to balance and plan for any growth particularly challenging.

### **Identification of Housing Sites in Crawley**

- 2.23 Crawley's identified land supply allows for around 42% of its housing needs to be met through new housing developments within the borough boundaries. Much of this is to be delivered through the completion of the Forge Wood neighbourhood in the north east

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<sup>13</sup> For the period from ~~2024~~ **2023** to 2040: 755 dwellings per annum x ~~17~~ **46** years, based on the Standard Methodology Figure 2014-based Household Projections, calculated March 2023.

<sup>14</sup> Census 2021

of the borough, and through residential development in the town centre<sup>15</sup>, with the remainder coming forward on a number of smaller sites within existing neighbourhoods.

- 2.24 Within the borough, the identification of housing sites has required consideration of all competing land use needs including open space and employment to ensure an appropriate balance has been struck in delivering sustainable development. The need to encourage increased densities to ensure the most effective use of land whilst maintaining character and amenity has been carefully addressed.
- 2.25 All sites, small/medium up to entire new neighbourhoods, contribute towards meeting housing requirements in Crawley, particularly as the land supply available within the administrative and urban boundaries of the town is becoming increasingly constrained. Nevertheless, as a New Town with a large stock of modern and generally well-designed and laid out housing, precedence for maintaining this standard has been set. All new housing and surroundings should be suitable in terms of size, design and facilities for the requirements of its occupants and should not lead to environmental and amenity problems.

### **Crawley's Unmet Housing Needs**

- 2.26 The scale of unmet need of approximately ~~7,050~~ **7,505** dwellings over the Plan period is fully acknowledged and is being discussed with neighbouring authorities in a constructive and effective manner, including across the Gatwick Diamond and West Sussex and Greater Brighton.
- 2.27 Crawley's housing market functions within a wider geographic area – identified as the Northern West Sussex Housing Market Area, which is predominantly within the local authority administrative areas of Crawley Borough, Horsham and Mid Sussex Districts; extending northwards into the administrative area of Reigate and Banstead Borough to a lesser degree. Taken as a whole, the towns within the Northern West Sussex Housing Market Area provide a complementary role, offering housing opportunities for the local population and workforce for each stage and socio-economic position within lifecycles, and providing housing for employees working at Gatwick Airport and Manor Royal. This highlights a critical inter-dependence and reliance between areas with regard to housing and economic growth.
- 2.28 In the preparation of the adopted Crawley Borough Local Plan 2015, it was recognised by the authorities across the Northern West Sussex Housing Market Area that Crawley had sought to fully maximise its capacity for housing development within the borough boundaries in order to meet its own housing needs<sup>16</sup>. Similarly, each authority within the area considered it was doing the maximum reasonable to meet the objectively assessed housing needs of the area as a whole, taking into account local constraints, local aspirations and the need for sustainable development<sup>17</sup>. Further acknowledgement is provided within the adopted Development Plans for Horsham, Mid Sussex and Reigate and Banstead: with recognition that their housing provision figures will contribute to meeting the wider needs of the Northern West Sussex Housing Market Area and supporting the delivery of economic growth within the Gatwick Diamond<sup>18</sup>.

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<sup>15</sup> A total of 2,871 dwellings to come forward within Forge Wood and the Town Centre combined (784 in Forge Wood + 2,087 in the town centre) out of the total net supply of 5,873 dwellings over 2021 – 2040 = 49%

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

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

<sup>18</sup> Reigate and Banstead Core Strategy, paragraph 7.4.1 – 7.4.4 (2013) Reigate and Banstead Borough Council; Horsham District Planning Framework, paragraph 6.3 (November 2015) Horsham District Council; Mid Sussex

2.29 However, the increase in projected annual household growth through the Standard Method (which includes 33% uplift for addressing affordability), and the additional ten years beyond the adopted Plan period (2030 – 2040) has increased the amount of unmet need to be addressed by the Local Plan Review. This is acknowledged to be increasingly challenging for the Housing Market Area, as the need figures for Mid Sussex and Horsham districts using the Standard Method are also significantly increasing (see table below). The Northern West Sussex Authorities continue to discuss housing delivery across the Housing Market Area as part of the Local Plan Reviews and ongoing Duty to Cooperate (see paragraphs 1.27-1.33 above)<sup>19</sup>.

	Crawley	Horsham	Mid Sussex	NWS HMA total
<b>Existing Local Plan Objectively Assessed Housing Needs</b>	675dpa	650dpa	876dpa	2,201dpa
<b>Existing Local Plan Requirements</b>	340dpa	800dpa	964dpa	2,104dpa
<b>Standard Method Requirement<sup>20</sup></b>	755dpa	911dpa	1,090dpa	2,756dpa

Figure 4: Northern West Sussex Housing Needs

### Development adjacent to Crawley

- 2.30 Delivery of homes in new neighbourhoods in close proximity to Crawley is an appropriate way to meet the needs of the emerging households from within the existing population, and joint working has been long established in recognition of this. This has included the Joint Area Action Plan prepared and adopted by Crawley Borough and Horsham District Councils in 2009 for West of Bewbush which is seeing the current delivery of the new Kilnwood Vale neighbourhood, immediately adjacent to Crawley’s boundary whilst being located wholly within Horsham District. The identification of a Strategic Development Location to the West and North West of Crawley for 2,500 homes was set out in the West Sussex Structure Plan. Kilnwood Vale was subsequently determined as the most appropriate location to take forward following detailed assessments of the opportunities and constraints for providing a new neighbourhood and development potential around all of Crawley’s boundaries<sup>21</sup>.
- 2.31 In addition to Kilnwood Vale, the new neighbourhood within Crawley’s administrative boundaries (Forge Wood) and the new neighbourhood level extensions to Horley (within Reigate and Banstead administrative boundaries) are being progressed. Further significant level of development is permitted, and taking place, to the east of Crawley’s administrative boundaries at land west of Cophorne, to the west along Rusper Road and to the south, in the [High Weald National Landscape Area of Outstanding Natural Beauty](#), at Pease Pottage. The development coming forward adjacent to the borough’s administrative boundary, is shown on the map below ([Figure 5 Fig. 2](#)).
- 2.32 Other potential urban extensions to Crawley may include extensions to the east and/or west of the borough boundary. All opportunities are being explored to understand whether these would constitute the most sustainable housing development locations in the context of the wider housing market area and travel to work area and whether the existing infrastructure, and environmental constraints can be resolved.
- 2.33 This map should not be considered as an indicator of the extent of acceptable development adjacent to Crawley. Many physical, environmental and policy

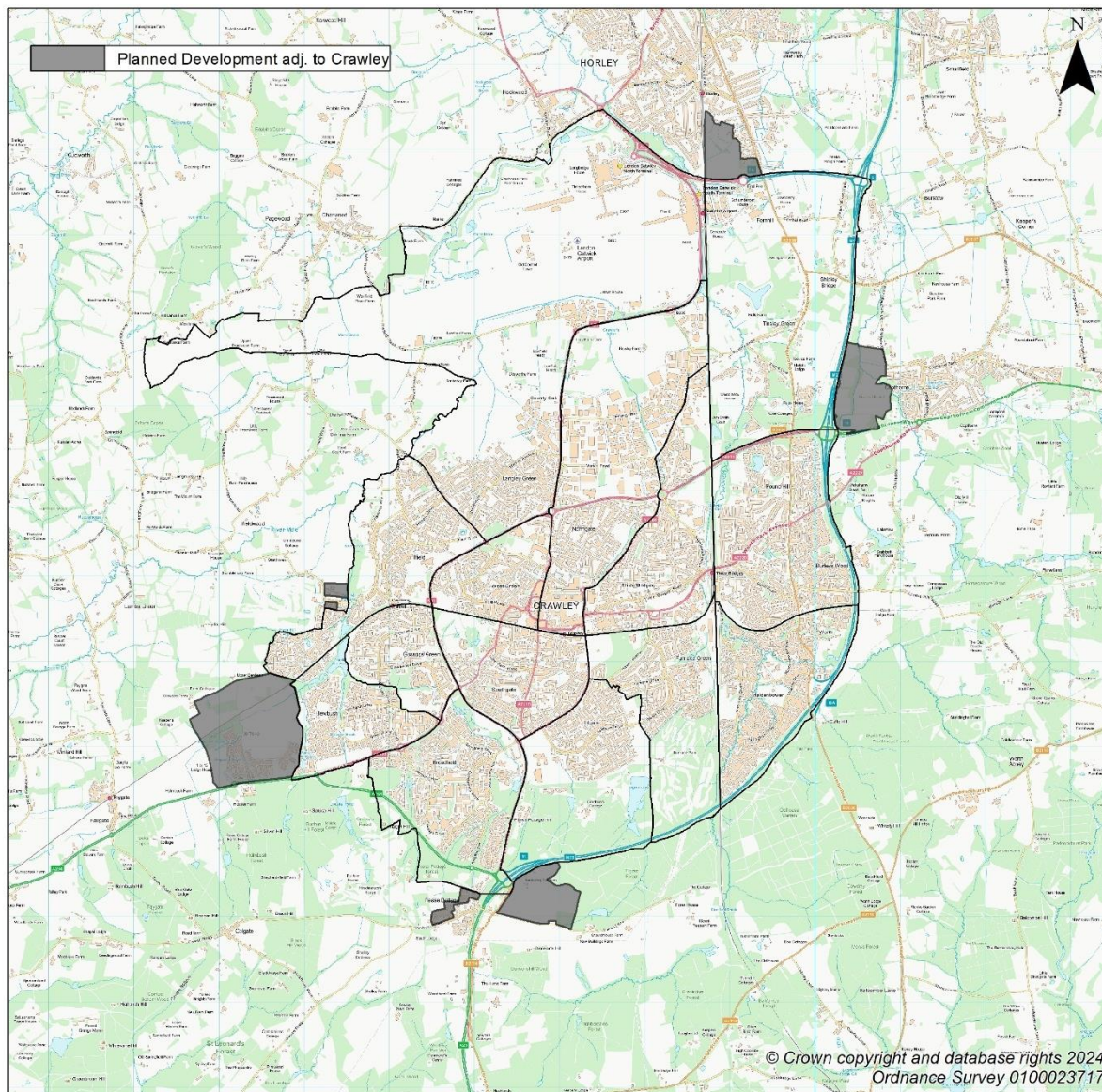
District Plan 2014 – 2031, Policy DP4: Housing, second paragraph, page 30, and Policy DP5: Planning to Meet Future Housing Need, pages 33-34 (March 2018) Mid Sussex District Council

<sup>19</sup> Northern West Sussex Authorities Statement of Common Ground, Agreements 2, 3 and 4 (May 2020), Crawley Borough Council, Horsham District Council, Mid Sussex District Council and West Sussex County Council

<sup>20</sup> 2014-based Household Projections; affordability ratio ONS 2023

<sup>21</sup> At Crawley Study (2009) GL Hearn

designations apply to these areas, including Green Belt, [National Landscape Area of Outstanding Natural Beauty](#), Ancient Woodland and Sites of Special Scientific Interest. The planning policies of the neighbouring authorities will apply in cases of development outside of Crawley's administrative boundaries. However, it illustrates the locations of current developments taking place close to Crawley which will have implications for, and impacts on, Crawley's infrastructure and setting.



**Figure 5: Planned Development Adjacent to Crawley**

### Environmental sustainability

2.34 Crawley borough has some unique characteristics and opportunities that enable the delivery of a clear approach to mitigation against, and adapting for a changing climate, whilst positively embracing the borough's ambitious targets of being carbon neutral by 2050, while achieving net zero greenhouse gas emissions from council activities by 2040 at the latest<sup>22</sup>. This uniqueness arises from the density of the urban area, the level of anticipated development and the clearly identifiable opportunity areas such as the

<sup>22</sup> Climate Emergency Declaration' (2019) CBC; 'Amending the targets within the Climate Emergency Action Plan' (2021) CBC

Manor Royal business district, the town centre redevelopment areas and Gatwick Airport. The borough is identified as an area of high radiant energy.

- 2.35 The entire borough is subject to serious water stress, whilst much of it falls within the Sussex North Water Resource Zone and is also subject to supply constraints posed by water neutrality. In a high density, growing urban area, water resources and water quality should both be addressed. As more water is required, less is available for ecosystems, more wastewater is produced, which may ultimately affect the aquatic environment. This means that ambitious policies are required to ensure that growth is planned sustainably with the water environment in mind.
- 2.36 The borough's Green Infrastructure Network is critical to provide connective ecological network opportunities through the urban area, for biodiversity and human mental and physical health benefits. This connects beyond the borough's boundaries to the wider countryside located mainly within the neighbouring authority areas. Ongoing partnership working<sup>23</sup> will continue to maximise opportunities to conserve and enhance the green infrastructure network across boundaries.
- 2.37 As a result of this, there are several areas where the planning system can build upon nationally described standards to ensure that the borough's potential to adapt and mitigate against the effects of climate change is maximised. These are fundamental to the priority objectives for Crawley to 2040 and to the most significant elements of the town's locally distinctive context.
- 2.38 The priority areas are:
1. Ensuring new buildings are low carbon;
  2. Bringing forward district energy networks;
  3. Addressing serious water stress and achieving water neutrality where this is required;
  4. Promoting public transport and active travel;
  5. Protecting and enhancing the Green Infrastructure Network in terms of connectivity, accessibility and net gain in biodiversity, including water quality.

#### Accessible transportation links

- 2.39 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, and a network of green corridors, providing attractive pedestrian and cycle routes through the neighbourhoods and into the town centre and out into the countryside. The National Cycle Route 21, from Greenwich to Eastbourne and forming part of the "Avenue Verte" Greenway, linking London to Paris, also runs through the borough.
- 2.40 Attractive and effective public transport is essential in order to facilitate and encourage a shift to sustainable modes of transport. In order to make effective use of land, the identification and delivery of improved public transport needs to be focused on optimal routes and connecting the higher density neighbourhoods to Crawley's three primary economic centres and its two regional transport nodes: Three Bridges station and Gatwick Airport and its station. This will help to provide a viable, dependable and sustainable transport alternative. Together with promoting active travel, cycling and walking, this will lead to reduced carbon emissions, improved air quality, and a

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<sup>23</sup> Including as part of the Sussex authorities in partnership with the Sussex Biodiversity Record Centre; the Gatwick Diamond Authorities; Gatwick Greenspace Partnership; and through individual cross-boundary discussions on site-specific matters.

reduction in traffic volumes and the borough's over-dependence and reliance on private vehicles for getting around.

- 2.41 All new development will be planned to maximise links in the transport network and opportunities for all forms of sustainable transport. A key priority area for the Plan period will be to build upon and improve the dependability, frequency, capacity and speed of the Fastway service in key areas of the borough, in order to encourage a viable and attractive alternative to car use, both for commuters, residents and visitors.

### **Planning Policy Context**

#### National Planning Policy Framework

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

#### Gatwick Diamond Local Strategic Statement

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

#### Crawley Borough Council Corporate Priorities

- 2.45 The corporate priorities (2023 to 2027) set out the council's strategic direction over the medium-term. The priorities consist of six key headline priority objectives which are underpinned by 24 objectives, projects and initiatives. The six priorities are:
- Delivering value for money and modernising the way we work;
  - Delivering affordable homes for Crawley and addressing homelessness;
  - Enabling a sustainable economic recovery and improving local job opportunities;
  - Reconnecting communities;
  - Providing high quality leisure and culture facilities and supporting health and wellbeing services;
  - Protecting the environment.
- 2.46 Planning within Crawley can affect and influence a number of these priorities. To reflect this, the overarching Local Plan Chapter 'Sustainable Development' addresses these priorities in its strategic policies (Presumption in Favour of Sustainable Development and Enabling Healthy Lifestyles and Wellbeing).
- 2.47 The subsequent structure of the Crawley Borough Local Plan ~~2024~~ **2023**-2040 then follows the Corporate Priorities:

#### **1. Wellbeing & Communities**

- Corporate Priorities: Reconnecting communities & Providing high quality leisure and culture facilities and supporting health and wellbeing services.
- Local Plan Chapters: Character, Landscape & Development Form; Design & Development Requirements; Heritage; Open Space, Sport & Recreation; and Infrastructure Provision.

## 2. Economic Growth & Social Mobility

- Corporate Priority: Enabling a sustainable economic recovery and improving local job opportunities.
- Local Plan Chapters: Economic Growth; Gatwick Airport; and Crawley Town Centre.

## 3. Housing

- Corporate Priorities: Delivering affordable homes for Crawley and addressing homelessness.
- Local Plan Chapters: Housing Delivery; and Meeting Housing Needs.

## 4. Environmental Sustainability

- Corporate Priorities: Protecting the environment.
- Local Plan Chapters: Green Infrastructure & Biodiversity; Sustainable Design & Construction; Environmental Protection; and Sustainable Transport.

### Crawley Economic Development and Regeneration Programmes

- 2.48 Located at the heart of the Gatwick Diamond, Crawley is the major economic driver for the region. Through its Economic Development and Regeneration Programmes, the ambition is to create a dynamic business growth hub with a bold and vibrant community heart for Crawley and the Gatwick Diamond, driving a diverse sustainable economy through strong and adaptive business, commercial and leisure offer, excellent public realm, sustainable transport infrastructure, high quality town centre living and a thriving evening economy.
- 2.49 Through the Crawley Growth Programme, an investment package of £31.412 million has been secured, funded by the Coast to Capital Local Enterprise Partnership (LEP), West Sussex County Council and Crawley Borough Council. This is delivering a range of infrastructure improvements and physical regeneration in the town centre, Manor Royal and Gatwick, designed to support significant increases in new homes, business investment and employment growth. The whole programme will deliver 7,000 new jobs, 135,000 square metres of refurbished commercial floor space and 1,000 new homes. Forming part of this work, the Town Centre Regeneration Programme has secured £15.4 million investment from the Coast to Capital LEP and £21.1 million from the Towns Fund. This has already delivered significant improvements to Queens Square, Queensway, and Eastern Gateway, accompanying the construction of a new town hall, new Grade A business space and high quality residential accommodation, along with major improvements to the public space and road networks. Further investment is to come through regeneration of Three Bridges Station and Crawley Station Gateway, including the bus station. Significant work is also being undertaken through the Crawley Employment and Skills Programme (2019-2024), focused on bridging the local skills gaps by working with partners to create the right conditions for career opportunities within the borough.
- 2.50 Crawley's economy was badly affected by the Covid-19 pandemic, with the majority of town centre businesses having to close during periods of lockdown and restrictions, and impacted during this time by a dramatic fall in visitor numbers, and the negative impact of furlough and home-working. In response, the council has led efforts to boost

the town centre economy and generate new business investment and jobs by continuing to lead and facilitate the development of major programmes of new infrastructure, amenity improvements and residential development. In December 2021, Crawley Borough Council published its 'One Town' Economic Recovery Plan; an overarching, strategic plan for all existing delivery programmes including Crawley Growth Programme and the Town Centre Regeneration Programme. The Crawley Economic Recovery Plan presents a vision for the borough's future socio-economic prosperity, supporting continued economic recovery through a series of flagship interventions. This includes the 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, supporting a green economy, skills development and town centre renewal.

#### Net Zero Carbon Commitment

- 2.51 Crawley Borough Council declared a Climate Emergency by a unanimous vote at Full Council on 17 July 2019. This pledged to reduce carbon emissions generated by Crawley Borough Council activities by at least 45% by 2030 and to zero by 2050 as recommended by the Inter-governmental Panel on Climate Change (IPPC). On 15 December 2021 Full Council unanimously passed a further resolution amending these targets so as 'to pledge to reduce carbon emissions by at least 50%, and as close to net zero as possible by 2030, and to reach net zero by 2040 as the very latest.'<sup>24</sup>
- 2.52 This improves the Crawley Carbon and Waste Reduction Strategy (adopted 2012) which aims to make Crawley carbon neutral and zero waste by 2050, by focusing on the council:
- being a role model for sustainability within its own buildings and in its service delivery; and
  - working in partnership to help residents and other organisations to limit their own carbon emissions and waste.
- 2.53 The key strategic objectives and aims which are related to the planning system and the priorities and policies in the Local Plan are as follows:
- Low carbon, decentralised energy network for the town:
    - work in partnership with energy service companies, property owners and other partners with the aim of delivering combined heat and power schemes where possible.
  - Promote sustainable housing and transport within Crawley:
    - Investigate opportunities, in partnership with West Sussex County Council;
    - Set an example with the council's own social housing stock;
    - Significantly increase the number of residents walking, cycling and using public transport for more every-day journeys.

#### Crawley Transport Strategy: New Directions for Crawley 2020

- 2.54 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.

#### West Sussex Local Transport Plan 2022

- 2.55 The Crawley Transport Strategy is set within the context of the West Sussex Local Transport Plan which establishes a vision for a transport network achieving net zero

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<sup>24</sup> Climate Emergency Declaration' (2019) CBC; 'Amending the targets within the Climate Emergency Action Plan' (2021) CBC



carbon emissions by 2050 through more local living, increased use of electric vehicles and reduced fossil-fuels. It will also be safer, more efficient and resilient with more active travel and public transport, and transport impacts such as air pollution, noise and rat-running will be minimised. The West Sussex Transport Plan transport strategy for Crawley is intended to support the delivery of 'New Directions' by ensuring active travel modes and shared transport services are attractive options in all areas of the town, including the provision of bus and active travel priority measures, the upgrading of bus and railway public transport interchanges and the delivery of cycle routes. The Transport Plan also sets out a vision for a Crawley Western Link Road, stating it has potential to support strategic and economic growth in Crawley and Horsham.

- 2.56 The government's Cycle and Walking Investment Strategy was published in 2017, with the aim to double the numbers of cycling trips and significantly increase walking by 2025. Reflecting this, a Crawley Local Cycle and Walking Infrastructure Plan (LCWIP) has been adopted.

#### West Sussex Waste Local Plan 2014 and Joint Minerals Local Plan 2018 (Partial Review 2021)

2.57 The West Sussex Waste Local Plan covers the period to 2031 and is the most up-to-date statement of land use planning policy for waste. The West Sussex Joint Minerals Local Plan 2018 (partially reviewed 2021) covers the period to 2033 and provides guidance on how the safeguarding of minerals resources and infrastructure associated with minerals supply and waste management will take place in West Sussex (for example, wharves, railheads, processing plants). The documents provide the basis for making consistent decisions about planning applications for waste and mineral activities in West Sussex. As required by national policy and West Sussex County Council, the Local Plan Map displays the safeguarded railheads and Brick Clay Resource Consultation Area.

#### Neighbourhood Plans

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

# Sustainable Development

## Presumption in Favour of Sustainable Development

- 3.1 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development<sup>25</sup>, and sets out the planning system's role in supporting the three dimensions of sustainable development:
- **An economic objective:** to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
  - **A social objective:** to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
  - **An environmental objective:** to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

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

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

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

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

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

<sup>25</sup> National Planning Policy Framework, paragraph 8 (2021) MHCLG

### **Reasoned Justification:**

- 3.2 *Taken as a whole, the principles and policies set out in this Local Plan for Crawley will deliver the sustainable development of the town and will guide development proposals to meet the long-term vision as well as maximising short-term benefits. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that guide how the presumption should be applied locally.*
- 3.3 *This must be achieved having regard to the limited availability of developable land in Crawley, which is a result of the borough's tight administrative borough boundary and constraints including flooding and aircraft noise. This means that the Local Plan must strike a considered balance between conflicting demands to meet Crawley's significant housing, employment, and open space needs in a sustainable manner. To ensure this is the case, Policy SD1 provides the overarching principles on meeting the presumption in favour of sustainable development.*
- 3.4 *In accordance with the NPPF, the presumption in favour of sustainable development applies unless specific policies indicate development should be restricted. Those sites with strongest weight against development<sup>26</sup> will include land designated as Local Green Space, [National Landscape Area of Outstanding Natural Beauty](#), designated heritage assets (including Listed Buildings, Conservation Areas, Scheduled Ancient Monuments and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to scheduled monuments), locations at risk of flooding and irreplaceable habitats, such as areas of Ancient Woodland and ancient and aged trees<sup>27</sup>. Other constraints which have been locally assessed within Crawley include areas subject to unacceptable levels of noise, particularly from aircraft; historic parks and gardens; Local Wildlife Sites; structural landscaping; and open space which has not been identified as surplus to open space requirements. Development within these locations will be considered carefully against the reasons for their designation and will only be approved if mitigation measures can adequately reduce the negative impacts of development.*
- 3.5 *To ensure development is truly sustainable and supports the needs of economic growth within such a constrained and tightly drawn urban borough, it is essential for Crawley to be considered in its wider geographical context, including its housing market and travel to work areas, rather than restricted to its administrative boundaries, and for continued cooperative working to ensure the most appropriate balance is struck.*

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

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

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<sup>26</sup> National Planning Policy Framework, paragraph 11 and footnote 6 (2021) MHCLG

<sup>27</sup> National Planning Policy Framework, glossary definition "Irreplaceable habitat", page 68 (2021) MHCLG

3.8 To aid understanding of the built and natural environment and health, researchers<sup>28</sup> have devised the Health Map (Figure 6). The map is focused on the role of neighbourhood and planning, and emphasises the importance of the built and natural environment’s contribution to health and wellbeing outcomes, in line with the socio-ecological approach to health (Orme et al., 2010).

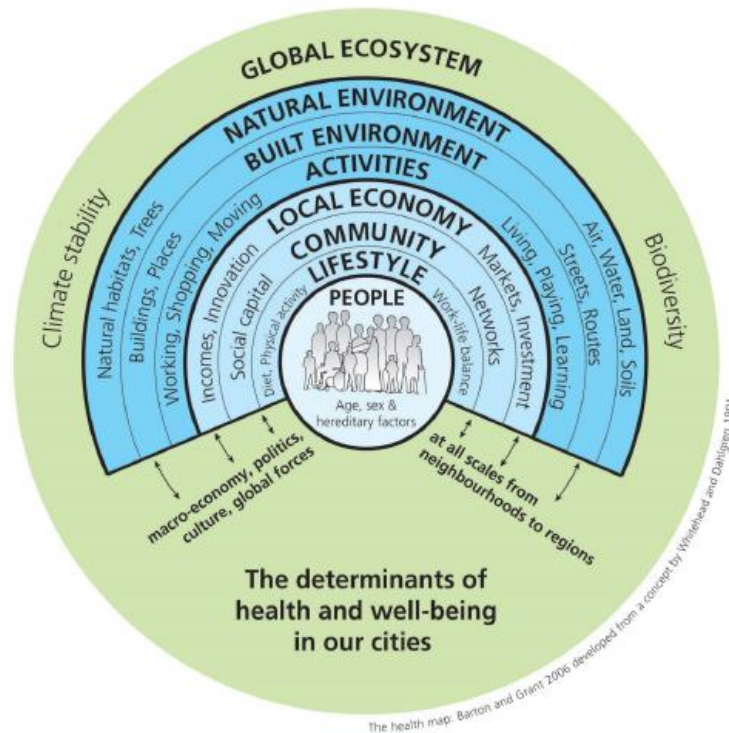


Figure 6: Barton and Grant Health Map

3.9 Therefore, planning for health involves thinking about the interrelated factors that affect health, including social and psychological elements, such as wellbeing and fulfilment. The wider determinants of health are conditions in which people are born, grow, work, live and age, and the wider set of forces and systems shaping the conditions of daily life. A healthy place is one that can contribute to the prevention of ill health and provide the environmental conditions to support positive health and wellbeing.

3.10 When considering the health impact of individual developments, it is important that its surroundings are taken into account as well as its intended purpose. This includes looking at population health as a whole. It also involves the examination of population groups, vulnerable communities and sensitive uses, such as residential care homes, supported housing, schools, hospitals and health centres.

3.11 Public Health England has noted that “Some of the UK’s most pressing health challenges – such as obesity, mental health issues, physical inactivity and the needs of an ageing population – can all be influenced by the quality of our built and natural environment”. The considerate design of spaces and places can help to promote good health by providing:

- **Healthy lifestyles:** places to access good diet, nutrition, opportunities to breastfeed, take part in physical activity, minimise risk taking and addictive behaviour such as gambling, alcohol and smoking.

<sup>28</sup> Barton and Grant (2006), drawing upon the work of Dahlgren and Whitehead (1991)

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

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

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

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

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

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

### **Reasoned Justification**

- 3.12 *National planning policy confirms that planning policies and decisions should aim to achieve healthy, inclusive and safe places which: promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy and safe pedestrian and cycle connections within and between neighbourhoods, and active street frontages<sup>29</sup>.*
- 3.13 *To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*
- *Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments<sup>30</sup>;*
  - *Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*
  - *Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to day needs.*
- 3.14 *The Health and Social Care Act (2012) sets out local authorities’ duties and responsibilities for health improvement and health protection. The Act requires every local authority to use the levers at its disposal to improve health and wellbeing. Through the Sustainability Appraisal, the health impacts of the Local Plan are assessed against the identified issues. The benefits and outcomes of the implementation of the Plan will be monitored annually against these indicators through the Authority’s Monitoring Report.*
- 3.15 *Planning for health involves thinking about the interrelated factors that affect health, including social and psychological elements, such as wellbeing and fulfilment. The wider determinants of health are conditions in which people are born, grow, work, live and age, and the wider set of forces and systems shaping the conditions of daily life. A healthy place is one that can contribute to the prevention of ill health and provide the environmental conditions to support positive health and wellbeing.*
- 3.16 *The West Sussex Joint Strategic Needs Assessment (JSNA) “People and Places” for Crawley (2019)<sup>31</sup>, highlighted the following characteristics to consider:*
- *There has been a 10% increase in residents since 2007, due both to more births than deaths and inward migration;*
  - *133,425 people were registered with Crawley CCG GP practices in 2017/18 (more than the 111,700 total residents within the borough);*
  - *The resident population has a younger profile compared with England with 22% aged 0-15 years and only 13% aged 65+ years, although the numbers of the elderly population are increasing;*
  - *28% of the local population were from black and minority ethnic (BAME) groups at the time of the 2011 census, higher than England;*

<sup>29</sup> National Planning Policy Framework, paragraph 92a) (2021) MHCLG

<sup>30</sup> National Planning Policy Framework, paragraph 93 a), b), c) (2021) MHCLG

<sup>31</sup> <https://jsna.westsussex.gov.uk/updates/west-sussex-jsna-summary-2018/>

- 83.3% of the adult population are economically active (2017-2018) and the borough has a very high ratio of private sector jobs to public sector jobs;
  - Deaths (under 75 years) from cardiovascular disease have fallen over the last 10 years, although the rate of decline has slowed in recent years.
- 3.17 The West Sussex Joint Strategic Needs Assessment (JSNA) highlighted the following health challenges for Crawley:
- There are 14,900 people aged 65+, a number which is increasing more quickly;
  - The rate of violent crime in Crawley has increased in the last 5 years;
  - Life expectancy has increased but considerable inequalities persist, with a notable gap between the richest and poorest particularly in relation to men. Life expectancy is lower for people with mental health problems and for people with learning disabilities;
  - Approximately 18% of Year 6 pupils (10/11 year olds) are obese;
  - In 2016/17 62% of adults were estimated to be physically active (doing 150 minutes of moderate intensive exercise per week) and 24% physically inactive (<30 minutes of moderate intensive activity).
- 3.18 Proposals should consider the identified health needs of Crawley and reflect the expectations of the Sussex Health and Care Assembly and the Sussex Integrated Care Board which set out their priorities in the “Improving Lives Together” strategy document, Dec 2022<sup>32</sup>. The priorities are:
- A new joined-up community approach to health and care;
  - Growing and developing our workforce;
  - Improving the use of digital technology and information;
  - Maximising the power of partnership working.
- This work builds in part upon the priorities set out in the West Sussex Joint Health and Wellbeing Strategy (2019 – 2024)<sup>33</sup>. The West Sussex Health and Care Partnership, formed in 2020, has also developed a Place-based Plan with specific priority areas. These are: tackling the wider determinants of health, including delivering the Crawley transformation programme with new models for accessing health and care; addressing health inequalities; expanding Adult Services care in the community, including helping people remain independent as long as possible; and expanding support for children and young people, Mental Health, and Learning Disabilities and Neurodevelopmental Needs.
- 3.19 Reference should also be made to the Sport England and Public Health England’s Active Design guidance<sup>34</sup>, which sets out established guidance on how the design and layout of new developments can be planned to make communities more active and healthier. This includes “Ten Principles of Active Design”:
- |   |  |
|---|--|
| 1. Activity for all;                      | 6. High quality streets and spaces;                    |
| 2. Walkable communities;                  | 7. Appropriate infrastructure;                         |
| 3. Connected walking and cycling routes;  | 8. Active buildings;                                   |
| 4. Co-location of community facilities;   | 9. Management, maintenance, monitoring and evaluation; |
| 5. Network of multifunctional open space; | 10. Activity promotion and local champions.            |

<sup>32</sup> Improving Lives Together Our ambition for a healthier future in Sussex: Sussex Health and Care [0438-NHS-Sussex-VF4-4.pdf \(ics.nhs.uk\)](https://www.nhs.uk/0438-NHS-Sussex-VF4-4.pdf)

<sup>33</sup> West Sussex Joint Health and Wellbeing Strategy 2019 - 2024 - West Sussex JSNA Website

<sup>34</sup> <http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>

*The Essex Design Guide<sup>35</sup> should be considered against Crawley-specific circumstances and taken as a baseline for implementing the Ten Principles of Active Design into specific design guidance to help to activate spaces, including in relation to the specific advice in relation to planning and designing new developments with regards to the needs of the aging population and establishing health and wellbeing in order to help people achieve and experience better quality lifestyles.*

- 3.20 *Health Impact Assessments (HIA) and screening should be undertaken for all major applications and developments likely to give rise to significant health impacts. This should draw together the health benefits of the other application submission documents, including the design and access statement, design code, transport assessment and travel plan. This will allow schemes to be refined to maximise positive effects on health and wellbeing. Proposals should draw on good examples of best practice elsewhere, including, for example, healthy new towns, garden villages and communities, obesity trailblazers, London superzones, local delivery pilots, in order to design schemes within Crawley to meet the identified needs of the borough. When considering the health impact of individual developments, it is important that its surroundings are taken into account as well as its intended purpose. This includes uses involving vulnerable communities and sensitive uses, such as residential care homes, supported housing, schools, hospitals and health centres.*

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<sup>35</sup> <https://www.essexdesignguide.co.uk>



# Wellbeing & Communities

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

*By 2040, Crawley will be a place that people want to visit, to have fun and spend their leisure time. As a town within a countryside setting that is very much valued by local people, it will be safe and well cared for. The rich heritage which has shaped what the town is today will be respected, protected and enhanced.*

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

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

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



## Character, Landscape & Development Form

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

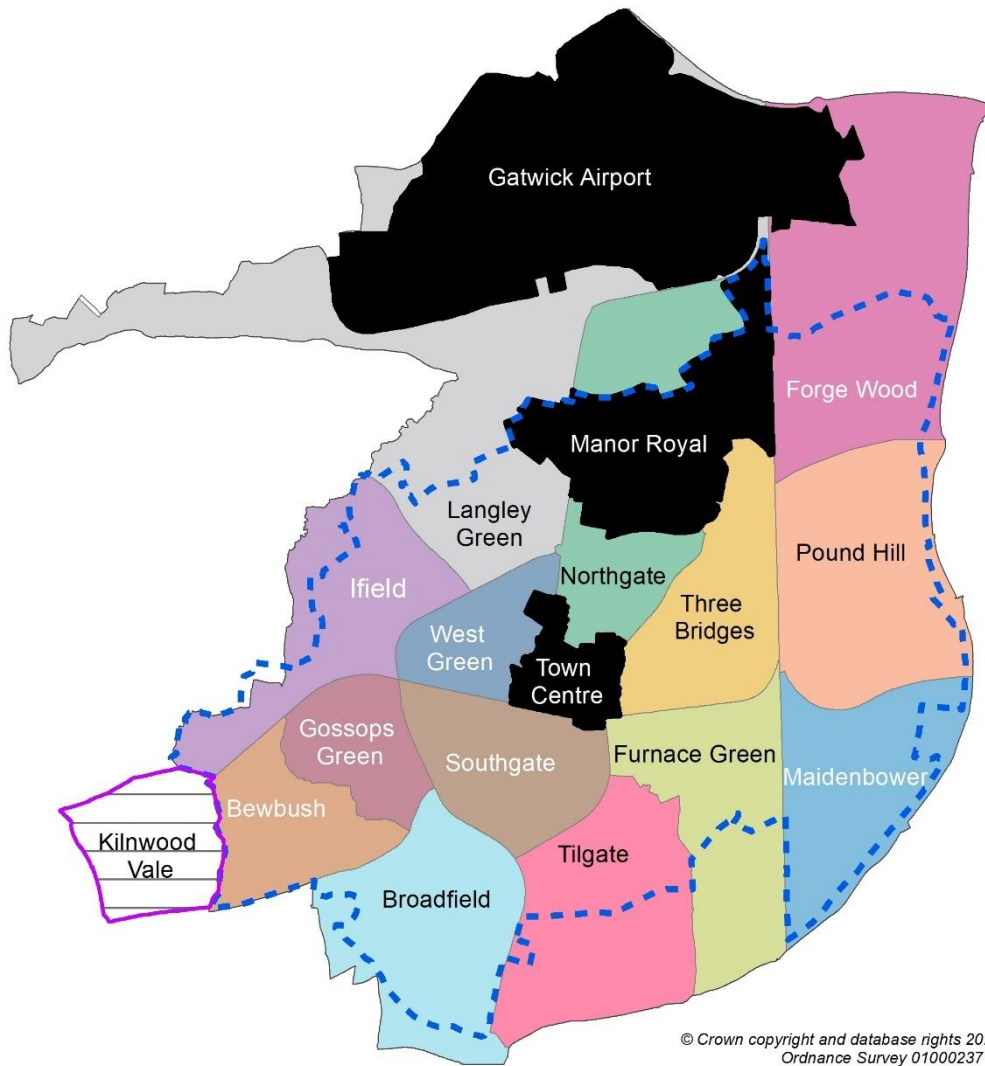
### Chapter Content

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

### The Key Issues

#### Neighbourhoods

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



**Figure 7: Crawley Neighbourhoods**

### Existing Area Character and Well Designed Places

- 4.8 In January 2020, the Ministry of Housing, Communities & Local Government (MHCLG) published “Living with Beauty”, the final report of the Building Better, Building Beautiful Commission (BBBCC), setting out its recommendations to the government and raising concerns about the quality of post-war development.
- 4.9 This concern is particularly relevant and timely when considering the NPPF’s requirements and emphasis in regard to the efficient use of land and increasing densities, and the importance of how new development should maintain and be grounded in an understanding and evaluation of each area’s defining local character and history. The NPPF<sup>36</sup> states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. It confirms that permission should be refused for development of poor design that fails to reflect local design policies and government guidance on design (contained in the National Design Guide and National Model Design Code), taking into account any local design guidance and design guides and codes and the opportunities available for improving the character and quality of an area and the way it

<sup>36</sup> National Planning Policy Framework, paragraphs 126 and 134 (2021) MHCLG

functions. The identification and understanding of local character is the essential first design and planning step to altering and reversing these disillusioning development outcomes.

- 4.10 In October 2019, the government published a new National Design Guide (NDG) entitled “Planning practice guidance for beautiful, enduring and successful places”. This states: “A place is more complex and multi-faceted than a building:
- *it is a setting for a diverse range of uses and activities, and is experienced by many people in many different ways;*
  - *it is made up of buildings, and also landscape and infrastructure, which are likely to endure longer than the buildings themselves;*
  - *most places evolve over a long period of time once they have been established, with many incremental changes that can affect their quality;*
  - *the quality of ‘delight’ includes a richness of experience gained from all of our senses, not only the visual; and*
  - *beauty in a place may range from a long view down to the detail of a building or landscape*<sup>37</sup>.
- 4.11 The NDG addresses the question of how we recognise well-designed places in the form of ten characteristics<sup>38</sup>, covering themes of character, community and climate. These ten characteristics work together to create the physical character of a place and are addressed in this Local Plan. This Chapter introduces a number of key policies, which address the NDG’s characteristics and the concerns raised by the BBBBC including key foundational steps to guide and direct the form of new development from the outset. This is particularly important as Crawley is a growing town with constraints on development set within a tight administrative boundary. This presents challenges, not least in terms of finding appropriate sites for the new development and infrastructure that is needed to support the town in the future. With significant development needed over the next 15 years, it is essential that the locally distinctive features that contribute positively to the town’s sense of place are recognised, protected and, where possible, enhanced.

### Effective Use of Land

- 4.12 The effective use of land is an important objective in making development more sustainable. As such, it is embedded in government policy. Compact development not only uses less land, but it also has the potential to create efficiencies in the use of other resources, including energy supply, services and transportation and to allow better provision of open space. It is important that land is used effectively, particularly given the limited land supply in the borough.
- 4.13 The NPPF is clear that in setting new policies, plans must contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This should include the use of minimum density ranges with higher densities expected particularly in Crawley Town Centre and other locations which are well served by high frequency, reliable public transport (see Policy CL3). In such locations, major new development should seek a significant uplift in the average residential densities (as outlined in Policy CL4), unless it can be shown that there are strong reasons why this would be inappropriate.
- 4.14 Today Crawley’s residential neighbourhoods are characterised predominately by two-storey, family-sized homes; all built meeting established internal and external space

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<sup>37</sup> National Design Guide, Chapter 5, page 3 (2019) MHCLG

<sup>38</sup> National Design Guide, Part 2 (2019) MHCLG

standards. In seeking higher densities for the borough, compromising the town's character, reducing quality of life for residents and creating town cramming, will still not be accepted.

- 4.15 Building at higher densities can make more efficient use of land and also deliver high quality development. However, higher densities can produce a poor quality environment and generate negative public perceptions. Higher residential densities can be successfully achieved in lower rise developments which use innovative ways of providing outdoor amenity space. Many of England's best urban areas are widely seen as attractive places in which to live, yet have a compact form and relatively high density.
- 4.16 Good examples of compact forms of development within Crawley include its Conservation Areas, such as St Peter's, Brighton Road and Ifield Village, as well as more recent developments, such as the Commonwealth Drive scheme at Three Bridges. In terms of layout, design and residential amenity, compact development requires more thought, expertise and craft than is usually applied to low density development. A far greater quality of architectural design, attention to detailing, materials and consideration of the needs of future occupants is needed. Crucially, compact development form needs to be carefully stitched and moulded into its surroundings, guided by the existing character of an area. The NPPF states that: *"In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings"*<sup>39</sup>.

### Landscape Character

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

## Local Plan Policies

### Neighbourhood Principle

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

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<sup>39</sup> National Planning Policy Framework, paragraph 134 (2021) MHCLG

## Strategic Policy CL1: Neighbourhood Principle

The neighbourhood principle will be protected and enhanced by:

- a) maintaining the neighbourhood structure of the town with a clear pattern of land uses and arrangement of open spaces and landscape features. Development within the neighbourhoods should mainly be residential, in-keeping with the existing neighbourhood. Where new compact development is appropriate and meets the required safeguards set out in Policies CL2, CL3 and CL4, mixed use and higher density development may be compatible with the existing structure of the neighbourhood, particularly if it is situated in sustainable locations such as their neighbourhood centres;
- b) ensuring the neighbourhood centres remain the focal point for the local community, providing facilities that meet their day-to-day needs within walking distance; and
- c) encouraging development unless it would result in local facilities and services which help meet the day-to-day needs of residents being lost or conflicts with other policies within the Plan.

### Reasoned Justification

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

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

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

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

### Existing Local Character

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

### The Form of New Development

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

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

To assist in the creation, retention and/or enhancement of successful places, all new development must:

- i. Meet the design parameters and principles as set out in the National Design Guide (NDG) and National Model Design Code (NMDC), in the absence of locally produced masterplans, design codes or guides.
- ii. Demonstrate that new proposals have addressed the following in particular:

##### 1. Existing Character, Design Vision and Opportunities

All new development must identify, define and be designed so that proposals respect, protect, build upon and enhance the positive aspects of existing character, significance and distinctiveness of both the site and wider area.

For major applications, proposals must demonstrate and document how the positive and valued components of existing, wider area rural/urban structure have guided and directed the form of new development. Area-based character assessment should, **and for schemes of moderate density and above must**, be used to identify a clear design vision and opportunities available and in turn use these opportunities to define the types of place(s) the proposal aims to achieve; **The Assessment, vision and opportunities should demonstrate** how **the proposal** it will contribute to the sustainable development of the area, and how the existing special qualities of an area will be reflected in new proposals, while not preventing or discouraging appropriate innovation or change (such as increased densities).

~~For schemes of moderate density and above, Area Based Character Assessments must be used and the identification of opportunities and the design vision must be developed with local communities.~~ Design principles and parameters reflecting these must be set out at a broad level for the surrounding area and as detailed design requirements for the site. This can be in the form of masterplans, design guides and/or codes.

##### 2. Effective Use of Land

All new development must identify, test, determine and (where appropriate) embrace opportunities for increased density, **and major applications must** meeting the requirements of Policy CL3 criteria **i and ii a) to e)** and Policy CL4.

##### 3. Built Form, Layout and Movement

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

- i. demonstrate how **all** the components and characteristics of **a well-designed** place **as set out in the National Model Design Code**, ~~both existing and proposed~~, have been considered to create a well-designed proposal;
- ii. demonstrate how places are experienced (both currently and proposed) including valuable visual connections into, out, through and beyond the site;
- iii. make connected places that are permeable for people and wildlife;
- iv. provide recognisable spaces and routes that are attractive, safe, uncluttered and which work effectively for all in society, including disabled and elderly people. Intersections and landmarks should be used and designed to help people find their way around and create places that are legible and easy to read; and
- v. optimise orientation, solar gain and aspect, for both outdoor space and buildings.

Major applications must:

- a) ensure the proposed urban structure results in **active travel** movement paths and corridors which are determined by where people want to go within and beyond the development, taking advantage of direct desire lines as much as possible;
- b) create continuous frontages onto streets and spaces enclosed by development which clearly define private and public areas and ensure streets, footpaths and open spaces are overlooked by buildings; and
- c) ensure movement corridors and the placing of new development take account of long distant vistas, landmarks, views into and out of adjoining areas, gateways to and between particular areas, and focal points.

Major, **moderate and high-density range** applications should use illustrative tools, such as accurate 3D massing models, to show the basic form of new proposals in relation to their existing setting/surrounding context, particularly from a street level perspective.

### **Reasoned Justification**

- 4.26 *An unprecedented number of densification, intensification and infill development projects as well as new planned urban extensions are occurring across big cities and towns throughout the UK, and Crawley is no exception. New urban characters are being introduced near, alongside and within established neighbourhoods, at a fast pace. Policy CL2 aims to ensure the positive characteristics and qualities of a place are articulated, defined and understood.*
- 4.27 *The impact of development on the existing character of an area is complex and it needs to be considered through varied lenses. Existing character assessment is required in order to produce a vital evidence base. Character Assessments should bring together as many aspects of a place as possible in order to appreciate and understand it better. They will provide an understanding of the local context and an analysis of local character and identity to guide and dictate the form of new development. The extent, content, analysis and conclusions reached will vary and overlap across differing areas.*
- 4.28 *In 2009, the council completed a baseline character assessment of the town to help define its sense of place and this should be considered to inform the design of development proposals<sup>40</sup>. While the council is bringing forward full area wide character assessments, this existing evidence will help provide an initial understanding of local context and identity. However, should the relevant full, detailed assessment not be completed where a development is proposed, developers will be expected to support us in their delivery. The 2009 assessment identified broad character areas and positive features that should be protected and enhanced, including the green setting of the town*

<sup>40</sup> Crawley Baseline Character Assessment (2009) EDAW/AECOM



and the quality of particular buildings and views. The assessment used key urban design principles to assess the quality of areas drawn from the DETR publication “By Design – Urban Design and the Planning System”. This was supported by a Heritage Assessment of some of the key heritage and character areas within the borough, carried out in 2010<sup>41</sup> (reviewed in 2020). Some of the places identified are now designated as Conservation Areas and Areas of Special Local Character (ASLC’s). These areas are identified in this Local Plan, Chapter 6: Heritage.

- 4.29 To provide maximum clarity about design expectations at an early stage, the council will continue to develop overarching design vision and expectations that can inform masterplans, design codes, guides and other tools that inform the design of the built and natural environment in Crawley. These will be consistent with the principles set out in the National Design Guide and National Model Design Code, and will reflect local character, local aspirations and design preferences. The level of detail and degree of prescription for these will vary according to the circumstances and scale of change anticipated in different areas. Landowners and developers may contribute to these exercises.

#### Well-Designed Places:

- 4.30 “Well-designed places and buildings come about when there is a clearly expressed ‘story’ for the design concept and how it has evolved into a design proposal. This explains how the concept influences the layout, form, appearance and details of the proposed development. It may draw its inspiration from the site, its surroundings or a wider context. It may also introduce new approaches to contrast with, or complement, its context. This ‘story’ will inform and address all ten characteristics. It is set out in a Design and Access Statement that accompanies a planning application”<sup>42</sup>. Taking account of Government guidance<sup>43</sup>, the council considers good urban design is defined by the following key NDG characteristics:

#### 1. Context

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

The identification of individual components that contribute positively to existing character is dependent on an accurate evidence base, including heritage assessments, landscape and visual constraint analysis, identification of the existing rural and urban structure, areas of special environmental quality, key views, and pedestrian rights of ways and desire lines.

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

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<sup>41</sup> Crawley ASEQs and Locally Listed Buildings Heritage Assessment (2010) Alan Baxter

<sup>42</sup> National Design Guide, page 16 (2019) MHCLG

<sup>43</sup> National Design Guide (2019) MHCLG

proposals are most effective when based on appropriate evidence of the defining characteristics of the area, such as its historic, landscape and townscape character, especially the following structural components: movement routes (paths); linear boundaries (edges); character areas; strategic points (inc. movement nodes); landmarks; and topography.

## 2. Identity

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

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

## 3. New Built Form

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

## 4. Movement

New development should be accessible, clear and easy to move around within as well as to and from. In particular, attention should be provided to movement patterns including streetscape and landscape; and separation aspects, such as connectivity, permeability and legibility.

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

## 5. Nature

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

## 6. Public Spaces

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

The quality of the spaces between buildings is as important as the buildings themselves. Public spaces are streets, squares and other spaces that are open to all and they are the setting for most movement. The design of a public space encompasses its siting and integration into the wider network of routes as well as its various elements.

*These include areas allocated to different users – cars, cyclists and pedestrians<sup>44</sup>. Successful spaces and streets contribute to the quality and character of a place, not just how it functions.*

## 7. Uses

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

### Illustrative Tools:

- 4.31 *In order to assess and communicate the quality and impact of large new development form, accurate views from key points are essential. Chosen views must be from a realistic street level position (i.e. average adult eye height). Basic, accurate massing modelling using software such as sketchup is sufficient and should be submitted to the council for review. Accurate photo-montaged images (showing adjoining/retained context) are also particularly beneficial in aiding visual communication and confirming the suitability of higher density ranges and building height.*

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

- 4.32 Good urban design is sustainable design. Urban form and structure have a major influence on climate change. There is a crucial relationship between form and space, buildings, energy, movement patterns, land take and location. As the National Design Guide states:  
*“Compact forms of development bring people together to support local public transport, facilities and local services. They make destinations easily accessible by walking or cycling wherever this is practical. This helps to reduce dependency upon the private car”<sup>45</sup>.*  
*“Patterns of movement for people are integral to well-designed places. They include walking and cycling, access to facilities, employment and servicing, parking and the convenience of public transport”.*
- 4.33 Sustainable urban design is not just about changing the way places look but about making places work better. Good design should be based on an understanding of movement patterns around which appropriate uses can be located and then suitable densities determined (see Policy CL4). Choices made in relation to the layout and scale of new development strongly influence everyday human activity, particularly in relation to movement which dictates how people move within, through and around a place. As a result, it has a major influence on climate change. Government policy makes it clear that higher residential densities, public transport and sustainability are all interconnected and that they rely upon one another in order to achieve an increase in the supply of residential units.
- 4.34 Fast, reliable, frequent and high capacity public transport is one of the key infrastructure foundations required to enable higher levels of compact, sustainable residential density. Crawley already has some of this transport infrastructure in place with key bus and rail routes and interchanges.

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<sup>44</sup> National Design Guide, page 30 ‘Public Spaces’ (2019) MHCLG

<sup>45</sup> National Design Guide, page 19, 63, ‘Compact form of development’ (2019) MHCLG

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

All development should seek to:

1. Use land more efficiently and sustainably, integrating land uses and movement networks. It should build upon, connect to, enhance and extend sustainable movement, in turn maximising opportunities for compact development and sustainable travel and increased levels of sustainable transport modal share.
2. **Ensure that buildings are orientated to overlook movement corridors in order to provide passive supervision and safety.**

~~2.~~ **Major development should** Put people before traffic and encourage walking and cycling through establishing a layout of **pathways routes, within the proposed site** which:

- i. Understand and respond to the wider borough pattern of movement, demonstrating how walking and cycling connections will enhance and integrate schemes with Crawley town centre, local centres, transportation hubs, schools and employment areas.
- ii. Connect, **or provide scope for future connection, from** new development to areas of rural open space and/or large urban areas of green open space. **and ensure n** New route alignments **should** follow **direct** desire lines as much as possible allowing for **sustainable travel** through routes to be straight and direct, providing clear, legible and obvious linkages to adjoining areas. This should draw **active travel routes points of connection** into and through new sites to create a strong and direct street, path and open space network.
- iii. ~~Ensure that buildings are orientated to overlook movement corridors in order to provide passive supervision and safety.~~

A contribution may be required to fund or part-fund the delivery/improvement or expansion of sustainable transport infrastructure (see Policy ST1 and the Planning Obligations Annex).

#### **Reasoned Justification:**

- 4.35 *Too often permeability and connectivity is treated as an afterthought leaving new development isolated with minimal or disjointed linkages to the wider sustainable transport network and reliant only on the car. New development should be seen as an opportunity to integrate improvements to active travel and public transport corridors. Whether strategic or small in size, all new development needs to consider its place and impact within the wider context and consideration should be given beyond the site's red lines. The established evidence base of the Crawley Local Cycling and Walking Infrastructure Plan (LCWIP) can be built upon, and the direct desire lines of wider routes can be reflected in detailed local scale layouts.*
- 4.36 *This is particularly important, with regard to movement patterns, in establishing walkable neighbourhoods and ensuring new development can optimise and promote modal shift to sustainable alternatives. The smallest development proposals can contribute to improvements, such as enhancing a short link to a footpath, or including a window for natural surveillance over a route.*
- 4.37 *Delivering relatively straight, through routes, particularly for pedestrians and cyclists, is very important. It requires looking both outward to the wider network as well as inward to the site being developed. When a district or movement corridor is well connected it will naturally encourage sustainable movement patterns and reduce the dependence and reliance on vehicular movement. It will also have high pedestrian footfall, which will*

*improve local centre viability and attract local shops and services, closer to where people live and work.*

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

- 4.38 The NPPF is clear that “*the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve*”<sup>46</sup>. Good design is key as it helps make development acceptable to communities. All areas have differing capacities for change and potential for intensification; there are, for example, limited opportunities for change in Conservation Areas and Areas of Special Local Character.
- 4.39 Density is just one aspect of built form. As referred to in paragraph 4.24, building height, block size and building typology all affect the character of an area and the perception of density. Density and mix is concerned with the amount of development, intensity of activity and the associated range of uses. Accessibility, street life, vitality and viability are all impacted differently depending on development scale or levels of density. Many schemes are perceived to be excessively dense, visually inappropriate and generally out of keeping with their adjoining context when they fail to take account of the need for density and form to be appropriate to its context. This does not mean that density, design or unit typology should be the same as the surrounding area, but new buildings need to respect their neighbours.
- 4.40 The creation of high quality buildings and places is fundamental in order to secure more sustainable, compact development across the borough. Compact development and the determination of density ranges must be directed first and foremost by the following two parameters:
1. The existing character of an area: Density and mix, height and massing and proposed urban structure must complement, build upon, retain and protect successful attributes of an area, as outlined in Strategic Policy CL2.
  2. Proximity to sustainable movement or the potential for achieving this (Policy CL3).

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

#### Appropriate Residential Density

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

In the following specific locations, unless the existing character justifies a lower figure, major proposals must achieve the following minimum densities in order to make the best use of land and encourage modal shift to sustainable transport options:

- i. **High density:** A minimum of 200 dwellings per hectare for development sites within 800m (a 10 minutes’ walk) of Crawley or Three Bridges train stations, Crawley bus station, and/or within 640m (8 minutes’ walk) of the ~~eight~~ Town Centre Fastway stops at the Broadway and Leisure Park.
- ii. **Moderate density:** Within a range of 60 - 200 dwellings per hectare for development within:
  - Neighbourhood Parades;

<sup>46</sup> National Planning Policy Framework, paragraph 126 (2021) MHCLG

- Areas within 8 minutes walking distance of stops along Fastway Route 10 (as listed in para 4.44(2), or where a similar or enhanced public transport service is provided in the future, which are within 5 minutes walking distance of a local foodstore and 10 minutes of a primary school or health centre.

Developments of significant scale outside these locations must be high or moderate density and will only be permitted where they can provide appropriate levels of accessibility to enhanced public transport services.

### **Reasoned Justification**

- 4.41 *National planning policy emphasises the need to plan for the effective use of land in order to deliver a sufficient supply of homes, and states that strategic policies should make “as much use as possible of previously-developed or ‘brownfield land’<sup>47</sup>... and “promote and support the development of under-utilised land and buildings”<sup>48</sup>. Furthermore, the NPPF identifies that “small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly”<sup>49</sup>.*
- 4.42 *The commercial viability of frequent and reliable public transport depends on compact development and minimum densities. Compact neighbourhoods provide a more substantial and reliable customer base for public transport services. In turn, frequent and reliable services encourage a shift away from private car use. Research<sup>50</sup> suggests net densities of 60 dwellings per hectare are necessary to sustain a dependable, frequent and high capacity public transport service, such as currently exists in Crawley along sections of the Fastway bus network. The borough’s existing key corridors, access points and interchanges include:*
1. *Crawley Town Centre rail and bus station hub.*
  2. *Two high frequency, quality bus corridors, running north/south along Fastway bus Route 10, including Routes 20 and 100, as follows:*
    - a. *Where Route 20 aligns with 10, all stops between Gatwick Airport and the Gatwick Road North stop; and all stops between the Southgate Avenue south of s Station w Way stop and to Broadfield Barton stop;*
    - b. *Where Fastway Routes 10 and 100 intersect; the Manor Royal Centre stop, and in the Town Centre, Crawley Bus Station and the Broadway.*
  3. *Gatwick Airport and Three Bridges rail stations.*
  4. *Gatwick Airport coach station.*
- If new routes or services are to be provided to support new significant development, appropriate walking distances should be as set out in Policy CL4i and ii.*
- 4.43 *Density, which will be measured as the net dwelling density in dwellings per hectare<sup>51</sup>, has to be appropriate to context in the first instance. Policy CL1(a) confirms that mixed use and higher density development may be compatible with the existing structure of the neighbourhood, particularly if it is situated in sustainable locations such as their*

<sup>47</sup> National Planning Policy Framework, paragraph 119 (2021) MHCLG

<sup>48</sup> National Planning Policy Framework, paragraph 120d (2021) MHCLG

<sup>49</sup> National Planning Policy Framework, paragraph 68 (2021) MHCLG

<sup>50</sup> Urban Design Compendium, page 47 (HCA 2013 and English Partnerships 2007)

<sup>51</sup> Net dwelling density is calculated by including only those site areas which will be developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children’s play areas, where these are provided.

neighbourhood centres. Local Design Standards and area-wide design assessment will inform which options are most appropriate in terms of character and context for different parts of Crawley. Successful extensions of the character of the surrounding area can help create great settings for new development. Policy CL4 establishes a minimum density expectation for the borough of at least 45 dwellings per hectare. This has been reached through an assessment of the town's existing density levels, considering good practice within the borough and through seeking to achieve a challenging but generally appropriate minimum level in order to maximise effective use of land without creating significant harm to amenity and character.

- 4.44 *In all areas (including within those locations specified in the policy to be appropriate for high and moderate density levels) the presence of sensitive heritage assets and existing character could mean much lower densities would be required. For example, these may be areas within or affecting the setting of Listed Buildings, Conservation Areas and Areas of Special Local Character or locally listed assets, pre-1947 areas of the borough including Victorian districts, and areas within or affecting the setting of the original New Town shopping precinct and its setting. In such locations, significant adverse impact on sensitive assets would justify not meeting the minimum density levels required by this Policy and development which could potentially cause significant adverse impact on such locations must be carefully designed (in accordance with the Policies set out in the 'Heritage' chapter of this Local Plan).*
- 4.45 *Density is usually expressed in units per hectare. However, whilst density is a mechanism to measure schemes against, no specific design qualities or characteristics are implied. In ensuring reaching higher density levels in Crawley does not result in poor decisions and/or town cramming, it is essential that density is seen as a product of design, not a determinant of it. The council's Compact Residential Development Study provides greater detail in relation to increasing densities in Crawley to support the implementation of this Policy.*
- 4.46 *The way in which a place is designed is more important to its desirability than the measurement of its density. Measured density and perceived density are not necessarily aligned. On the same sized plot, different approaches to urban form and height can achieve the same density. The following three approaches to form are a good example of this:*  
*(1) two and three storey terraced housing; urban form: high site coverage pattern;*  
*(2) three and four storey buildings with varying height, block size and building depth; urban form: medium site coverage;*  
*(3) a high rise tower block; urban form: low site coverage.*
- 4.47 *As is typical of new towns, Crawley was conceived as a lower-mid density town with average densities of 21/28 dwellings per hectare. Many of England's best urban areas and many of Crawley's historic Conservation Areas have a compact form and considerably higher densities.*
- 4.48 *In seeking to achieve higher densities, an over-provision of smaller studio and one bed units against the council's housing needs would not be considered acceptable. Policy H4 sets the expected housing mix for schemes within the borough and proposals will be measured against this starting point. Similarly, the council's policies relating to internal and external space standards and accessible and adaptable buildings (Policies DD2 and DD3) will also be required to be met in all new residential developments. The Housing Typology policies (Policies H3 and H3a-H3f) provide some further policy consideration for housing development on a range of sites across the borough.*

## Masterplanning, Design Codes and Design Review

- 4.49 A suite of government guidance supports the NPPF objectives outlining and illustrating the government's priorities for well-designed places. Specific, detailed and measurable criteria for the good design of larger applications are most appropriately set out at the local level, as clarified by Strategic Policy CL2. In areas where higher density ranges may be appropriate, masterplans and bespoke design codes will be prioritised by Crawley Borough Council.
- 4.50 The NPPF highlights the valuable role of Design Review in ensuring high standards of design. Crawley Borough Council recognises how an independent design review of proposals could be advantageous for large or significant applications and this will be discussed with developers should demand arise. Applicants will be required to resource any design review agreed. As is the case with pre-application consultation, early constructive discussions with a peer review process will help the design development process. A panel would be an advisory body with no formal decision-making powers.

### Policy CL5: Significant Development, Masterplanning and Design Success

To support applications for significant developments or for a group of smaller sites which, on aggregate, form substantial wider area development, Masterplans will usually be required. In addition to the requirements of Policy CL2, they will need to illustrate and describe how planning and design policies and guidance have been taken into account and how these will be implemented, both within the applicant site and its wider context.

#### Masterplanning and Design Codes

**Proportionate Masterplans and codes, the identification of opportunities and the design vision based on Area Based Character Assessments must be developed with local communities. Proposals will need to set out an overall vision for the site and its context. These should be prepared as part of area-wide and site-specific design codes, should providing indicative and flexible vision for future development form, urban design concepts and design codes informed by preliminary technical appraisals and viability testing.**

Masterplans must chart overall urban design guidance and intent. They should demonstrate:

- i. how a site or series of sites will be developed, implemented and phased;
- ii. key elements such as the landscape and movement strategy, including connections to the wider street network, the position of different area types, key areas of active frontage and public realm;
- iii. principles on matters of importance rather than prescribing design in detail.

Applications for particularly significant schemes may be asked to present to a design review panel.

#### **Reasoned Justification**

- 4.51 *The National Design Guide (NDG) and National Model Design Code (NMDC) provide guidance on what constitutes well-designed and beautiful places as well as providing a default checklist of issues that schemes will be expected to address.*
- 4.52 *Masterplans and Design codes must be based on an extensive baseline analysis in order to understand an area (such as existing Character Assessment, flood risk, movement routes and public transport accessibility). This assessment must always look beyond the red line that marks the extent of an applicant's site. This will in turn inform a vision which will direct and form the basis for the development of masterplans, which*



set the framework for more detailed design codes, Parameter plans can provide key structuring and placemaking components, elements of the framework within which more detailed design proposals are generated, but they are not a substitute for a clear design vision and masterplan and will not be acceptable for significant development.

- 4.53 *Masterplans and design codes should “provide greater certainty for communities about the design of development and bring conversations about design to the start of the planning process rather than the end”<sup>52</sup>. Early pre-application discussion between applicants, the local planning authority and local community is important, especially where wider contextual understanding and consideration is required. This is particularly the case for schemes of moderate or high density, and where opportunities for improved movement (especially active travel and access to public transport) are available. Early discussion can help clarify expectations and reconcile local and commercial interests. Conceptual ideas should be explored before settling on an agreed way forward and producing a site layout. Design development is an iterative process and for significant development in particular, will usually involve constant and frequent reviews of all the issues as more information is obtained.*
- 4.54 *The agreed design parameters and frameworks will identify and embrace key components of the context and character of an area or site. Used effectively, this output can in turn help identify and deliver an appropriate new high quality form, both of landscape and structures, private space and public realm. Design codes may also provide new development with a template within which to design individual buildings. “As with any project, you cannot hope to get what you want at the end of the process if you have not defined what you wanted at the outset and prepared a good brief. The implementation plan should be integral to the preparation of the spatial masterplan; one must inform the other”<sup>53</sup>.*
- 4.55 *Design codes and Masterplans should be used to set out how to create and sustain excellent places for living, work and place. They should ensure design quality and adherence to a vision on a specific site, reflecting site constraints, opportunities and an agreed vision. Assessment frameworks such as Building for a Healthy Life (Design for Homes, 2020) offer helpful non site or area specific design codes which focus on a number of key NDG /NMDC areas and 12 qualities of successful places in relation to these. Guidance is also set out in Planning Practice Guidance, Design: Process and Tools, MHCLG, 2019, CABE’s publication ‘Creating successful masterplans, a guide for clients’ 2008/09, The Urban Design Compendium<sup>11</sup> and the National Model Design Code (MHCLG 2021).*
- 4.56 *If consistent with the Local Plan, and if Masterplanning work has been prepared in collaboration with the local planning authority in accordance with the Planning Regulations, including undertaking a period of appropriate public consultation and sustainability appraisal screening, this work may be adopted formally as a Supplementary Planning Document.*
- 4.57 *This Policy applies to significant developments. Significant development will generally refer to all proposals of significant scale in excess of 150 dwellings or 6,000sqm of commercial floorspace. Masterplans may also be required for smaller developments in highly sensitive locations and may be necessary where cumulative development is significant within a 670 metre radius and/or where comprehensive development is considered particularly critical.*

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<sup>52</sup> National Model Design Code, part 1, p2 (2021) MHCLG

<sup>53</sup> ‘Creating successful masterplans, a guide for clients’ Chapter 32, 2.2 (2008/09) CABE

## Structural Landscaping

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

### Policy CL6: Structural Landscaping

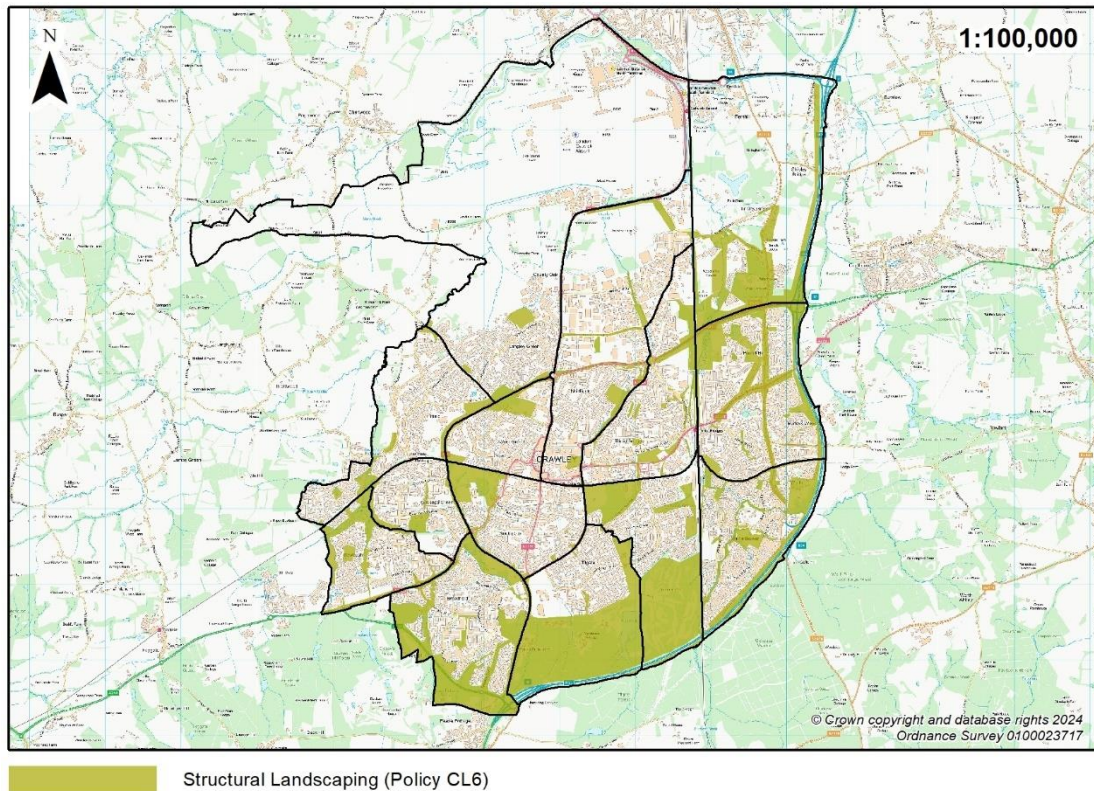
Areas of trees and soft landscape that make an important contribution to the development of the town and its distinct neighbourhoods, in terms of character and appearance, structure, screening or softening, have been identified on the Local Plan Map as Structural Landscaping. Developments are required to respect and plan for the conservation of the landscape character of the town 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.

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

### Reasoned Justification

4.59 *This Policy seeks to ensure that development schemes identify and take account of existing structural landscape assets which are a positive element of the character of the town. The Policy also seeks to ensure that impacts on structural landscaping assets are not dealt with as an afterthought, but progressed as an integral part of the design of the scheme, including opportunities for improvements. Consideration should also be given to the key role of structural landscaping and strategic views in order to maintain or improve the character of Crawley. Crawley benefits from significant tree cover contributing to the quality of its environment and helping mitigate climate change. However, as an urban area, new tree planting may not always be the best use of land, and other forms of soft landscaping and habitats could be a beneficial alternative in some cases.*

4.60 *To maximise multiple benefits of Structural Landscaping, in line with and complementary to the character of the area, these can also be designed and managed as species-rich habitats. Wildflower meadows and flower-rich habitats, in particular, are crucial to supporting pollinators by providing good sources of nectar and pollen throughout the summer and also shelter and nest sites. The council is committed to securing such enhancements wherever possible.*



**Figure 8: Structural Landscaping**

### Important Views and Valued Landscape

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

#### **Policy CL7: Important and Valued Landscape and Views**

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

- **Linear Contained Views**

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

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

- **Long Distance Views**

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

### Valued Landscape and Views

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

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

Area Based Character Assessments, when prepared, will further identify valued localised views and valued landscape. Where such work defines urban and landscape structure, the relationship between landscape, settlement and movement patterns, will be framed and founded upon both long distance and linear views and spatial distinctiveness relative to the surrounding setting.

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

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

### **Reasoned Justification**

- 4.62 *The council has identified a number of important views which can be enjoyed from a publicly accessible viewpoint. These enable the viewer to appreciate an attractive or interesting view of areas of the borough that may include landscape features or built landmarks. The location of viewpoints and the general direction of the view are identified on the Local Plan Map.*
- 4.63 *Area Based Character Assessments, prepared by the council or developers (see paragraph 4.29), will identify demonstrable physical attributes which take a particular 'valued landscape' beyond mere countryside. The same is true for landscape within the built-up area boundary. Identifying the quality and geographical extent and setting of valued landscape is not about the red line of a particular development site, a first consideration has to be the extent of the land which makes up the wider landscape under consideration before examining whether or not there are features which make it valued.*
- 4.64 *A small section of landscape or site itself may not exhibit any of the demonstrable physical features of value but as long as it forms an integral part of a wider 'valued landscape' it should be considered to deserve protection.*

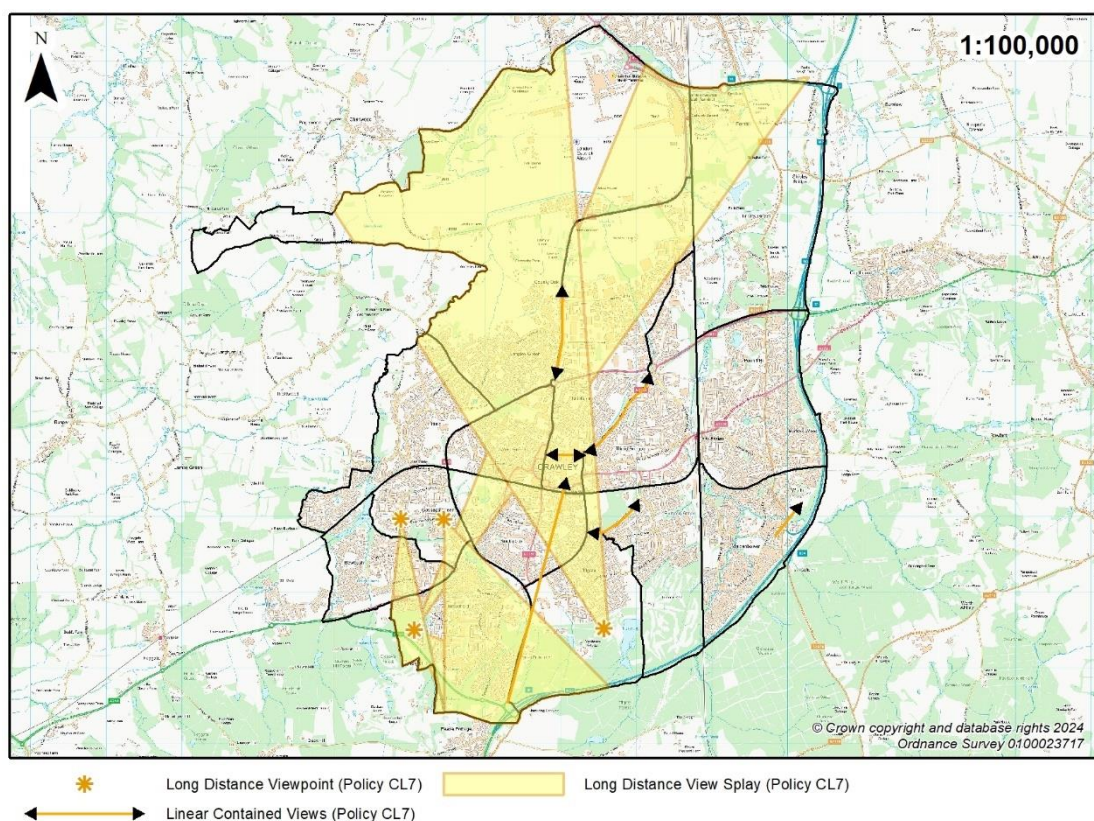
### Linear Contained Views

- **Balcombe Road:** View from Grayrigg Road and Balcombe Road towards the Grade I Listed Building, St. Nicholas' Church.
- **The Boulevard:** View between the western side of High Street at its junction with The Boulevard to the Crawley College tower on the eastern side of College Road, enclosed by trees and buildings.
- **Brighton Road:** View from A23/A264 junction, northwards along Brighton Road, to the town centre. The view is contained by trees between the A23/A264 junction and the football stadium/K2 Crawley leisure centre.

- **Hawth Avenue:** View in two directions, enclosed by trees. Any redevelopment proposals on Russell Way have the potential to terminate the view from the north eastern end of Hawth Avenue, at the junction with Weald Drive.
- **London Road:** View between Tushmore Roundabout and Martyrs Avenue enclosed by trees and then up to County Oak Roundabout.
- **Northgate Avenue:** View in both directions between Northgate Roundabout and Central Sussex College, enclosed by trees.

#### Long Distance Views

- **Buckwood Drive:** Panoramic views, from vicinity of the northern junction with Kingscote Hill, to the south-east across trees associated with Broadfield Brook and adjacent open space to wooded areas east of Brighton Road and within Tilgate Park.
- **Gossops Drive:** Long distance view southwards from Gossops Drive, between Cobnor Close and Eden Road, to the part of Target Hill that lies within the borough boundary.
- **Target Hill:** Views from south-eastern side of the hill, from the vicinity of the junction of Hobbs Road and Edrich Road, to the north-east over the Broadfield Mosque, across the borough to distant hills, and to the south east over the wooded areas associated with Creasy's Brook, the Eddington Hill area and the portion of Pease Pottage Forest and the AONB that lie within the district.
- **Tilgate Park:** Long distance views, northwards from the country park car park and the adjacent area of open space to the north, across Tilgate, Southgate and the town centre and beyond to Leith Hill, Box Hill and Colley Hill.



**Figure 9: Important and Valued Views**

4.65 The designation would not duplicate protection afforded to Listed Buildings or Conservation Areas. Important but more localised valued views and landmarks, i.e. less than approximately 200m, will be identified, protected and enhanced through Conservation Area, Area of Special Local Character or Locally Listed Building assessments. A number of the important landmarks in the borough are Listed Buildings and some are located within Conservation Areas, including St. Margaret's Church, Ifield;

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

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

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

- 4.67 It is important that a vibrant multifunctional landscape around Crawley is encouraged, maximising its contribution to people's quality of life, wellbeing, the natural environment and the economy. The Crawley Borough Council Landscape Character Assessment has been used to set the criteria based policies which encourage proposals that respect the character and role of different areas. Policy EC13 of the Local Plan supports appropriate small-scale economic development beyond the Built-Up Area Boundary, where this would not undermine the intrinsic character and beauty of the countryside. There may also be limited opportunities for appropriate new residential development.

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

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

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

- xi. Ensure access to the countryside is maintained and enhanced from Crawley's neighbourhoods, in accordance with Policy OS3 and demonstrate how such areas can be better experienced; and
- xii. Avoid introducing a use which by virtue of its operation is not compatible with the countryside.

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

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

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

#### North East Crawley High Woodland Fringes

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

#### Upper Mole Farmlands Rural Fringe

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

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.

#### West of Ifield Rural Fringe

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

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

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

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

The green fingers and local nature reserve will be conserved as they provide existing green infrastructure links with potential for improvement to accessing the countryside and wildlife corridors. The area is valued for its quiet recreational opportunities which should be

maintained. Proposals should not conflict with the High Weald Area of Outstanding Natural Beauty (AONB) Management Plan objectives.

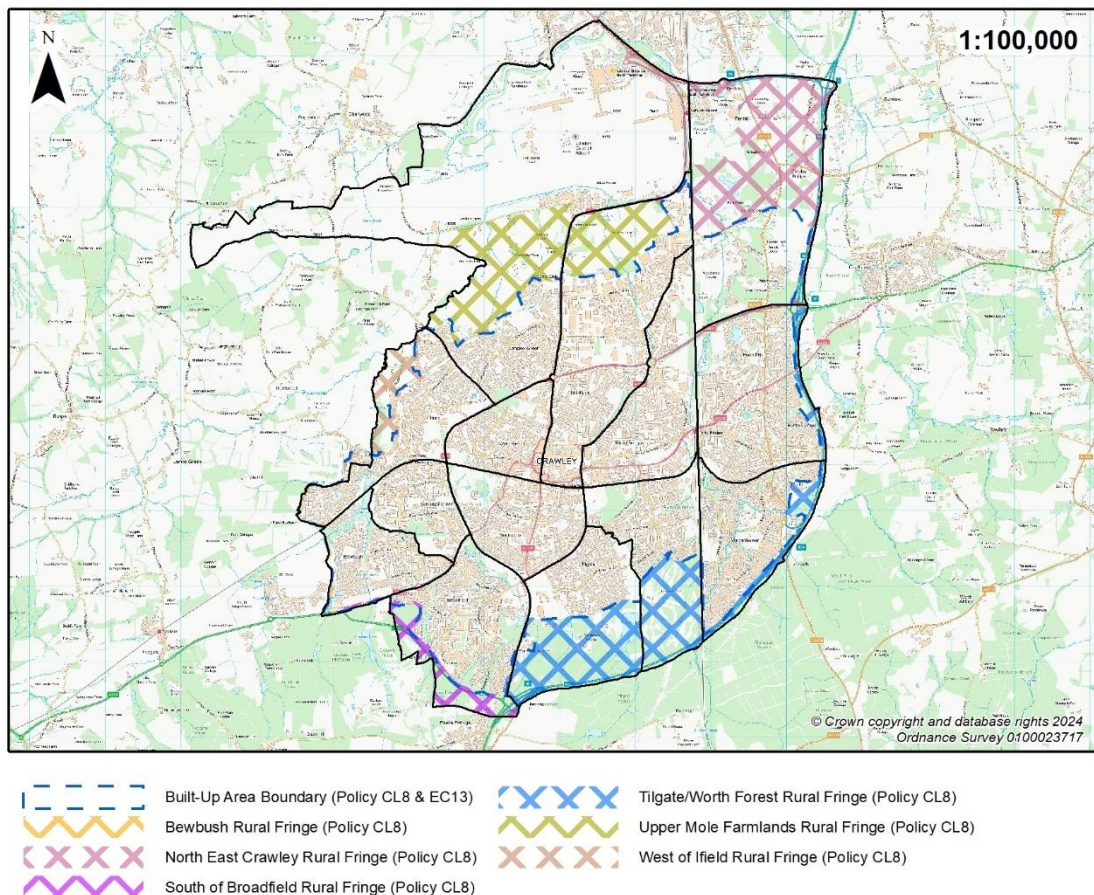
**Tilgate/Worth Forest and Fringes**

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

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

**Reasoned Justification**

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



**Figure 10: Crawley's Countryside Character Areas**



- 4.69 *It is important to ensure the rural fringe does not become incrementally more suburban in nature which would conflict with the overarching principles on meeting the presumption in favour of sustainable development (Policy SD1: Presumption in Favour of Sustainable Development) and will be resisted. Urban extensions will be in the countryside outside Crawley’s boundary and need to be properly planned to ensure the important contribution of the rural landscape setting for Crawley’s neighbourhoods is not lost. The visual, spatial and environmental aspects of their landscape setting must be fully assessed and any development planned to protect and enhance important aspects.*
- 4.70 *To respond to demand for business<sup>54</sup> land, carefully planned extensions to Manor Royal, abutting its boundary, may be appropriate. 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. Appropriate development in this location must be of a scale that is appropriate to and respectful of the adjoining countryside setting and ensure adequate landscaping, screening and design of buildings to minimise intrusion of the urbanised area on the rural fringe boundary. Where planning permission is implemented, the Built-Up Area Boundary will be reviewed.*

### **High Weald [National Landscape](#) Area of Outstanding Natural Beauty**

- 4.71 The High Weald [National Landscape](#) Area of Outstanding Natural Beauty (AONB) is a nationally important landscape where great weight should be given to conserving the landscape and scenic beauty of the designation. A small area of the [National Landscape](#) AONB lies within the southern boundary of the borough.

#### **Policy CL9: High Weald [National Landscape](#) Area of Outstanding Natural Beauty**

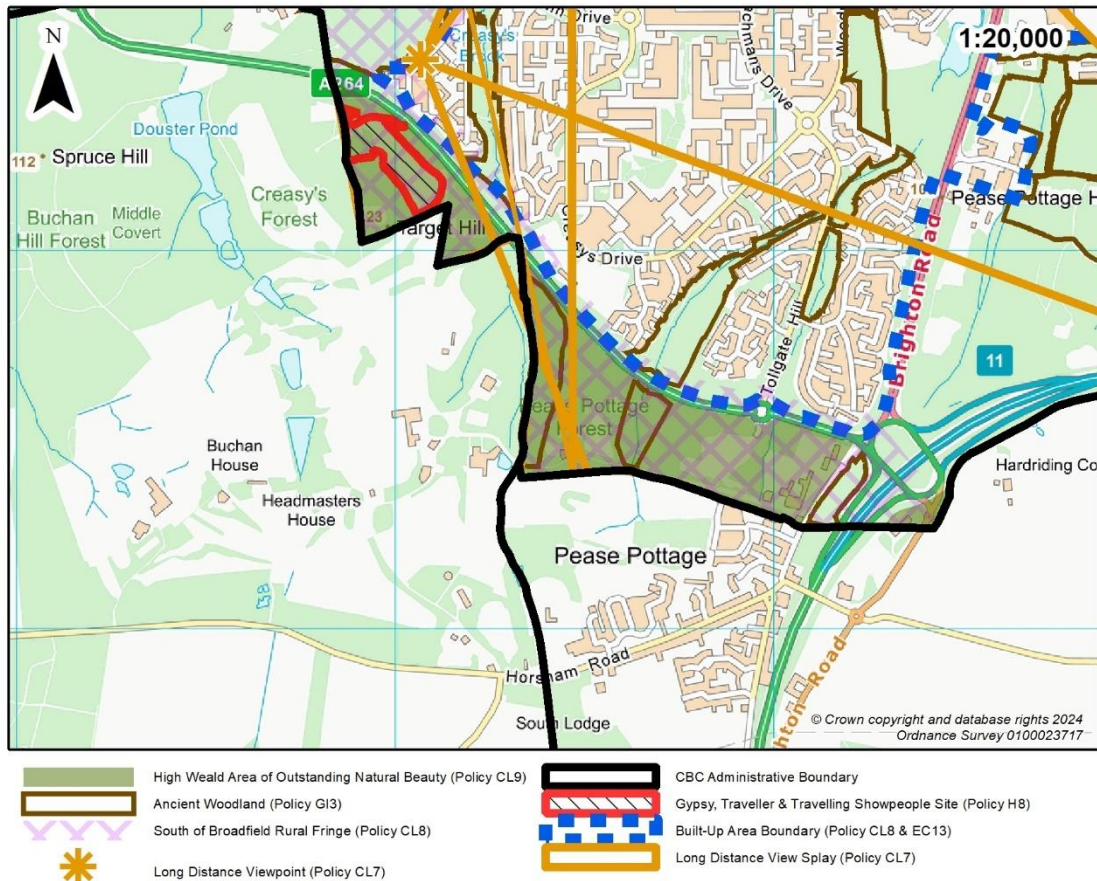
The council will conserve and enhance the natural beauty and setting of the High Weald [National Landscape](#) Area of Outstanding Natural Beauty (AONB) by having particular regard to the High Weald AONB Management Plan in determining development proposals affecting the [National Landscape](#) (AONB).

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

#### **Reasoned Justification**

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

<sup>54</sup> Business is defined as office, research & development, light industry, general industrial, or storage & distribution uses.



**Figure 11: High Weald National Landscape Area of Outstanding Natural Beauty**

- 4.73 The borough council has a statutory duty to conserve and enhance the natural beauty of the High Weald National Landscape AONB. The visual setting of the National Landscape AONB to the east is largely shielded by the M23. However, there are other impacts that could affect it such as watercourses and historic routeways. In addition, there are some areas of Ancient Woodland between Pease Pottage and the A264 and the areas further north-west form part of Buchan Park and include archaeological assets.
- 4.74 Proposals within the National Landscape AONB will be judged against the guidelines and advice of the High Weald AONB Management Plan. The Management Plan provides a transparent and accessible means by which the council can ensure that it is exercising its duty to have regard to the purposes of designation<sup>55</sup> and providing a guide for everyone involved with the actions they can take to care for the area.
- 4.75 The Management Plan, updated in 2019, establishes five defining components of character that have made the High Weald a recognisably distinct and homogenous area for at least the last 700 years: 1. Geology, landform and water systems; 2. Dispersed historic settlements; 3. Dense network of historic routeways; 4. Abundance of ancient woodland; 5. Small, irregular fields, bounded by hedgerows and woods, with distinctive zones of lowland heaths and inned river valleys.

<sup>55</sup> Section 85, Countryside and Rights of Way Act 2000

## Design & Development Requirements

- 5.1 Design continues to be an important consideration. The NPPF is clear that “*the creation of high quality buildings and places is fundamental to what the planning and development process should achieve*”<sup>56</sup>.

### Chapter Content

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

### The Key Issues

#### Design

- 5.3 Good design is key, helping make development acceptable to communities, and should be grounded in an understanding and evaluation of each area’s defining characteristics. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. It is important therefore to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces in new development as part of larger areas.
- “Well-designed buildings are carefully integrated with their surrounding external space. All private and shared external spaces including parking (see Movement), are high quality, convenient and function well. Amenity spaces have a reasonable degree of privacy. External spaces are designed to respond to local character, as appropriate solutions will vary by the context, for example whether it is a town centre or suburb”*<sup>57</sup>.

#### New Housing Development

- 5.4 The design and layout of housing has for centuries been well understood, appreciated and applied across Britain. Conversely, apartment and maisonette living lacks the same understanding or application. Apart from the positive perceptions associated with Penthouse and Loft apartments, the preference of most UK urban dwellers would be to live in a house. People generally believe that apartment living offers less conveniences and flexibility. Design and residential amenity standards need to improve as new development now has to be more compact and sustainable in order to make efficient use of land. How flats are designed, improved standards in relation to internal planning and layout, as well as the management of the common areas, are all key to changing both perceptions and the quality of apartments and maisonettes.
- “Apart from the question of privacy, the critical issues connected with living in flats can be listed under three main headings:*
- *quality of internal planning and layout;*
  - *sharing circulation spaces (that is entrances, lifts, stairs and corridors), common facilities such as refuse disposal and parking, services such as aerial systems and deliveries, and most importantly, maintenance;*
  - *aspect and orientation”*<sup>58</sup>.
- “Well-designed homes and communal areas within buildings provide a good standard and quality of internal space. This includes room sizes, floor-to-ceiling heights, internal and external storage, sunlight, daylight and ventilation. The quality of internal space needs careful consideration in higher-density developments, particularly for family*

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<sup>56</sup> National Planning Policy Framework, paragraph 126 (2021) MHCLG

<sup>57</sup> National Design Guide, page 39, ‘homes and buildings’ (2019) MHCLG

<sup>58</sup> The Housing Design Handbook (2010) David Levitt, Levitt Bernstein Architects

*accommodation, where access, privacy, daylight and external amenity space are also important... Well-designed places include a clear attention to detail. This considers how buildings operate in practice and how people access and use them on a day-to-day basis, both now and in future”<sup>59</sup>.*

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

## Local Plan Policies

### The Normal Requirements of All New Development

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

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

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

All proposals for development in Crawley will be required to:

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

<sup>59</sup> National Design Guide, pages 39-40 'Homes and buildings' (2019) MHCLG

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

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

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

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

### **Reasoned Justification**

5.8 *Further guidance on how development proposals can address all these matters can be found in relevant supplementary planning guidance produced by the council including the Residential Extensions SPD, Conservation Area Appraisals, the Manor Royal SPD, and advice on signs and advertisements. Further information on specific requirements for development applications can be found in the Local List of Planning Requirements.*

- 5.9 *A comprehensive approach can be more efficient and reduce the impact of development, ensuring that land that has a reasonable prospect of being developed is not prejudiced or restricted.*
- 5.10 *The council places particular importance on the need for all developments, whether on sites with designated features or not, to be of high quality and to protect and enhance the distinctive character and important cultural heritage of the town. Existing assets and their settings should be preserved and where possible enhanced.*
- 5.11 *Many of the decisions that influence design quality are taken at early feasibility stage and these decisions will be guided by policies in Chapter 4. The 'Building for a Healthy Life' (2020) has been developed as a tool to evaluate housing proposals in particular. To raise standards, the council will also encourage and establish design review, where appropriate and continue to prepare and update supplementary planning documents.*
- 5.12 *In order to provide good natural lighting within a new development; safeguarding of daylight and sunlight within existing buildings nearby; and the protection of daylighting of adjoining land for future development, when assessing impacts, applicants will be expected to use the 2022 BRE guidance document 'Site layout planning for daylight and sunlight'.*
- 5.13 *Community safety is an important issue in the borough and in determining whether a place is an attractive location in which to live, work or to visit. The fear or perception of crime and anti-social behaviour is also socially damaging and detrimental to the local economy. The design, location, use or change of use and operation of a wide range of proposals can make a significant contribution to community safety. Strategic Policy CL2 3c outlines the urban design principles all major applications need to apply in order to build in passive safety to development layout. In considering the design of individual buildings, the application of Secured by Design principles have been proven to achieve a significant reduction of crime risk by combining minimum standards of physical security and well-tested principles of natural surveillance and defensible space.*
- 5.14 *The Policy also seeks to ensure that development schemes identify and take account of existing landscape assets that are a positive element for the character of the town, and that landscape proposals are not dealt with as an afterthought but are progressed as an integral part of the design of the scheme. All new proposals should be mindful of the long-term future management and maintenance requirements for the development scheme and address responsibilities for this as part of any planning application. To ensure high quality public realm across the borough, irrespective of the intended management responsibility, all sites should meet standards set by the Local Authority for the purposes of their adoption as part of its amenity maintenance role. Local Authority standards will be provided to support development schemes and the preparation of management and maintenance plans.*
- 5.15 *This Policy will also ensure that retained trees that make a contribution to the streetscene are not at risk of being removed because they significantly reduce the usability of new gardens for residents or because new buildings are placed in close proximity. Tree losses through development that are accepted by the local planning authority should be mitigated by new planting.*
- 5.16 *Public art can highlight what is special or locally distinctive about an area and create cultural assets that help in the creation of interesting streets and spaces. These can add to the enjoyment of an area or help people to navigate the locality. Attractive streets and spaces can encourage other forms of investment and patronage by customers. More information regarding providing public art as part of development schemes and through*

contributions is set out in the Urban Design SPD and the associated Public Art Annex to the SPD, and in the Planning Obligations Annex attached to this Local Plan.

- 5.17 New development will be used in the Town Centre and neighbourhood centres to achieve environmental and regeneration objectives. All development, including new or altered shop fronts and advertisements, should be of a high quality design standard and reinforce the impact of improvement initiatives.

*“Well-designed public spaces, particularly streets, are designed to support an active life for everyone, and are maintained for continual use. It is important to design them to include all of the users who may wish to use them for activities such as socialising, informal doorstep play, resting and movement. Their success depends on them being fit for purpose, attractive places that people enjoy using”<sup>60</sup>.*

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

### **Inclusive Design**

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

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

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

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

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

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

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

<sup>60</sup> National Design Guide, page 31 ‘Public Spaces’ (2019) MHCLG

All dwelling extensions and in-fill developments that include a new external entrance must comply with the same Building Regulations for entrances as newly built homes. These require a level or ramped entrance and minimum door width. As with new-build homes, sensible exceptions include where proposals involve protected structures or landscape or where site conditions are difficult, such as on sloping land. Other inclusive features (downstairs toilet, 1500mm turning circle and raised power points) are strongly recommended to be incorporated, where practicable.

### **Reasoned Justification**

- 5.20 *Crawley is projected to see a notable increase in the older person population, with the total number of people age 65 and over projected to increase by 55% over the twenty years 2019 to 2039. In addition, approximately 30% of households contain at least one person with a long-term health problem or disability. It is likely that the age profile will impact upon the numbers of people with a long-term health problem or disability, and those people in the oldest age bands are more likely to experience these. Crawley's older population exceeds the West Sussex levels and is close to the national average. The Strategic Housing Market Assessment<sup>61</sup> (SHMA) indicates that the population with a long-term health problem or disability can be expected to grow by 7,000 persons by 2039; and the numbers of persons with mobility problems or dementia can be expected to grow significantly.*
- 5.21 *Many older people will continue to live in their existing homes. As it is not possible to know when a long-term health problem or disability may affect any individual, and the existing stock will continue to form the majority of housing available within the borough in the future, it is maintained that, unless there are exceptional, practical, circumstances which make meeting inclusive design criteria and, in the case of residential developments, the 'accessible and adaptable' Building Regulations levels impossible, these should be clearly illustrated on submissions as part of a planning application. The SHMA suggests a need for around 600 wheelchair user homes in Crawley in the period to 2039, which equates to about 5% of the total housing need, and provision of appropriately designed units is encouraged as part of housing schemes.*
- 5.22 *All people should be able to visit any dwelling or building with dignity. With this in mind, all new development should have at least one accessible main living space or, in non-residential situations, one visit-able room and include an accessible toilet; and be able to be entered and exited safely and easily.*
- 5.23 *Incorporating accessible entrances and other accessibility features as part of household extensions seeks to acknowledge the fact that the existing housing stock will continue to house the vast majority, yet there will be a growing need to provide more accessible housing.*
- 5.24 *Viability constraints will not be considered reasonable justification for not seeking to apply this policy, unless it can be demonstrated that consideration to meet the requirements had been taken into account from the early design and layout stages of development, and were shown to not be practicable or physically possible to achieve.*

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

- 5.25 *Crawley has a reputation for providing good quality housing. This contributes to residents' quality of life and also to the character and identity of the town. Inadequate dwellings make it difficult for residents to undertake their day-to-day living activities or*

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<sup>61</sup> Northern West Sussex Strategic Housing Market Assessment (2019) Icen Projects



adapt their homes to address changes in circumstance and can cause problems for neighbours through disturbance or a lack of privacy.

- 5.26 Internal and external space standards have been successfully applied to new housing developments in the borough over the last thirty years. Nationally Described Space Standards were introduced in October 2015 and these are set out in the Policy.

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

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

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

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

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

Notes:

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

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

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

In addition to the Nationally Described Space Standards, moderate and high density residential development is encouraged to achieve the following:

- i. Attractive communal circulation spaces which avoid long, narrow, badly-lit and ventilated internal corridors. The use of external gallery access and the use of central atria to improve natural ventilation and dual aspect, is also welcomed.
- ii. Integrated tenures with entrance lobby and cores being shared between owner-occupiers and shared ownership occupiers.
- iii. All units either dual aspect or where single aspect, south or west facing.
- iv. Units with minimum clear floor to ceiling height of 2.7m for 3 person 2 bedroom units and above or, if proven, a lower height where it suits the proportions of a narrower unit.
- v. Usable private outdoor space, at least 2.5m in depth x 4m wide, and accessed directly from main living areas or kitchen.
- vi. Secure private storage space for items such as children's bicycles, accessed from external semi private communal areas, in addition to that provided within the apartment, and made available at least to 3 person /family units, in place of the standard garden shed or attic space offered by low density housing typologies.

### **Reasoned Justification**

- 5.27 *Individuals need sufficient private space to undertake the normal functions of living together including recreational activities. The internal space standards are based on the designed level of occupancy as the number of occupants will fluctuate over the life of the dwelling. The starting point for the space standards is the need for rooms to be able to accommodate a basic set of furniture, fittings, activity and circulation space appropriate to the function of each room. The intention is to prevent the development of and cumulative effects of unsuitable homes. Designers will be able to respond to market demands in terms of how the space is used or whether higher standards are required for commercial reasons, for example to accommodate en-suite bathrooms.*
- 5.28 *Part 2 of the National Model Design Code (NMDC) provides guidance on specific elements relating to the impact of the design of homes and buildings that affect wellbeing including daylight, aspect and privacy, noise mitigation, security and access to private outdoor space.*
- 5.29 *The minimum size for each dwelling is net space including the area enclosed by unfinished faces of walls of dwellings including space taken by stairs, general storage space, partitions, chimney breasts, flues etc. but excluding garages, dustbin, fuel and bicycle stores, balconies, porches and lobbies open to the air, areas within any room with ceilings less than 1.5 metres high and any area intended to function as an access way. Minimum ceiling heights are important to ensure sufficient space and light in new dwellings, as incorporated in the space standards. However, there may be exceptional sites where this may not be appropriate in design terms, for example in Conservation Areas characterised by smaller building heights or adjacent to a Listed Building.*
- 5.30 *Sufficient external space, ideally directly accessible from the main living space or kitchen, is also required for residents, to protect the amenities of neighbours and to enable private gardens to contribute positively to the character and appearance of the area. Further guidance is provided by the Urban Design Supplementary Planning Document.*
- 5.31 *In apartment schemes, limiting the number of dwellings accessed per floor at two or three improves passive management of the common areas. However, the costs of lift provision are recognised for smaller schemes, therefore, this is only encouraged for new development of moderate density. Flats grouped around a core is usually the ideal*

arrangement. This allows for the shortest distance from front doors to lift and stairs, and avoids the need for long, narrow, badly lit and ventilated internal corridors. External gallery access is also welcomed as it has the added benefit of facilitating cross ventilation and alternative floors with dual aspect when designed in conjunction with two storey maisonettes. Dual aspect windows within apartments maximise the provision of natural light, and any single aspect units should only be south- or west-facing and, as set out in the NMDC, should not face north. Dual aspect can also be achieved by adding projecting 'bay' extensions to the main living spaces, positioned proud of the principal elevation, these 'bay' elements offer potential for glazing in two directions.

- 5.32 Developers are also encouraged to consider the needs of families in the layout of flats which differ from those of non-family households. For new residential development in excess of 80 units, an average 2 bedroom, 4 person, single storey family home should include:
- i. A Gross internal floor area of a minimum of 80sqm;
  - ii. Useable private outdoor space, large enough for the whole household to use for meals and that gets direct sunlight at some time of the day;
  - iii. Adequate additional space for recycling within the kitchen space, as per the requirements set down in 'building for life' criteria;
  - iv. A utility room with space for washing and drying appliances and an external vent;
  - v. A minimum of 4.0sqm in built storage space within the dwelling;
  - vi. Secure private storage at ground floor level;
  - vii. Flexible internal planning, to allow children to have a room of their own as they become teenagers;
  - viii. One extra living space or home office, to provide families with separate living space options. This is particularly important where units have open-plan living, kitchen, dining arrangements.

### **Tree Replacement Standards**

- 5.33 Existing trees can significantly contribute to the setting of new development, and can give the impression of early maturity and increased design quality. Development should retain individual specimens or groups of trees that make a positive contribution to visual and biodiversity amenity. This needs to be accounted for at an early stage. Where trees are agreed for removal as part of a development scheme, replacement trees will be required. This policy does not apply to Ancient Woodland or Aged Trees which must be considered against Policy GI3 and national policy and guidance. Additional new tree and landscape planting requirements for development schemes, beyond any replacement provision, should seek to assist in achieving Biodiversity Net Gain as required by Policy GI3.

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

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

- i. Trees of the highest quality (those categorised as A and B trees in the Tree Survey) should be retained as part of the proposed layout.

- ii. Trees of moderate and low value (category C and below) should not automatically be considered for removal, as they may play a useful role in site screening, or as an important habitat feature.

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

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

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

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

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

### **Reasoned Justification**

- 5.34 *Trees are considered to be a material consideration where planning permission is required. Trees existing on or adjacent to a development site (within falling distance) can present significant constraints upon development, often requiring expert advice to find an appropriate solution. Without appropriate consideration at an early stage of design, existing trees and hedges can be easily damaged and lost through development. Damage can occur to trees through thoughtless construction practices, such as vehicle collisions and root severance, as well as through more indirect factors, such as changes in the surrounding ground levels, compaction of the soil structure and contamination.*
- 5.35 *A significant loss is incurred even when a new tree is planted to replace an older one that has been felled. Depending on the species, it takes between 15 and 40 years for a tree to grow a sufficiently large canopy to deliver meaningful aesthetic, air pollution removal, rainwater management and other benefits. In terms of biodiversity, the older the tree the richer the wildlife that it supports. To ensure that adequate compensation is delivered the diameter measurement is used as a basis for the number of replacement trees that would achieve a similar canopy cover. The policy, in conjunction with the requirements of Policy GI3 on Biodiversity and Net Gain, ensures that the green character and appearance of the borough is maintained.*
- 5.36 *The cost of off-site planting by the council, in lieu of provision on-site, will be based on the cost of a sixteen to eighteen centimetre girth tree measured at 1.5m off the ground,*

planting, sundries and watering over a five year period to ensure that the tree becomes established. Where tree planting will occur within a hard paved area, the additional cost of construction for a tree pit must be funded. This is set out in the Planning Obligations Annex.

- 5.37 When planting a tree, the existing sewerage and water supply infrastructure should be taken into account, as well as the choice of appropriate tree species for the ground conditions and environment. The Green Infrastructure SPD (Appendix 6) lists appropriate species that could be planted in Crawley. Where possible, UK sourced and grown tree stock should be used to support biodiversity and resilience. Site-specifics such as ground conditions, light/sunlight and proximity to buildings and paving/footpaths must be taken into account to ensure the correct species is used for the location and purpose and does not result in nuisance or early removal of the tree. In addition, other matters for consideration include climate change resilience, pollination opportunities, carbon storage, air quality management, street use and bird strike concerns of Gatwick Airport's aerodrome safeguarding.

### **Aerodrome Safeguarding**

- 5.38 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~~ [whilst manoeuvring on the ground and](#) flying in the vicinity of the airport. This in turn helps ensure the safety of people living and working nearby.
- 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 development or construction equipment that might be used (such as cranes) which could create a potential risk to the airport aerodrome through impacts on ~~radar~~ [CNS \(Communication, Navigation & Surveillance\) equipment and Instrument Flight Procedures \(IFPs\)](#) or building induced turbulence. It also considers the potential risks to aviation created by large landscaping schemes, [the creation of new water bodies & SuDS \(Sustainable Drainage Schemes\) and large areas of flat/shallow pitched roofs](#) ~~lighting designs and new water bodies~~ which could attract birds hazardous to aviation. [Proposed lighting needs to be carefully designed to ensure that there is no impact on aircrew or Air Traffic Control \(ATC\). This is not an exhaustive list.](#)
- 5.40 As part of aerodrome safeguarding, Public Safety Zones (PSZ) are identified at either end of runways. Within these areas, development is restricted to minimise the risk of death or injury in the event of an aircraft accident on take-off or landing. The objective is that there should be no increase in the number of people living, working or congregating in PSZ areas, and that over time the number should be decreased as circumstances allow.
- 5.41 Gatwick Airport is ~~an EASA~~ [a CAA \(Civil Aviation Authority\)](#) certified aerodrome. Therefore, the council is required to consult Gatwick Airport Limited on all planning applications where aerodrome safeguarding applies. The safeguarded area is neither the responsibility nor the proposal of the local planning authority.

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

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

Where required, the Local Planning Authority will consult with the airport operator and/or the operator of technical sites (e.g. radar stations) on relevant proposals in the aerodrome safeguarded areas and in the Public Safety Zones.

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

Development that would lead to an increase in the number of people living, working or congregating within the Public Safety Zones will be refused.

### Reasoned Justification

5.42 Aerodrome safeguarding is a legal requirement by way of ICAO (International Civil Aviation Organisation) & CAA 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<sup>62</sup> 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.

5.43 Policy DD5 has been included to raise awareness of the requirements of Aerodrome Safeguarding and the Public Safety Zone, to ensure the safe operation of Gatwick Airport is taken into account in the design of development. The whole borough of Crawley is covered by the Aerodrome Safeguarding area, and this is shown on the Local Plan Map. Aerodrome Safeguarding also applies outside of Crawley Borough, and developers may need to liaise with Crawley's neighbouring Local Authorities to clarify if development is subject to Aerodrome Safeguarding outside of the Crawley administrative area.

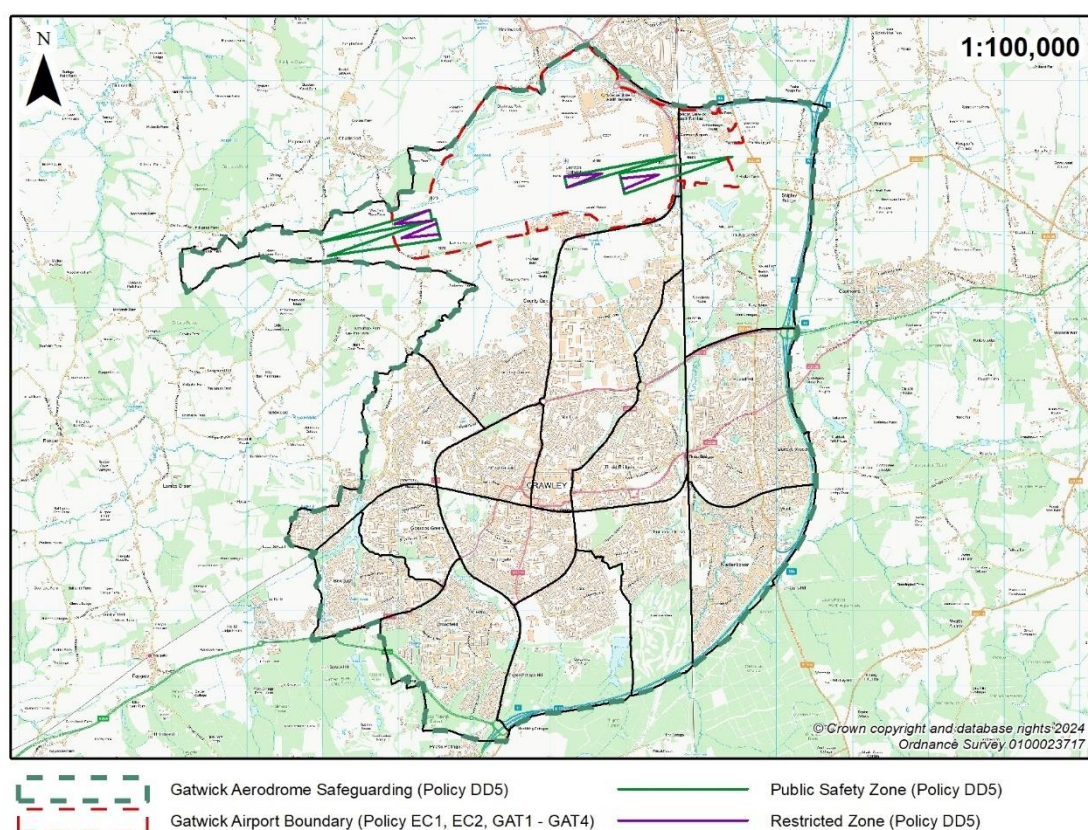


Figure 12: Gatwick Airport Aerodrome Safeguarding

<sup>62</sup> Lichfields in liaison with General Aviation Awareness Council (July 2018)

- 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 airport aerodrome, including those relating to [Communication, Navigation & Surveillance \(CNS\) equipment and Instrument Flight Procedures \(IFPs\)](#) <sup>navigation aids</sup> or on developments which may increase bird-strike risk, create building-induced turbulence or include lighting that could pose a hazard to the safe operation of the ~~airport~~ aerodrome.
- 5.45 Control of Development in Airport Public Safety Zones (Department for Transport, 2021) requires Local Plans to identify where Public Safety Zones have been established, displaying these on the Local Plan Map. For Gatwick Airport, Public Safety Zones are established in relation to both its main operational runway, and its northern standby runway. There is a general presumption against most kinds of new development and against certain changes of use and extensions to existing properties within the zones. In particular, the following development types will not be permitted:
- new or replacement dwelling houses or new non-residential development;
  - mobile homes;
  - caravan sites;
  - other residential buildings.
- 5.46 Only very specific forms of development, as identified in the government guidance document ‘Control of Development in Airport Public Safety Zones’, may be permissible within the Public Safety Zone. Where development is proposed within the Public Safety Zones, reference should be made to the government guidance.
- 5.47 Developers should refer to the Local List and also consult with ~~the~~ Gatwick Airport via [gal.safeguarding@gatwickairport.com](mailto:gal.safeguarding@gatwickairport.com) for advice on planning applications in the vicinity of the aerodrome. Developers should also refer for general awareness to the AOA (Airport Operators Association) technical aerodrome safeguarding advice notes available at [www.aoa.org.uk/policy-campaigns/operations-safety/](http://www.aoa.org.uk/policy-campaigns/operations-safety/) and [CAST \(Combined Aerodrome Safeguarding Team\) at Combined Aerodrome Safeguarding Team/Civil Aviation Authority \(caa.co.uk\)](#).

## Advertisements

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

### Policy DD6: Advertisements

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

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

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

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

### **Reasoned Justification**

- 5.49 *Poorly-designed, and inappropriately located, adverts and signs can negatively impact the visual environment and lead to clutter and visual confusion. They can also impact on light sensitive species, and on road, rail and aircraft safety. Therefore, it is important that adverts and signs are a conscious consideration and are integrated into the overall design of a development.*
- 5.50 *Digital advertising creates particular impacts due to the changing/moving images, brightness and method of display. The impact of these advertisements on visual amenity and appropriateness in sensitive landscape and townscape areas such as Conservation Areas will be carefully considered.*

### **Crossovers**

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

### **Policy DD7: Crossovers**

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

### **Reasoned Justification**

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





## Heritage Assets

- 6.1 Crawley is best known as a post-war New Town. However, the territory covered by the borough has produced evidence of human activity extending back over thousands of years. The physical remains of this activity above and below ground include assets of international, national and local importance, forming a link to a long, complex and unique history, and a focus for identity, community and learning in the context of the modern town.
- 6.2 Evidence of human activity recorded in Crawley includes local finds of Palaeolithic (Old Stone Age) and Mesolithic (Middle Stone Age) tools. The emergence of more complex forms of social organisation is signalled by finds and sites from the Later Bronze and Iron Ages. Local evidence of the Wealden iron industry extends at least as far back as the Roman period, as found at Broadfield and Goffs Park, and includes later medieval and post-medieval sites at ASDA on Pegler Way, Ifield, Worth and elsewhere. Exposed and tangible archaeological remains include iron ore pits, as at the Hawth, a range of medieval moated sites, and a deserted medieval site at Tinsley Green.
- 6.3 The present-day town is the successor of settlements established in the Anglo-Saxon period. Ifield and Worth are mentioned in the Domesday Book of 1086 and Crawley was the site of a market from 1203. These grew through the pre-industrial period, with Crawley in particular benefiting from its position on the London-Brighton highway. The coming of the railways in the 1840s promoted further development around stations at Three Bridges and Crawley, which became the main focus of pre-New Town growth.
- 6.4 An unprecedented transformation of the area was heralded in 1947 with Crawley's designation as one of eight New Towns selected to provide work and homes away from the overcrowded and bomb-damaged capital. Rapid growth followed from the 1950s onwards, initially under the aegis of Crawley Development Corporation working within the framework of Anthony Minoprio's masterplan, and latterly under the direction of a more regular system of local government.
- 6.5 Much of the historic fabric has been retained as the town has grown, resulting in a borough with a rich and diverse array of heritage assets from Grade I listed structures hundreds of years old to excellent examples of New Town architecture and planning. These elements blend to form Crawley's unique character<sup>63</sup>.

## Chapter Content

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

## The Key Issues

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

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<sup>63</sup> Detailed summaries of the character of the borough are provided in the Crawley Historic Character Assessment Report (2008), undertaken as part of the joint English Heritage (now Historic England), West and East Sussex County Councils' Extensive Urban Survey project (EUS, 2004-9); and in the Crawley Baseline Character Assessment (Edaw|Aecom, 2009).

1947. Many of these assets are locally distinctive and, therefore, it is of importance to have a clear approach for enhancing and protecting them.

## Local Plan Policies

### Crawley's Heritage Assets

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

#### Strategic Policy HA1: Heritage Assets

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

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

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

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

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

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

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

development, and any measures adopted to ensure the heritage asset is respected, preserved or enhanced or, for exceptionally significant development, relocated.

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

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

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

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

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

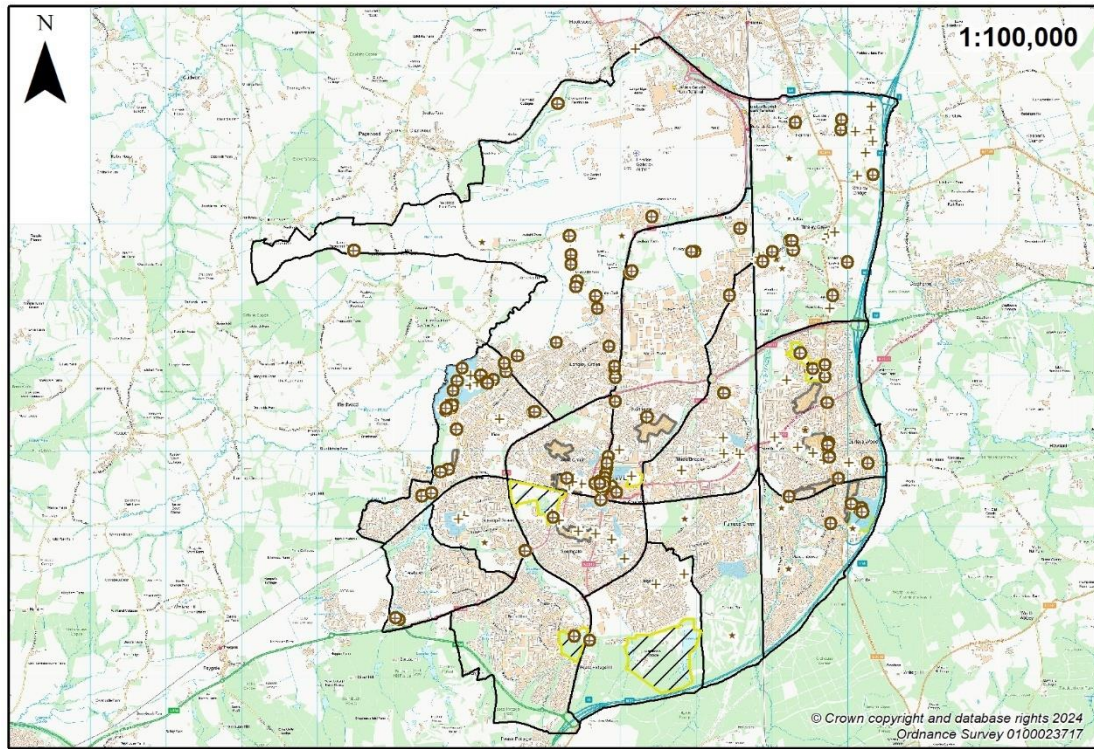
### **Reasoned Justification**

- 6.10 *To help inform the council's heritage policy approach, the Crawley Local Heritage Review (2020) reviewed and updated the borough's previous heritage evidence. Crawley Areas of Special Environmental Quality and Locally Listed Buildings Heritage Assessment (April 2010) undertook a comprehensive assessment of the town's heritage assets to review the status of Conservation Areas, Areas of Special Environmental Quality (ASEQs) now known as Areas of Special Local Character (ASLCs), Listed Building and Locally Listed Building designations. The findings from the Assessments form a key aspect of the Local Plan evidence base and should, in addition to other relevant policy documentation, be considered in the application of heritage policies.*
- 6.11 *Recording any heritage assets to an appropriate level<sup>64</sup> will ensure that a descriptive record of all heritage assets are maintained in the HER. This will in turn inform future proposals affecting heritage assets in line with the NPPF. With regard to the setting of any heritage assets, consideration should be had to Historic Environment Good Practice Advice in Planning Note 3: the Setting of Heritage Assets<sup>65</sup>.*
- 6.12 *As heritage assets within the borough are a limited and finite resource, development proposals must show through a Heritage Impact Assessment (HIA) how they preserve and enhance the asset. In the case of exceptionally significant development, the asset should be relocated as part of the development proposals. In exceptional circumstances when the asset is to be lost, it must be appropriately recorded and replaced with high quality development.*
- 6.13 *Some landscape features which enjoy policy protections for other reasons such as their contribution to biodiversity, structural landscaping, and open space may also have heritage significance, or contribute to the significance of other heritage assets, based on*

<sup>64</sup> "Understanding Historic Buildings. A Guide to Good Recording Practice" (2016) Historic England

<sup>65</sup> Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017) Historic England

their contribution to local character and their recorded and continuing social, economic and cultural significance. These may include man-made features such as open spaces (covered in Policy OS1) as well as naturally occurring ones such as ancient woodland and veteran trees (covered in Policy GI2). Where a Heritage Impact Assessment is being prepared it should include assessment of such significance where appropriate.



**Figure 13: Crawley's Heritage Assets**

### Conservation Areas

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

## Policy HA2: Conservation Areas

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

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

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

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

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

### **Reasoned Justification**

- 6.16 *Under the Planning (Listed Buildings and Conservation Areas) Act 1990, the council have a duty to determine which parts of their area are of a character or appearance of which it is desirable to preserve or enhance. They must then designate those areas as Conservation Areas. The approach to Crawley's heritage has been developed by using Historic Environment Good Practice Advice Notes 1, 2 and 3, published by Historic England.*
- 6.17 *In 2013, after a review of the borough's heritage, three new areas were designated and two existing areas were extended. In 2022, two further Conservation Areas were designated and changes were made to boundaries of another two. There are currently 13 Conservation Areas in the borough, each very different in character and appearance, protecting New Town areas and much older parts of Crawley. The Conservation Areas are:*
- Brighton Road
  - Dyers Almshouses
  - Forestfields and Shrublands
  - Gossops Green Neighbourhood Centre
  - Hazelwick Road
  - High Street
  - Ifield Village
  - Malthouse Road
  - Queens Square and The Broadway
  - St Peter's and St John's
  - Southgate Neighbourhood Centre
  - Sunnymead Flats
  - Worth.
- 6.18 *It is important to protect, maintain and enhance these areas for future generations to enjoy. The main objectives of Conservation Areas are to protect and enhance the area's*

*architectural and historic interest, its distinctive layout and appearance, and the built and natural environment. It is, therefore, important to ensure that any alterations or development are consistent with, and respectful of, the special character or appearance of the area.*

- 6.19 *The NPPF encourages the local planning authority to consider the designation of Conservation Areas and to ensure that these areas justify such status because of their special architectural or historic interest. The council has carried out a detailed assessment of the borough’s heritage and believes that the existing Conservation Areas are worthy of the status. In line with the significance and quality of these areas, the Policy sets appropriate requirements to ensure that development would result in their preservation or enhancement.*
- 6.20 *The council will from time to time review the boundaries of existing Conservation Areas and whether additional Conservation Areas should be designated, in accordance with the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF, and best practice guidance. Any such changes will be included on an updated Local Plan Map.*

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

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

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

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

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

### **Reasoned Justification**

- 6.22 *The “Crawley ASEQ’s and Locally Listed Buildings Heritage Assessment 2010” reviewed the previous Area of Special Environmental Quality designation and concluded that some should be designated, whilst others de-designated or made a Conservation Area. The following revised criteria were used for the identification of these assets:*
- i. Homogenous and cohesive character;*
  - ii. Historic landscape features;*
  - iii. Landscape value, e.g. mature trees, hedges, grass verges;*
  - iv. Lower density housing in spacious landscaped setting;*
  - v. Architectural interest.*

- 6.23 *The 2020 Crawley Conservation Areas and Non-Designated Assets Review has considered this designation and the individual assets identified. The Review recommended the following amended criteria, which are consistent with those used to identify other non-designated heritage assets, and with Historic England best practice guidance<sup>66</sup>:*
- *Authenticity;*
  - *Aesthetic/Architectural Value;*
  - *Historic Value;*
  - *Social/Communal Value;*
  - *Group Value;*
  - *Landmark/Townscape Value;*
  - *Archaeological Interest.*
- 6.24 *With these criteria in mind, the purpose of the ASLC designation is to provide an appropriate degree of protection and control in areas which possess local heritage significance.*
- 6.25 *The Local Plan Map identifies the following ASLCs:*
- *Albany Road/Spencers Road, West Green*
  - *Blackwater Lane, Pound Hill*
  - *Church Road, Pound Hill*
  - *Goffs Park Road, Southgate*
  - *Mount Close, Pound Hill*
  - *Milton Mount Avenue, Pound Hill*
  - *Northgate Neighbourhood Centre, Northgate*
  - *Rusper Road, Ifield*
  - *West Green Neighbourhood Centre, West Green*
- 6.26 *These will be included in the Local Heritage List SPD. The council will assess the merit of identifying new ASLCs through the review of the Local Plan Map and Local Heritage List, in consultation with local residents, and in accordance with robust criteria based on best-practice guidance.*
- 6.27 *The Local Plan Map and Local Heritage List may not be exhaustive in their inclusion of heritage assets which in fact possess significance in line with the stated criteria. Given the long history of human settlement and activity in the Crawley area, and the ongoing transformation of the environment through the urban development of the borough, further assets may come to light, including as part of the planning and development processes. This is particularly likely in the vicinity of existing groups of designated and non-designated heritage assets.*
- 6.28 *The NPPF<sup>67</sup> asks local authorities to set out a positive strategy for the conservation and enjoyment of the historic environment; this Policy achieves this by identifying special local heritage assets that should be preserved or enhanced and setting out the criteria required to achieve this.*

### **Listed Buildings and Structures**

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

<sup>66</sup> Local Heritage Listing: Historic England Advice Note 7 (2016) Historic England

<sup>67</sup> National Planning Policy Framework, paragraph 190 (2021) MHCLG



## Policy HA4: Listed Buildings and Structures

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

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

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

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

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

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

### **Reasoned Justification**

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

### **Locally Listed Buildings**

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

## Policy HA5: Locally Listed Buildings

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

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

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

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

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

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

### **Reasoned Justification**

6.32 *National planning guidance states that while the best examples of local vernacular building types will normally be listed, there are many other buildings which are valued for their contribution to the local scene or for their local historical association. It suggests that local planning authorities draw up lists of locally important buildings and formulate policies for their protection.*

6.33 *Crawley Borough Council previously revised its list of Locally Listed Buildings in 2010, when 58 buildings of local interest were identified. The adopted local list of buildings can be found on the council's website at [www.crawley.gov.uk](http://www.crawley.gov.uk).*

6.34 *The 2010 Local Buildings List will be superseded by the council's updated Local Heritage List, which will be based on assessment of heritage significance against the following criteria, taking account of the recommendations of the Local Heritage Review (2020), which are consistent with those used to identify other non-designated heritage assets, and with Historic England guidance on Local Listing<sup>68</sup>, to ensure consistency with similar local and national surveys:*

- Age;
- Authenticity;
- Aesthetic/ Architectural Value;
- Historic Value;
- Social/Communal Value;
- Group Value;
- Landmark/Townscape Value;
- Archaeological Interest.

<sup>68</sup> Local Heritage Listing: Historic England Advice Note 7 (2016) Historic England

- 6.35 *The council will assess the merit of adding new locally listed buildings in consultation with local residents, and in accordance with robust criteria based on best-practice guidance, through the review of the Local Heritage List.*
- 6.36 *The Local Heritage List may not be exhaustive in its inclusion of heritage assets which in fact possess significance in line with these criteria. Given the long history of human settlement and activity in the Crawley area, and the ongoing transformation of the environment through the urban development of the borough, further assets may come to light, including as part of the planning and development processes. This is particularly likely in the vicinity of existing groups of designated and non-designated heritage assets.*

### **Historic Parks and Gardens**

- 6.37 Whilst Crawley does not have any Parks and Gardens of Special Historic Interest that are designated as nationally important by Historic England, the borough does contain man-made recreational landscapes which are of local importance from a heritage perspective. These Historic Parks and Gardens are local or ‘non-designated’ heritage assets identified on the Local Plan Map and in the council’s Local Heritage List.
- 6.38 Historic Parks and Gardens are worthy of protection in the Crawley context for their heritage significance, including variously their age and rarity; their historic, archaeological, artistic and architectural interest; and their group value. This does not mean that development is always unsuitable in these areas but that the historic setting and character of that area must be respected or enhanced. Some Parks and Gardens are of particular interest as they were important features of the area before the development of the New Town, and some are intrinsically linked with the development of the New Town. These areas are now attractive landscaped areas which are locally valued, adding to the local character of Crawley.

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

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

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

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

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

### **Reasoned Justification**

- 6.39 *The identification of the Historic Parks and Gardens is supported by the 2020 Crawley Conservation Areas and Non-Designated Assets Review. The Review has recommended the identification of Historic Parks and Gardens on the basis of the following sub-criteria, which are consistent with the criteria used to identify other non-designated heritage assets, and with Historic England best practice guidance, while also reflecting*

*in a proportionate way the criteria for designation of Nationally Registered Parks and Gardens<sup>69</sup>:*

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

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

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

6.41 *The council will assess the merit of identifying new Historic Parks and Gardens through the review of the Local Plan Map and Local Heritage List, in consultation with local residents, and in accordance with robust criteria based on best-practice guidance. The council will ensure that the concept of Historic Parks and Gardens is not devalued by only designating those areas of special interest identified through a robust assessment of their historic interest. The council assessment and the requirement for a Heritage Impact Assessment will serve to avoid or minimise conflict between the conservation of a Historic Park and Garden and any aspect of a planning proposal. This will ensure a balanced judgement is made having regard to the scale of any harm or loss and the significance of the heritage asset.*

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

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

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

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

Development proposals in the vicinity of a Scheduled Monument, or any heritage asset with archaeological interest which is demonstrably of equivalent significance (i.e. 'designated')

<sup>69</sup> Local Heritage Listing: Historic England Advice Note 7 (2016) Historic England; Urban Landscapes: Historic Parks and Gardens Selection Guide (2018) Historic England

archaeological assets), will be expected to preserve or enhance the asset and its setting, including through the protection of the asset from disturbance associated with development activity, and through the avoidance of patterns of movement or land use which may cause harm to, or loss of, the significance of an asset over time. Development should identify and pursue opportunities to better reveal the significance of such assets.

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

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

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

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

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

### **Reasoned Justification**

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

## Open Space, Sport & Recreation

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

### Chapter Content

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

### The Key Issues

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

### Local Plan Policies

#### Sport, Recreation and Open Space

- 7.5 This policy sets out the criteria the council will use to determine proposals that affect open space, sport and recreation provision.
- 7.6 It is important to ensure that there is an adequate supply of open space to serve the needs of both the existing and the future population of the borough. The Open Space, Sport and Recreation Assessment, Indoor Sports Facilities Assessment and Playing Pitch Strategy (2020) identified the standards for sport and recreation provision in the borough based on an assessment of the adequacy of existing provision, and the need for future sport and recreation development defined through consultation.
- 7.7 Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision<sup>70</sup>.

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

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

<sup>70</sup> National Planning Policy Framework, paragraph 98 (2021) MHCLG

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

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

### **Reasoned Justification**

7.8 *Determining what open space, sport and recreation provision is needed (including the qualitative and quantitative deficits or surpluses) is a requirement set out in the NPPF<sup>71</sup>.*

7.9 *For the purposes of this policy, open space, sport and recreation facilities broadly fall into the following typologies:*

- *Indoor sports facilities;*
- *Parks and gardens;*
- *Natural and semi-natural open spaces;*
- *Amenity green space;*
- *Provision for children;*
- *Provision for young people;*
- *Outdoor sports facilities;*
- *Allotments;*
- *Cemeteries and churchyards;*
- *Civic spaces;*
- *Green corridors.*

7.10 *The Open Space, Sport and Recreation Assessment, Indoor Sports Facilities Assessment and Playing Pitch Strategy (2020) establish Crawley's specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities. The standards within the studies provide guidance on where future provision of open space and recreation facilities is to be provided and where current provision is to be maintained.*

7.11 *Overall, Crawley is relatively well catered for with open space areas. However, distribution can be uneven which means that in some locations residents have further to travel to enjoy particular types of open space. The Open Space Assessment highlights the open space distribution by neighbourhood area. Whilst some open space is strategic in nature and the provision across the whole borough should be taken into account, this can be used as a starting point for understanding the needs of a specific location.*

7.12 *The studies identify a future deficit in most types of open space across the borough by 2035 and, with an increasing population, this will continue to be the case in the latter five years of the Plan period. To improve access and quality of Open Spaces, recommendations set out in each of the studies are to be integrated into designs for proposals at an early stage.*

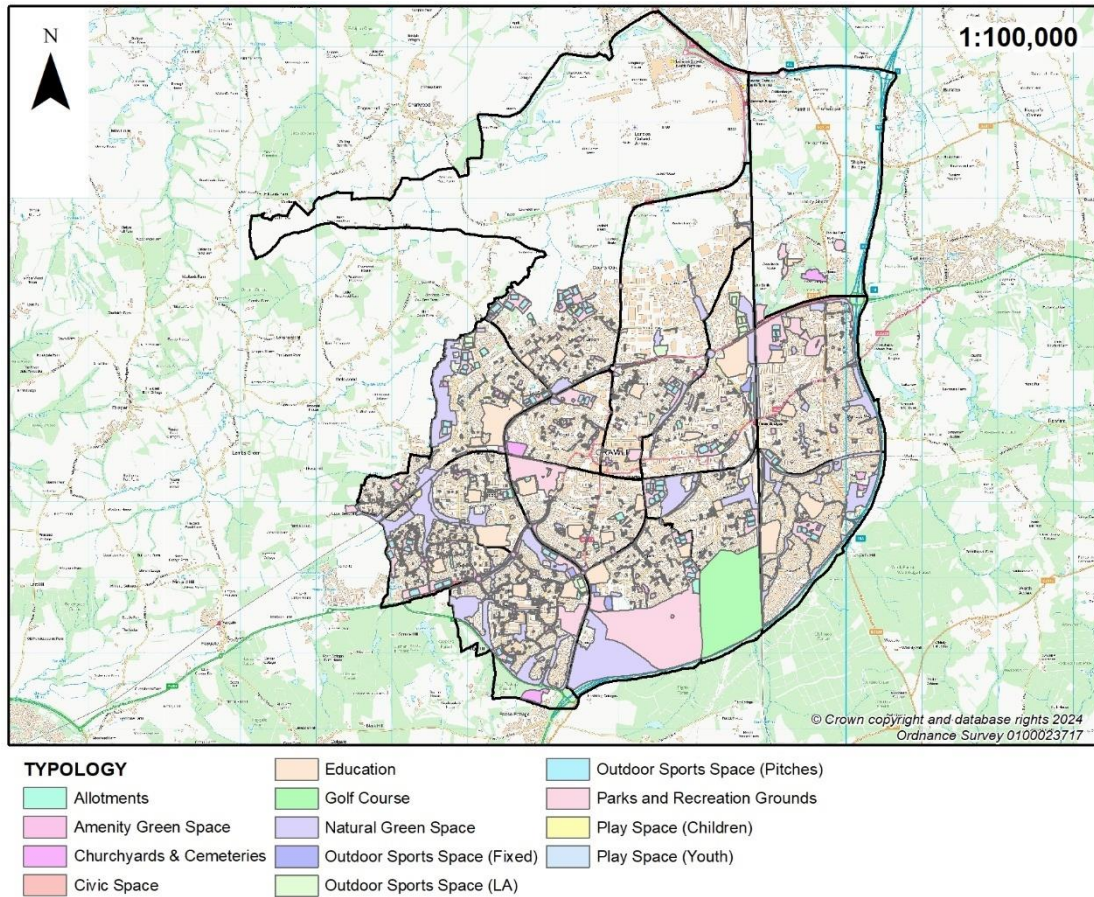
<sup>71</sup> National Planning Policy Framework, paragraph 98 (2021) MHCLG

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

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

- 7.14 The Open Space Study concludes that, where a proposed planning application shows that it would result in the loss of an open space, a quantity assessment should be carried out to understand if this would create a deficiency in that type of open space.
- 7.15 Where a quantity assessment evidences no deficiency, an assessment of the open space's historical, cultural, visual, amenity and ecological value should be undertaken to understand the full ramifications of its loss, including impact to the wider green infrastructure functions. The local planning authority will consider the quality and value of the site within the decision making process by considering:
- the quality and value assessment made as part of the council's Open Space Assessment (if the site was included in the full quality and value assessment), this will highlight what the loss would be in terms on the quality of the site and its values;
  - any planning designations that apply to site, for example, is the site within a Conservation Area or in the setting of a Listed Building;
  - all matters covered by an Environmental Impact Assessment, if appropriate.
- 7.16 The Open Space, Sport and Recreation Studies have mapped and audited Amenity and Natural Green Spaces larger than 0.2 ha. Sites smaller than 0.2 ha typically consist of roadside verges, roundabouts and incidental areas of grass. These sites are important contributions to the green infrastructure network within Crawley and can be areas of improvements to green infrastructure and biodiversity in line with Policy GI3. Proposals which affect these areas will also be considered against amenity impacts set out in Policy DD1. Replacement for the loss of these smaller sites, by equivalent or better provision of open space, can be provided in the form of smaller parcels, including areas smaller than 0.2 ha, where the loss is considered not to have an unacceptable harmful impact. However, for amenity and natural green spaces an assessment is only required for sites larger than 0.2 ha.





**Figure 14: Crawley's Open Space Sites**

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

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

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

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

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

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

secure the replacement open space and to provide and improve the Public Rights of Way network both within the development and connecting to the surrounding countryside/open spaces.

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

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

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

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

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

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

### **Reasoned Justification**

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

7.20 *Recommendations from updated Open Space Studies include:*

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

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

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

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

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

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

7.23 Access to natural greenspace is explained in more detail in Policy G11, including Natural England’s Accessible Natural Green Space Standard recommendations, the Woodland Trust’s Woodland Access Standard and the council’s local natural greenspace standard.

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

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

7.25 Public Rights of Way contribute to the character of the town by providing a means of active travel for residents and visitors as well as a recreational use. They provide a route for a sustainable means of transport to improve the physical and mental health of residents in Crawley. In order to ensure that public access to the countryside and the

urban network of rights of way is maintained and enhanced, the council, as a local planning authority, will protect Public Rights of Way including footpaths, bridleways, byways and unclassified country roads.

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

Public Rights of Way will be protected by ensuring that development does not result in the loss of, or adversely affect, a Right of Way or other recreational route, unless a new route is provided of equal or better value. When a planning application affects a Public Right of Way, then the application should enhance the Public Right of Way and, where appropriate, improve access to the countryside.

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

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

This may include:

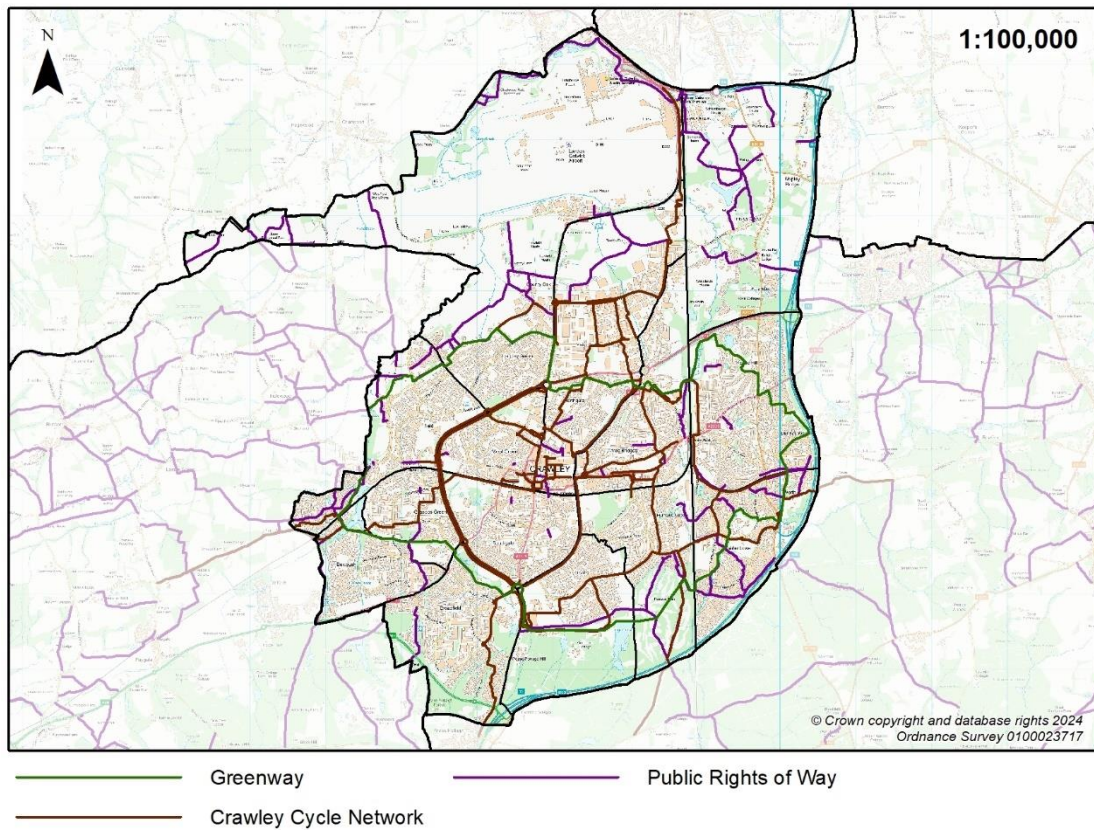
- i) the provision of safe and convenient links to nearby Rights of Way/recreational routes; and/or
- ii) new or upgraded existing Rights of Way to multi-functional routes which improve environmental functions and visual amenity to create benefits for a range of users, such as for Non-Motorised Users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

#### **Reasoned Justification**

- 7.26 *The NPPF<sup>72</sup> requires local planning authorities to protect and enhance Public Rights of Way and seek opportunities to provide better facilities for users. Public Rights of Ways are an important network of roads and minor roads that facilitate safe travel for vulnerable users, walkers, cyclists and equestrians.*
- 7.27 *The footpath, cycle and bridleway links within and between neighbourhoods and from the town into the wider countryside form an important recreational role for the borough's residents and visitors. The importance of access to the countryside and the need to improve it, is emphasised in the West Sussex Rights of Way Improvement Plan and accompanying Project List. Although predominantly used for leisure activities, the Public Rights of Way network can also provide valuable intra-urban movements and schemes should also take full account of any existing Public Rights of Way within the borough. Improvements for motorised disability users would need to be carefully designed to ensure access is prevented for other motorised vehicles.*
- 7.28 *The map below shows the current extent of Public Rights of Way (2019) in Crawley and surrounding boroughs as well as Crawley's Cycle Network and the Greenway that runs in a circle around Crawley. It is important to enhance sustainable transport options through well maintained PROW's. The map provides baseline evidence to where contributions towards Public Rights of Ways can be spent, for example, where increasing access to an area of open space through a PROW improvement can benefit the quality of life of new and existing residents living nearby.*

<sup>72</sup> National Planning Policy Framework, paragraph 100 (2021) MHCLG

7.29 Several opportunities to enhance Crawley’s PROW network are listed in the Green Infrastructure SPD<sup>73</sup>. Another positive approach would be to increase and enhance connections to Crawley’s Greenway which is a circular route around the borough, taking into account the various types of users for a Public Right of Way. Another enhancement that would be positive for Public Rights of Way is improving accessibility for all users. However, individual site assessments should also consider what open space, sport and recreation activities and spaces are available within close proximity, using the council’s accessibility standards, to a development’s location.



**Figure 15: Public Rights of Way and Access Corridors in Crawley**

<sup>73</sup> Green Infrastructure Supplementary Planning Document, pages 11-13 (2016) CBC

## Infrastructure Provision

- 8.1 The retention of essential infrastructure and the provision of additional facilities and services to support new development is a key objective of the planning system. It is important to retain, and where possible enhance, existing essential infrastructure in the borough taking into account new innovations and the need to respond to climate change.
- 8.2 A complete picture of the provision of infrastructure in Crawley is contained in the Crawley Infrastructure Plan (~~May~~ July 2023) which supports the Local Plan Review.
- 8.3 As significant parts of the town's infrastructure are not actually provided by the borough council, it is important that the council continues to work closely with West Sussex County Council and utility and service providers (such as water providers, communication companies etc.) to ensure that the necessary infrastructure is in place for the lifetime of the Plan.

### Chapter Content

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

### The Key Issues

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

### Local Plan Policies

#### Infrastructure Provision

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

## Strategic Policy IN1: Infrastructure Provision

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

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

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

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

**Reference should be made to the council's Infrastructure Delivery Schedule (IDS) and its updates which identify the Infrastructure projects supporting the Local Plan, and arrangements for their phasing, funding, and delivery. Developments which are required to submit a Transport Assessment in accordance with Policy ST1 should make reference to the IDS and its updates, and to Authority Monitoring Report updates on the implementation of these, in demonstrating the acceptability of their proposals. The need for improved transport infrastructure should be based on up to date information about travel demand as part of the 'monitor and manage' process.**

### Reasoned Justification

- 8.7 *Infrastructure covers a wide range of services and facilities such as transport, education, health, social infrastructure, community facilities, cultural facilities, sport centres, open space, parks and play space, blue infrastructure, waste management and disposal, libraries, cemeteries, emergency services, places of worship, utility services, waste water treatment, telecommunications infrastructure and flood defences.*
- 8.8 *It is important that the necessary infrastructure and community services are made available for the whole community, for everyone to enjoy a high quality of life. The NPPF highlights the role that the planning system can play in identifying and coordinating the provision of infrastructure<sup>74</sup> and requires strategic policies to make sufficient provision for infrastructure<sup>75</sup>. The Infrastructure Plan (**including the Infrastructure Delivery Schedule**) sets out in more detail an assessment of infrastructure provision in Crawley, **and the additional infrastructure required in order to support the Local Plan strategy.** **These-f** Facilities which make a contribution to the provision of infrastructure provision in the town will be protected unless alternative provisions are made. Where alternative provision is made this should be suitably located in terms of the functional requirements of the facility and the access requirements of the communities served, whether this be within or outside the boundary.*

<sup>74</sup> National Planning Policy Framework, paragraph 8a) (2021) MHCLG

<sup>75</sup> National Planning Policy Framework, paragraph 20b) (2021) MHCLG

- 8.9 *It is a fact that development will place additional demands on infrastructure provision and that developers will be expected to contribute to meeting the need for additional infrastructure generated by their development and ensuring cumulative effects are effectively mitigated. Development will be permitted where overall capacity limits, advised by infrastructure providers, are not breached. **The council will work proactively with infrastructure providers and developers to support the delivery of the improvements and facilities required to deliver the Local Plan strategy, and opportunities to secure additional funding will be explored through proactive engagement with government agencies, other public sector organisations, and private investors. The council will convene a (nominally titled) Transport Infrastructure Management Group to keep the effectiveness, deliverability, and phasing of the transport infrastructure projects required to deliver the Local Plan strategy under review, as part of a ‘monitor and manage’ process. The Group will include West Sussex County Council and National Highways (as appropriate), and its findings will inform future updates to the Infrastructure Plan: Appendix 2 (Infrastructure Delivery Schedule), and the council’s Authority Monitoring Report.***
- 8.10 *The council will charge developers the Community Infrastructure Levy (CIL) on appropriate development, in accordance with the council’s adopted CIL Charging Schedule and the CIL Regulations (2010) as amended, **and CIL funds will be used to contribute towards meeting needs identified in the Infrastructure Plan.** Developers will also be required to address relevant site-specific issues and direct impacts on infrastructure and, subject to the relevant tests set out in CIL Regulation 122, these will be addressed through Section 106 agreements requiring on-site delivery and/or a financial contribution towards off-site provision. The Planning Obligations Annex sets out the charges and calculations anticipated from the planning policies in this Local Plan and these have been subject to viability testing as part of the whole Plan and CIL Viability assessment, to support the Local Plan. The council’s adopted Supplementary Planning Documents provide additional guidance on the use of S106 agreements.*
- 8.10~~1~~ *As required by the CIL Regulations the council will publish an annual Infrastructure Funding Statement concerning developer contributions. Statements for each financial year will be published before the end of the following December. They will set out the information required by the CIL Regulations, including:*
- *An ‘Infrastructure List’, identifying infrastructure projects or types of infrastructure which the council intends will be, or may be, wholly or partly funded by CIL;*
  - *A ‘CIL Report’, detailing CIL receipts, allocations and expenditure;*
  - *A ‘Section 106 Report’, including details of new planning obligations (‘Section 106 agreements’) entered into, as well as details of receipts, allocations and expenditure.*
- 8.10~~2~~ *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. As a developer has the automatic right to connect to the sewer network under the Water Industry Act, the Infrastructure Provider may request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the*



development. This will avoid adverse environmental impacts such as sewer flooding and/or water pollution. It will be important to ensure that growth is aligned with delivery of additional capacity at Crawley Wastewater Treatment Works. 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<sup>76</sup>.

## New Infrastructure Provision

8.1~~2~~<sup>3</sup> The Infrastructure Plan provides an assessment of infrastructure in Crawley and whether new or additional facilities will need to be provided to support the town and its growth.

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

The council will support the provision of new or improved Infrastructure in appropriate locations where the facilities are required to support development, where they improve the medium- or longer-term resilience of infrastructure in Crawley, or where they add to the range and quality of facilities in the town. [The council's Infrastructure Delivery Schedule \(IDS\) and its updates identify a range of infrastructure projects aligned with these objectives.](#)

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

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

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

Major facilities providing services on sites which are accessed by the whole town or wider area should be located in the most sustainable locations accessible by [public transport and/or active travel routes](#) ~~a variety of means of transport.~~

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

## Reasoned Justification

8.1~~3~~<sup>4</sup> The NPPF highlights the need to make provision for sufficient infrastructure to support residents and businesses. As has been identified earlier, infrastructure covers a wide

<sup>76</sup> [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](https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity)

*range of services and facilities. Where new facilities and services are provided, consideration needs to be given to their location depending on the number of trips generated and the use of the facility. The proposals will also need to be assessed against general development management policies.*

- 8.14~~5~~<sup>5</sup> *The Infrastructure Plan recognises that there is an estimated need for around 4-6 ~~6-8~~ additional forms of entry at secondary school level in Crawley during the course of the Plan and a new secondary school is therefore likely to be needed in the area. Due to Crawley's tightly constrained land supply, discussions are ongoing with WSCC and neighbouring authorities to consider secondary school provision to meet Crawley's needs as part of new strategic development close to Crawley. However, the Policy also makes allowance for consideration of education provision on sites within the borough allocated for uses including housing, should it not be possible to be met on an alternative site, particularly those currently or previously in education use.*
- 8.15~~6~~<sup>6</sup> *Infrastructure facilities which generate a significant number of trips should be located in the most sustainable location where they can benefit from good public transport access and other suitable forms of transport.*
- 8.16~~7~~<sup>7</sup> *Infrastructure which serves a neighbourhood catchment should be located close to neighbourhood centres. This will help maximise the accessibility of the site by foot and cycle as well as by public transport.*
- 8.17~~8~~<sup>8</sup> *Other forms of infrastructure facilities which provide services but do not generate significant number of trips should be located in the most appropriate location, taking into account their impact on adjoining uses.*

### **Telecommunications and Broadband Provision**

- 8.18~~9~~<sup>9</sup> *The planning system is required to support the expansion of telecommunications and increased coverage of gigabit-capable full fibre infrastructure. This is needed to support technologies such as 5G, by prioritising full fibre connections to existing and new developments. Access to high quality digital infrastructure, and providing access to services from a range of providers, is important both in supporting economic growth and enhancing the provision to local communities.*
- 8.19~~20~~<sup>20</sup> *In order to innovate, differentiate and add value as the demand for digital services increases consumer and business demand for gigabit-capable infrastructure, it will be important to provide full fibre deployment to every premises. Consumers are demanding a greater choice of suppliers, increased speeds and data transmission, and the demands of future technologies such as 5G will rely on accessible high quality fibre infrastructure.*
- 8.20~~1~~<sup>1</sup> *Retrofitting full fibre broadband into existing development is a costly and disruptive process. Therefore, measures to incorporate the fibre optic cables directly into new development, as part of the construction process, is required.*

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

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

#### **Reasoned Justification**

- 8.21~~2~~<sup>2</sup> *Through its Industrial Strategy, the government has expressly focused on building a 'full fibre future for Britain' to deliver digital infrastructure capable of providing today what*

*the next generation will need tomorrow. The NPPF is clear that planning policies should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections<sup>77</sup>.*

- 8.233** *Crawley is part of the Greater Brighton Economic Region, one of the fastest growing city regions in the UK with a strong knowledge-based economy. A consistent message from businesses is that under-investment in infrastructure blocks growth and deters inward investment. This is reflected in Gatwick 360°, the Coast to Capital LEP Strategic Economic Plan, which identifies need to prioritise investment in a new standard of full fibre broadband connectivity between economic hubs, and the Gatwick Diamond Local Strategic Statement, which identifies the continued development and roll-out of superfast broadband as central to the promotion of sustainable economic growth across the Gatwick Diamond. Without the required level of investment, including in digital infrastructure, the full growth potential in the area will not be achieved. Exclusion from access to broadband can also reduce access to public services and employment opportunities, result in social isolation and can mean that people may not be able to benefit from discounts for online billing or payments.*
- 8.234** *The councils in West Sussex share an ambition to increase coverage of digital infrastructure providing gigabit-capable broadband speeds and connectivity. Working together the councils recognise that high quality digital infrastructure is a significant factor in attracting inward investment and enabling economic growth.*
- 8.245** *The councils in the county have invested in new duct and dark fibre infrastructure linking key urban centres, from Crawley in the north of the county to Brighton on the South Coast, which is available to the market to lease. The network has the potential to unlock further fibre deployments to premises but could also be a significant enabler for regional connectivity as the demand for scalable, cost-effective bandwidth with low latency increases. The network links economic hubs and sites of strategic development and will enable businesses to access internet services and also form private networks that support innovation and collaboration.*

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<sup>77</sup> National Planning Policy Framework, paragraph 114 (2021) MHCLG

# Economic Growth & Social Mobility

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

*As a progressive town, Crawley will strive to be the premier town between London and the South Coast providing jobs, learning and development opportunities and a leisure and cultural offer that is attractive to residents and visitors. Crawley will continue to be an economic leader, with a diverse, resilient and productive economy that meets the needs of the borough and 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 supported 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.*

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

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



## Economic Growth

- 9.1 Crawley is firmly established as one of the key economic drivers in the South East of England. The borough represents the geographic and economic heart of both the Gatwick Diamond sub-region and the wider Coast to Capital Local Enterprise Partnership (LEP) area, and through its excellent transport links Crawley continues to be well connected internally, nationally and internationally. It is home to a major international airport at Gatwick and Manor Royal, the region's premier business destination, employs over 30,000 people across an area of 240 hectares. Both are key drivers of the Crawley economy and that of the wider area. Development of key mixed use sites is revitalising the Town Centre as a place to do business, whilst the borough's other main employment areas continue to perform an important economic function.
- 9.2 The Gatwick 360° Strategic Economic Plan 2018-2030, prepared by the Coast to Capital Local Enterprise Partnership, sets out the economic vision that Crawley, alongside the region's other major urban centres, will be ranked among the most productive places in the UK. Key to achieving this is the supporting of economic growth through delivery of new business space and facilities, improved connectivity (including digital) and infrastructure, and supporting the necessary skills for a global economy, providing high-quality, well-paid jobs in the decades to come.
- 9.3 To promote the continued prosperity of the Gatwick Diamond and plan for its future growth, a Gatwick Diamond Local Strategic Statement<sup>78</sup> (LSS) has been prepared on a joint basis and endorsed by the two county councils and six local authorities covered by the area. The Statement sets out a commitment among local authorities to work together to promote the economic function of the Gatwick Diamond, recognising the strength of Crawley/Gatwick as a business location. Dovetailing with LEP objectives, the Gatwick Diamond LSS establishes priorities to support delivery of the floorspace needed for new and growing businesses, the skills needed to enable communities to access job opportunities within the Diamond, and the infrastructure to support sustainable economic growth. Crawley is also an active member of the Greater Brighton Economic Board, and the West Sussex and Greater Brighton Strategic Planning Board, working strategically across the LEP area to maximise economic and social outcomes whilst addressing challenges faced by the area.
- 9.4 The success of Crawley's economy, and that of the wider Gatwick Diamond and Coast to Capital LEP, is significantly driven by Gatwick Airport, which is recognised by Coast to Capital as accounting for £2.7 billion of economic activity in the LEP area. The COVID-19 pandemic impacted substantially on the aviation sector and related businesses, with Centre for Cities (2020)<sup>79</sup> estimating over half the borough's jobs to fall within very vulnerable or vulnerable sectors. This in turn impacted directly on Crawley's economy, with 25,800 Crawley residents (41% of the local workforce) furloughed, and Local Universal Credit claimant count peaking at 8.9% in March 2021.
- 9.5 Crawley's economy has though proven to be resilient and continues to trend towards recovery. It is vital that economic recovery and growth continues to be supported, and interventions identified in the "One Town Crawley Economic Recovery Plan<sup>80</sup>" (2021) include the unlocking of sufficient suitable employment land to provide for employment

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<sup>78</sup> Gatwick Diamond Local Strategic Statement 2016 (April 2017) Chilmark Consulting on behalf of the Gatwick Diamond Authorities

<sup>79</sup> Centre for Cities (April 2020) What does the COVID-19 crisis mean for the economies of British cities and large towns?

<sup>80</sup> One Town Crawley Economic Recovery Plan Dec 2021 <https://crawley.gov.uk/sites/default/files/2021-12/One%20Town%20Crawley%20Economic%20Recovery%20Plan.pdf>

growth sectors and help boost jobs for residents, increasing the borough's overall economic resilience, supporting a green economy, and promoting skills development and town centre renewal. There remains significant need for new business land and floorspace identified over the period to 2040. Given the significant land supply constraints faced within the borough, the Local Plan sets out a pro-active and ambitious economic strategy to support continued economic recovery in the shorter-term, whilst planning positively for the economic growth and diversification that is needed to ensure a strong, competitive and resilient economy moving forward.

## Chapter Content

- 9.6 This chapter sets out a coordinated approach, through strategic and spatial policies, that will enable Crawley to build on its economic strengths, maximise opportunities for growth and respond pro-actively to the challenges the borough faces over the Plan period. Drawing upon on the 2020 Northern West Sussex Economic Growth Assessments and 2023 Crawley focused update the chapter sets out Crawley's employment land and floorspace needs over the period between ~~2024~~ 2023 and 2040, and outlines the strategy through which economic needs will be planned for. Ongoing economic recovery remains a priority with policies in place to deliver employment growth, adaptability, and support residents and businesses through improved access to training and employment opportunities. Through the policies in this chapter, and those set out in the following chapters relating to the Town Centre and Gatwick Airport, the Local Plan sets out the economic strategy to deliver sustainable economic growth in Crawley over the next 16 years.

## The Key Issues

- 9.7 The NPPF is clear that planning policies should help create the conditions in which businesses can invest, expand and adapt, setting out a clear economic vision and strategy that positively and proactively encourages sustainable economic growth<sup>81</sup>. As Crawley's economy continues its recovery from the pandemic, the Local Plan must look forward, planning pro-actively to meet Crawley's significant job growth, business land and floorspace needs, whilst supporting delivery of the upskilling, connectivity and supporting infrastructure needed to support economic growth.
- 9.8 Crawley borough is the leading economic driver in the Gatwick Diamond, forming the economic heart of the Coast to Capital Local Enterprise Partnership and Gatwick Diamond areas. With new businesses seeking to locate in the borough and existing businesses wishing to grow, there is a need for a minimum of 26.2ha new employment land in Crawley over the period to 2040. The scope to accommodate identified employment needs in Crawley has been severely constrained by the limited available land supply, this being significantly affected by the requirement to safeguard land in the north of the borough for a possible southern runway at Gatwick Airport. There remains a risk that if Crawley's employment needs cannot be accommodated within the borough, investment may be lost outside of Crawley, and indeed the sub-region entirely. It is therefore vital that a robust strategy is in place which plans positively to meet Crawley's employment needs and supports the continued economic success of Crawley within the wider Gatwick Diamond and Coast to Capital areas.
- 9.9 To accommodate Crawley's employment needs, the Local Plan strategy focuses on the protection and intensification of the borough's existing main employment areas, and the identification of new employment land. Manor Royal will remain the economic heart

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<sup>81</sup> National Planning Policy Framework, paragraph 82a) (2021) MHCLG

of the Gatwick Diamond, and is protected and promoted for office, industrial and storage & distribution-led economic growth to build upon and reinforce its established role and function as the Gatwick Diamond's leading business destination. To accommodate Crawley's significant requirements for industrial and warehouse land, a Strategic Employment Location is allocated at Gatwick Green, with the safeguarded land boundary amended accordingly. Smaller scale, appropriate extensions to Manor Royal, located outside of the Gatwick safeguarded land, will also be supported to provide flexibility and enable Manor Royal to adapt. Crawley's other designated main employment areas will remain the focus for a broad range of employment uses, and will be protected and intensified for economic growth to maximise the available employment land supply and ensure that their economic function is not undermined.

- 9.10 Dovetailing with the Economic Recovery Plan, a pro-active approach is taken to adapt to economic challenges and respond to Coast to Capital LEP and Gatwick Diamond Initiative objectives. A key focus is the unlocking of sufficient suitable land to meet Crawley's employment needs in full, boosting jobs opportunities for residents. Linked to this, enabling local access to skills and training is a priority, and a dedicated policy ensures that new development takes the opportunity to support workforce upskilling. Flexibility is provided to support, reinvigorate and future-proof a local economy that has been significantly affected by the economic impacts of the pandemic. Policies are responsive to changing circumstances, encouraging a range of economic growth, including business-supporting uses and setting out a policy framework to support a dedicated business hub capable of further enhancing the Manor Royal offer.
- 9.11 Temporary cultural and creative uses are encouraged in main employment areas to stimulate activity, with high quality communications supported to cater for modern business needs. Barriers to investment are addressed, principally through ensuring the main employment areas are protected for employment uses and are not undermined by non-employment uses that can create economic uncertainty. The planning process is further simplified in response to local circumstances removing the NPPF sequential test requirement where offices are proposed in main employment areas, and where hotel and visitor accommodation is proposed within the Gatwick Airport boundary. Dedicated policies relating to Gatwick Airport and the Town Centre are covered in the two subsequent chapters.
- 9.12 Through this economic strategy, the Local Plan will support sustainable economic growth in Crawley, building upon the borough's existing strengths and responding to the challenges it faces. This will ensure that the leading economic role of the borough continues to go from strength to strength.

## Local Plan Policies

### Economic Growth

- 9.13 To inform the level of employment growth that is forecast to occur over the period to 2040, a 2020 Economic Growth Assessment (EGA) has been prepared for the Northern West Sussex Functional Economic Market Area, which in addition to Crawley borough, is made up of Horsham and Mid Sussex districts. The EGA provides detailed analysis of Crawley's economy, outlining forecast job growth, and corresponding floorspace and land supply needs for the Plan period. This work has been further updated through Crawley focused EGA updates (September 2020 and January 2023) which factor in additional sensitivity testing and consider economic impacts arising from the Covid-19 pandemic and Crawley's economic outlook moving forward.

- 9.14 The 2023 EGA Supplementary Update for Crawley establishes a range of economic growth forecasts for Crawley in line with Planning Practice Guidance. Of these forecasts, the Local Plan employment land requirement is identified based upon Experian Q4 2022 Baseline Job Growth projections, this representing the most appropriate basis for considering future employment land requirements from a labour demand perspective. This forecast identifies need for a minimum 113,390sqm new floorspace (26.2 hectares) new employment land to accommodate business<sup>82</sup> needs in Crawley Borough to 2040. This is significantly within the industrial sectors<sup>83</sup> where, taking account of forecast declines in the Light & General Industrial sectors, floorspace need of at least 91,620sqm (22.9ha) is identified. Office and Research & Development floorspace need of at least 21,770sqm (3.3ha) is also identified.
- 9.15 Crawley's Employment Land Trajectory (Base Date 31 March 2023) identifies an available employment ~~land~~ supply pipeline of ~~71,325~~ **49,903**sqm (~~14.49~~ **10.29**ha), which comprises 21,020sqm (5.32ha) office and research & design and ~~50,305~~ **28,883**sqm (~~9.17~~ **4.97**ha) **industrial and storage &** distribution land. The existing available office land supply pipeline meets identified quantitative office needs, although there remains a broader qualitative office need. In addition to new office land coming forward in Crawley, the Horley Strategic Business Park site allocation in Reigate and Banstead Borough will add to the sub-regional office offer. Therefore, Crawley's employment land requirements are substantially of an industrial nature, principally in relation to B8 storage & distribution use. Subtracting the available industrial land supply pipeline, there remains an outstanding need for at least ~~41,315~~ **62,737**sqm (~~13.73~~ **17.93**ha) new land for B8 uses.
- 9.16 This places a significant requirement on the Local Plan to ensure that suitable and appropriate employment land is available to meet business needs. In the first instance, it is vital that existing business land supply is not undermined. Therefore, the Local Plan protects Crawley's designated Main Employment Areas for employment use, maximising opportunities to support economic growth at these locations through the intensification of existing sites and efficient utilisation of land for employment uses. Manor Royal will remain a focus for business-led economic growth, for office, industrial and storage & distribution-led uses, supported by other employment uses where these support its core mixed business function. Other designated Main Employment Areas will continue to represent a focus for sustainable economic growth, including for business uses, but with greater flexibility for other appropriate forms of economic development. To supplement the employment land supply position and deliver new floorspace at Manor Royal, small extensions to Manor Royal, outside of the safeguarded land, will be supported where this would contribute positively to business-led economic growth.
- 9.17 However, these measures alone are not sufficient to address Crawley's outstanding requirement for new B8 storage & distribution-led employment land. Crawley has seen sustained market demand for new warehouse accommodation capable of meeting the growing need for storage & distribution operations, and to ensure that identified employment needs can be met in full, a Strategic Employment Location is allocated at land east of Balcombe Road and south of the M23 spur, referred to as Gatwick Green. This is the only location in Crawley that is capable of providing the required quantum of industrial land and floorspace without prejudicing the possible future delivery of

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<sup>82</sup> Business is defined as office, research & development, light industry, general industrial, or storage & distribution uses.

<sup>83</sup> the term 'industrial space' is used to refer to both manufacturing (E(g)(iii)/B2) and warehouse and distribution (B8) uses.



southern runway on the safeguarded land. Requirements for the allocated site at Gatwick Green are set out in further detail under Policy EC4.

- 9.18 Taken as a whole, the Local Plan approach, in protecting and maximising the use of existing main employment areas for economic development, and identifying new land to meet Crawley's significant business needs, represents a positive and pro-active strategy to secure the sustainable economic growth required to support the economic role of Crawley and its wider sub-region.

### Strategic Policy EC1: Sustainable Economic Growth

Crawley's role as the key economic driver for the 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 ~~41,315~~ **62,737**sqm (~~13.73~~ **17.93** hectares) new B8 industrial, principally storage & distribution land over the period to 2040.

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

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

### Reasoned Justification

- 9.19 *Policy EC1 recognises the key sub-regional employment function that Crawley provides within the Gatwick Diamond and Coast to Capital LEP areas. It encourages sustainable economic growth by supporting the retention and intensification of the existing main employment areas for employment uses, and through the identification of new employment land to meet future economic needs. The Economic Growth Assessment plays a key role in understanding qualitative and quantitative economic growth needs within Crawley and the Northern West Sussex Functional Economic Market Area. The work recognises that Crawley is well placed to adapt to the implications of Brexit, and has responded well to the economic challenges posed by the Covid-19 pandemic. With the Crawley economy forecasted to consolidate, recover and grow over the Plan period, identification of new business land and floorspace is required if the borough, and more broadly the sub-regional economy, is to continue to thrive.*
- 9.20 *The EGA focuses on future job creation, floorspace and land take requirements within the business sectors of office, research and development, light industry (these falling within Class E Commercial, Business and Service), general industrial (Class B2) and storage or distribution (Class B8). Other employment uses outside of these sectors vary significantly in terms of range, employment density and operational requirements, and are more challenging to plan for in terms of floorspace and land take. Wider economic*

growth, outside of the business sectors listed above, is captured through the Crawley Retail, Leisure and Town Centre Neighbourhood Needs Assessment. Therefore, with Manor Royal identified as the focus for mixed business-led development, and Gatwick Green allocated for industrial and distribution-led growth, flexibility is afforded within the other Main Employment Areas in Crawley for business and other forms of economic growth.

- 9.21 *Planning Practice Guidance requires plan-making authorities to develop an idea of future economic needs based on a range of data, forecasts of quantitative and qualitative need, and having regard to market trends. The 2020 Northern West Sussex Economic Growth Assessment undertakes a comprehensive assessment of employment land requirements in the Functional Economic Market Area, with a 2023 EGA Supplementary Update for Crawley revisiting these earlier forecasts to identify business focused employment land requirements for Crawley to 2040. Employment land requirements have been considered having regard to economic forecasts from Experian and Oxford Economics (Q4 2022), past trends in business floorspace completions and forecasts of future labour supply based on population growth linked to housing need through the standard method. These produce a broad set of business land requirements which range from 21.4ha to 69ha. The different employment forecasts are explained in more detail in the Economic Growth Topic Paper.*
- 9.22 *The Local Plan approach is to plan for sustainable economic growth based on the 2022 Experian Baseline Growth forecast of a minimum 113,390sqm (26.2ha) business land over the period to 2040. This is considered to represent the most sustainable and appropriate basis on which to plan for economic growth in Crawley. It is based on up-to-date economic forecasts, which expect the Crawley economy to have recovered from the pandemic, and assumes for steady job growth to 2040. This broadly aligns with historic employment trends (2009-2021) recorded by ONS Business Register and Employment Survey (BRES) across Crawley's key sectors, and projected growth of 136,510sqm (32ha) based on Past Take-Up. Having regard to Labour Supply based on housing growth, the Local Plan's (supply-led) 314dpa figure would generate an employment floorspace need of 113,351sqm (26.1ha), which again aligns with Experian's employment growth provisions. A higher Labour Supply figure, assuming for 544dpa has also been considered – this could generate employment floorspace needs of 299,362sqm (69ha). This higher labour supply figure factors in the possibility of increased housing delivery through urban extensions coming forward both west and east of Crawley. ~~It is anticipated that although some employment needs arising from the proposed West of Ifield development would need to be met in Crawley, the development will itself provide around 2ha employment land, and remaining employment need arising from the development may be accommodated elsewhere within neighbouring districts.~~*
- 9.23 *Taking account of the available employment land supply pipeline, as explained in paragraph 9.15 above, Crawley is meeting its identified quantitative office land requirement, notwithstanding a wider qualitative demand in the sub-region for higher-specification Grade A offices. The outstanding business land requirement is for industrial land, substantially for B8 storage & distribution uses, where there is need for a minimum **41,31562,737sqm (13.7317.93ha)**. This is summarised below.*

	<b>Business Floorspace Need (Sqm) Experian 2022</b>	<b>Business Land Requirement (Ha) Experian 2022</b>
Office/R&D Requirement	21,770	3.3
Office/R&D Supply Pipeline	21,020	5.32
<b>Surplus/Shortfall</b>	<b>-750</b>	<b>+2.02</b>
Industrial Requirement	91,620	22.9
Industrial Land Supply Pipeline	<del>28,883</del> 50,305	<del>4.97</del> 9.17
<b>Surplus/Shortfall</b>	<del>-62,737</del> -41,315	<del>-17.93</del> -13.73

- 9.24 To address the significant need for business land in Crawley, Policy EC1 firstly protects Manor Royal as the key destination for mixed business development, and safeguards all Main Employment Areas to protect their economic function. To maximise Crawley’s limited employment land supply, Policy EC1 supports the redevelopment and intensification of under-utilised sites in Main Employment Areas to support their efficient use for economic growth.
- 9.25 In response to demand for additional business land, carefully planned minor extensions abutting the Manor Royal boundary may be appropriate. Should proposals come forward for these areas, regard must be had to the countryside setting of the site, its surrounds and context, given its location within the Upper Mole Rural Fringe (Policy CL8). Crucially, development in these areas should not prejudice the potential future delivery of a southern runway to the south of Gatwick Airport within the safeguarded land. Should any extensions be considered appropriate, development will need to demonstrate how it delivers additional business floorspace in line with Policy EC3.
- 9.26 However, this approach alone will not be sufficient to meet the outstanding need for additional storage & distribution land. Recent years have seen ongoing market demand for B8 storage & distribution land, often of a scale that Crawley has struggled to accommodate due to its limited land supply pipeline. Market demand has increasingly been accommodated through redevelopment of office and industrial land and buildings at Manor Royal. Although this investment is much welcomed, there is risk that the defining mixed-use function of Manor Royal may become eroded as the demand for warehouse space increases. The significant market need for logistics floorspace is particularly attributable to Crawley’s location close to Gatwick Airport and the strategic transport network, at the heart of the Gatwick Diamond. Whilst there are strategic employment locations being planned for across the Northern West Sussex FEMA, these are principally focused on other business sectors including offices and research & development, with no plans in place for a dedicated B8 storage & distribution destination. The NPPF places significant weight on supporting economic growth and productivity, including through the identification of strategic sites, to enable inward investment. Particular focus is given to recognising the specific locational requirements of sectors, including storage & distribution operations in accessible locations.
- 9.27 Therefore, land at Gatwick Green is allocated for the delivery of a high-quality industrial-led Strategic Employment Location. The Strategic Employment Location will be expected to meet, as a minimum, Crawley’s outstanding industrial land requirement of ~~13.73~~ 17.93ha, and must be planned in a manner that is complementary to the established role of Manor Royal as a strong and competitive mixed business district and also the office-focused Horley Strategic Business Park allocation in Reigate & Banstead Borough.

## Main Employment Areas

- 9.28 Crawley's Main Employment Areas, each of which has an established character and function, represent a focus for sustainable economic growth. Given the significant employment land requirement and limited available land supply pipeline, Policy EC2 seeks to protect and improve the existing economic areas, maximising the potential to make efficient use of existing employment sites.
- 9.29 Manor Royal, Gatwick Airport and Crawley Town Centre are the largest of the borough's Main Employment Areas. Given the key role performed by each in driving the Crawley and Gatwick Diamond economies, location-specific policies for each are set out through Local Plan Policies EC3, GAT1-4 and TC1-5 respectively. In addition to these designated spatial policies, the requirements of Policy EC2 also apply to the designated Main Employment Areas of Manor Royal, Gatwick Airport and Crawley Town Centre. Given the need to balance use of the available land supply for economic and housing needs, the loss of employment land and floorspace criteria of Policy EC2 will not apply where Town Centre named allocations and Key Opportunity sites are brought forward for residential under Local Plan Policy H2.
- 9.30 Crawley's remaining Main Employment Areas as identified within Policy EC2 are: Three Bridges Corridor (including Denvale Trade Park, Spindle Way, Stephenson Way and Hazelwick Avenue), Maidenbower Business Park, Tilgate Forest Business Centre, Broadfield Business Park, Lowfield Heath, Broadfield Stadium and K2 Crawley, and The Hawth Theatre. The role and function of these Main Employment Areas vary, but in all cases they are protected for economic development use including through the intensification of sites for employment uses.

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

Crawley's Main Employment Areas make a significant contribution to the economy of the town and the wider area, and are a focus for sustainable economic growth.

Whilst identified as Main Employment Areas, Manor Royal, Gatwick Green, Gatwick Airport and Crawley Town Centre perform a specific employment role which is recognised in individual location-specific Policies EC3, EC4, TC1-TC5, and GAT4.

The **other** Main Employment Areas are:

- ~~Manor Royal;~~
- ~~Crawley Town Centre;~~
- ~~Gatwick Airport;~~
- ~~Gatwick Green (allocation, Policy EC4 refers)~~
- Three Bridges Corridor (including Denvale Trade Park, Spindle Way, Stephenson Way and Hazelwick Avenue);
- Maidenbower Business Park;
- Tilgate Forest Business Centre;
- Broadfield Business Park;
- Lowfield Heath;
- Broadfield Stadium and K2 Crawley;
- The Hawth.

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

Development that would involve a net loss of employment land or floorspace in any Main Employment Area, **including Manor Royal, Gatwick Green, Gatwick Airport and Crawley Town Centre**, will only be permitted where it is demonstrated that:

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

### **Reasoned Justification**

- 9.31 *The approach set out in Policy EC2 supports the established role of the Main Employment Areas as destinations for sustainable economic growth. Each performs a different but vital role in helping to meet economic needs in Crawley. The largest Main Employment Areas are Manor Royal, the leading business destination in the Gatwick Diamond; Crawley Town Centre, a focus for Main Town Centre uses and a sub-regionally significant centre; and Gatwick Airport, a key location for airport-related employment. The Gatwick Green site is allocated through Local Plan Policy EC4 and will itself be a designated Main Employment Area. The borough's other Main Employment Areas perform an important complementary role, supporting a range of employment uses that includes small businesses, offices, and high quality leisure and recreation facilities. The Main Employment Areas, individually and collectively, play a vital role in supporting sustainable economic growth in Crawley and that of the wider Gatwick Diamond. Policy EC2 ensures that the economic role and function of each Main Employment Area is protected and strengthened to support economic growth, ensuring that the economic function of these locations is not undermined and potentially compromised by inappropriate non-employment development.*
- 9.32 *Crawley Town Centre is designated as a Main Employment Area, though recognising its sustainable location and the positive contribution that residential uses can make to town centres, it is also identified under Policy H2 as a Broad Location for Housing. Given these dual roles, there is need to ensure that an appropriate balance is achieved between the employment and residential roles of the Town Centre, thus supporting its overall vitality and viability. Therefore, where applications would result in a loss of employment land or floorspace within the town centre boundary, the EC2 loss of employment criteria should be satisfied. Where specific Town Centre sites have been allocated under Policy H2, Policy TC3, or are named within the Local Plan Housing Trajectory as part of the Town Centre Broad Location, it will not be necessary to apply the EC2 loss of employment test.*
- 9.33 *Article 4 Directions are in place at Main Employment Areas at Lowfield Heath, Maidenbower Business Park, Manor Royal, Three Bridges Corridor, and Tilgate Forest Business Centre. The Directions remove permitted development rights granted by Schedule 2, Part 3, Class MA (Class E commercial, business and service use to Class C3 residential) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) in order to protect the economic function of these areas.*

## Crawley's Main Employment Areas

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

9.34 *Covering an area of 240 hectares, Manor Royal is the Gatwick Diamond's leading business district, accommodating over 600 businesses and over 30,000 jobs. Its strategic location between Brighton and London, proximity to Gatwick Airport, and excellent transport links, places Manor Royal at the heart of the Gatwick Diamond. Through the Manor Royal Business Improvement District (Manor Royal BID), ongoing projects will help to build upon the Manor Royal brand and deliver the improvements sought by business. The Local Plan has a key role to play in supporting the mixed business-led economic role of Manor Royal, setting in place a framework to retain its business-led focus whilst supporting wider improvements that will enable Manor Royal to build on its established strength. The specific policy approach for Manor Royal is set out at Policy EC3.*

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

9.35 *Crawley Town Centre is the main shopping and leisure destination in Crawley borough, drawing visitors from people living in Crawley and from a wider retail catchment. It contains a good range of shops, restaurants, cafes and bars, as well as recreation uses at Crawley Leisure Park, all of which contribute to the overall attractiveness of the town centre as an enjoyable place to visit. As a centrally located and highly sustainable location, around 13,500 people work in the Town Centre. This commercial offer must be carefully balanced with the requirements of a growing residential population. The recently established Town Centre Business Improvement District, alongside an ambitious regeneration programme, is further enhancing its vitality as a place. Specific policies for Crawley Town Centre are set out at Policies TC1 to TC5.*

### *Gatwick Airport: An international airport*

9.36 *During 2018/19, Gatwick Airport served 46.4 million passengers, a figure that the Gatwick Airport Master Plan forecast to grow to 61 million passengers per annum (mppa) by 2032 within the current two terminal, single runway operation, and potentially to 70mppa by 2032 should the government allow the operational use of its existing standby runway. As a hub for employees and visitors, and a key economic driver through direct and indirect employment, Gatwick Airport is central to Crawley's economy and that of the Functional Economic Market Area. As of 2019, the airport provided 24,000 on-airport jobs, and although this number reduced during the pandemic, the airport has continued with its post-Covid recovery. Specific policies for Gatwick Airport are set out through Policies GAT1 to GAT4.*

### *Three Bridges Employment Corridor*

9.37 *The Three Bridges Employment Corridor is situated in a highly sustainable location between Three Bridges railway station and Crawley Town Centre. It includes Denvale Trade Park, Spindle Way, Stephenson Way and Hazelwick Avenue. These areas support a diverse range of economic uses including office, light industrial, storage & distribution, trade counters, car showroom and automotive uses.*

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

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

### *Lowfield Heath*

9.39 *A traditional industrial estate, accommodating a range of office, industrial and storage & distribution uses, in addition to other employment uses, the area is located adjacent to the southern perimeter of Gatwick Airport. There is a range of building stock, with regard*

to size and use, and the site provides a complementary employment role close to Manor Royal. The Main Employment Area is situated within the Gatwick Airport Safeguarded land, placing limits on the scope for development, and applicants should refer to Local Plan Policy GAT2.

### Broadfield Stadium and K2 Crawley

9.40 These Main Employment Areas make an important contribution to the leisure and recreation economic sectors, accommodating Crawley Town Football Club and K2 Crawley. These locations, provide an important commercial leisure offer within Crawley, also serving a wider catchment.

### The Hawth Theatre

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

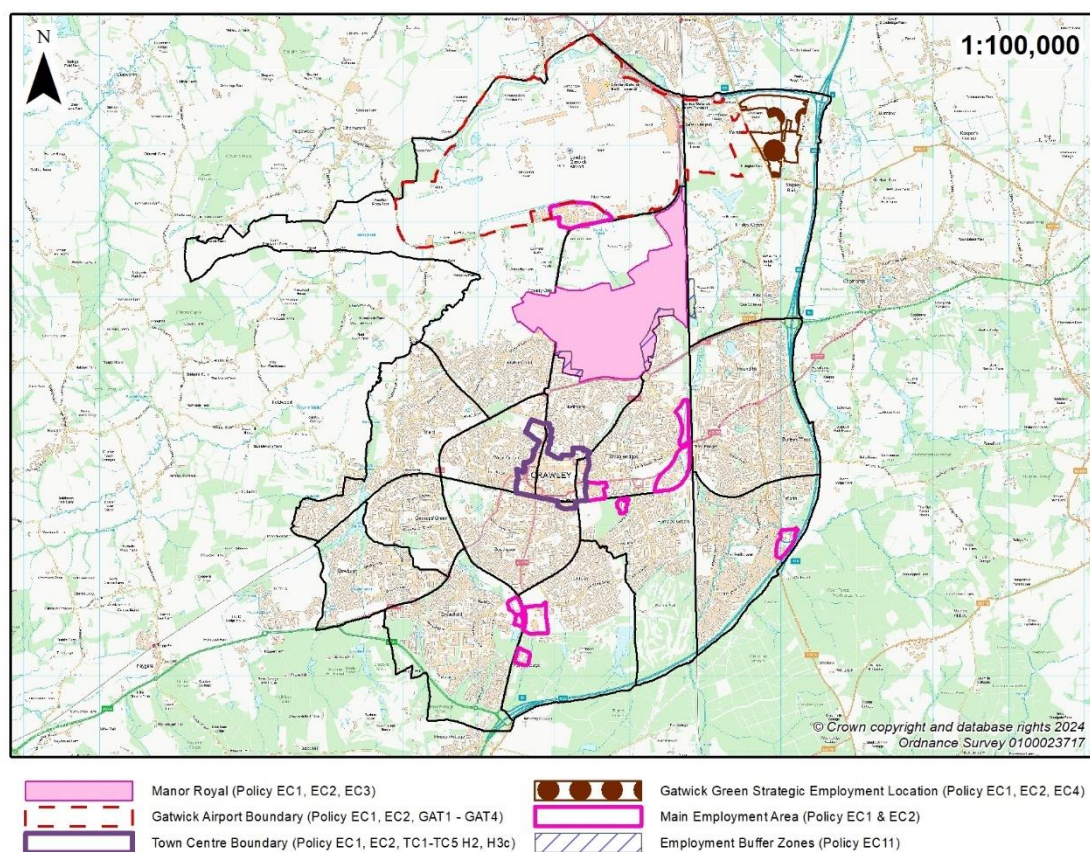


Figure 16: Crawley's Main Employment Areas

### Manor Royal

9.42 Manor Royal is the principal business location in the Gatwick Diamond, leading the way as a destination for office, industrial and storage & distribution focused economic growth. At approximately 240 hectares, with over 600 businesses and providing around 30,000 jobs, Manor Royal is critical to the economic function of Crawley and that of the wider sub region. It is one of the largest mixed use business areas in the South East, with excellent transport links providing access to a wide catchment of suppliers, customers and staff. Situated just 30 minutes from both Brighton and London, it is a focal location for employment at the heart of the Gatwick Diamond and Coast-to-

Capital Local Enterprise Partnership areas. The presence of the Manor Royal BID adds further strength to the business district, developing the Manor Royal brand, delivering enhancements that support the principal business function of the area, and lending a collective voice to its members.

- 9.43 The ambition for Manor Royal relies on the systematic enhancement of its existing strengths of scale, diversity, connectivity and location. Key to this approach is a priority focus on business uses within Manor Royal, ensuring that its core business function is maintained and enhanced to provide a high-quality environment that supports the operation and growth of existing businesses and attracts new investment. There is a recognised need for supporting facilities and staff amenities that are of an appropriate scale and function to support the day-to-day needs of Manor Royal businesses and employees. These may potentially be accommodated in the form of a dedicated business hub capable of achieving genuine step-change at Manor Royal, but may also come forward at a more discreet scale on an individual basis. Therefore, the Local Plan applies appropriate flexibility for non-business development where it is demonstrated that this will help address existing deficiencies and would support Manor Royal’s core business function. More broadly, through achieving good design and landscaping for all development, aesthetic improvements should be made to the Manor Royal environment, further supporting its long-term desirability as a successful business location.
- 9.44 Through positive planning that facilitates business-led development and brings about overall improvements to the quality of its environment, the council, in partnership with the Manor Royal BID, businesses, and other stakeholders will support Manor Royal through:
- providing an environment that supports and encourages mixed business growth;
  - building on the unique business and physical attributes afforded by its location and history; and
  - enabling an attractive and desirable working environment.

### **Policy EC3: Manor Royal**

Manor Royal is the principal business location for Crawley, and is instrumental to the economic success of the Gatwick Diamond. Its core business function is a key strength that should be retained and enhanced.

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

Development outside of the sectors identified above will be permitted where it can be demonstrated that it is of a scale and function that supports, and does not undermine, the established business role and function of Manor Royal.

Development of a dedicated business hub capable of addressing the need for supporting business facilities and staff amenities will be supported. This should be sustainably located and will be expected to provide genuine step-change to complement and enhance the business function of Manor Royal.

All development should contribute positively to the overall setting and environment of Manor Royal through high quality design and landscaping in accordance with the Manor Royal Design Guide Supplementary Planning Document.



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

### **Reasoned Justification**

- 9.45 *Manor Royal continues to represent the dominant business cluster within the Gatwick Diamond. It is home to the largest critical mass of businesses in Crawley, and its total 866,000sqm commercial floorspace, includes 227,000sqm office floorspace, 187,000sqm industrial, and 379,000sqm warehousing<sup>84</sup>. Despite declining land availability, new stock continues to be delivered through the reuse and intensification of land, underlining Manor Royal’s economic vibrancy and attractiveness to a diverse mix of occupiers.*
- 9.46 *The limited available land supply at Manor Royal presents an obstacle as existing businesses seek to grow and also for new businesses seeking to locate in the business district. Therefore, the Local Plan takes a positive approach to support Manor Royal and reinforce its role as the leading business destination for Crawley and the Gatwick Diamond. Key to its approach is support for business-led development to ensure that the core business function of Manor Royal is maintained and enhanced, whilst adding to the overall business land-supply pipeline through appropriate extensions as outlined through Policy EC1. Flexibility is provided for other employment and ancillary uses where these are of a scale and function that would support Manor Royal’s business function.*
- 9.47 *There remains a recognised need to improve access to complementary business facilities and staff amenities within the business district, which are needed to support the day-to-day needs of Manor Royal businesses and employees. This includes facilities for meeting room hire and conferencing; childcare; small-scale convenience retail; café and restaurant uses; leisure and health; open space, and also facilities to support sustainable access, for example, electric vehicle charge points or cycle parking. Such facilities will be supported where it is demonstrated that development is of a scale and function that supports, and does not undermine, the core business role of Manor Royal.*
- 9.48 *The Manor Royal Economic Impact Study (2017) advises that, unlike many of its competitors, Manor Royal lacks a dedicated hub that is designed specifically with business users in mind. A facility of this nature would provide an opportunity to cluster several of the required business support facilities and staff amenities in a centrally located business hub, helping reinforce the Manor Royal brand, and potentially achieving a genuine step-change to support the business district in responding effectively to existing and emerging competitors.*
- 9.49 *As Manor Royal was purpose-built as part of the original Crawley New Town, it is not planned out in the way that more modern business parks are today, and its physical and aesthetic environment has in places inevitably declined over time. Development in Manor Royal should be of a high design quality and delivers suitable landscaping to support improvements to the overall environmental quality of the business district. The Manor Royal Design Guide Supplementary Planning Document will play a key role in guiding the delivery of qualitative improvements to the business district’s environment through implementation of high quality design standards, particularly at key gateway sites and frontages.*

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<sup>84</sup> Manor Royal Economic Impact Study (2017) Lichfields

- 9.50 *To support ongoing improvements to the Manor Royal environment, a developer contribution will be sought towards public realm improvements. Subject to the quantum of development proposed, this may take the form of a financial contribution towards specified projects identified by the council in liaison with Manor Royal BID, or where the financial contribution sought would be £500 or less, through appropriate on-site provision to be negotiated with the council. Specific projects will be identified by the council in liaison with the Manor Royal BID. Further detail is provided in the Local Plan Planning Obligations Annex.*
- 9.51 *Crawley Goods Yard and railhead is located within Manor Royal and provides an important function in the processing and bulk transportation of minerals and aggregates. As required by the NPPF, the existing railhead and associated storage and handling facilities are safeguarded from other forms of development through Policy M10 of the West Sussex Joint Minerals Local Plan 2018 (Partial Review, March 2021). West Sussex County Council (WSSCC) should be consulted in relation to any planning proposals at, or within 250m of Crawley Goods Yard.*

### **Strategic Employment Location**

- 9.52 Land east of Balcombe Road and south of the M23 spur, known as Gatwick Green, is allocated for the development of a Strategic Employment Location that will contribute significantly to meeting Crawley’s substantial need for new industrial and warehouse land and floorspace. The site is strategically located in proximity to Gatwick Airport, Manor Royal Business District, and the allocated Horley Strategic Business Park site in Reigate & Banstead Borough. Gatwick Green offers significant opportunity to deliver the type and quantum of industrial-led business floorspace that is needed to maintain and enhance Crawley’s leading role as an economic driver of at the heart of the Coast to Capital LEP and Gatwick Diamond areas. It can be delivered without prejudicing the delivery of a new southern runway at Gatwick Airport, should that be supported by the Government.
- 9.53 As identified by Strategic Policy EC1, over the period to 2040 there is outstanding need for provision of at least ~~13.73~~**17.93**ha new storage & distribution-led industrial land in Crawley. The Gatwick Green Strategic Employment Location will be substantially led by the provision of industrial and storage & distribution floorspace, supported by ancillary uses that are of an appropriate scale and function. Through expanding the range and quantum of business floorspace within Crawley, Gatwick Green will support the growth of existing Crawley businesses and attract new investment to the borough, enabling market demand for industrial and warehouse space in Crawley, which has been frustrated by a constrained land supply position, to be accommodated within the borough. This offer will be complementary to the mixed business function of Manor Royal, and the office-led Horley Strategic Business Park.

#### **Strategic Policy EC4: Strategic Employment Location**

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

#### Requirements

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

#### Employment Uses

- a. Provide as a minimum ~~13.73~~**17.93**ha new industrial land, predominantly for B8 storage and distribution use, ~~demonstrating through appropriate evidence the justification for any further industrial floorspace beyond this amount.~~
- b. Justify any limited complementary ancillary uses such as office floorspace, small-scale convenience retail and small-scale leisure facilities that would support the principal industrial-led storage and distribution function.

#### *Movement and Accessibility*

- c. Demonstrate through a Transport Assessment that appropriate access can be provided to the site having regard to both employee and operational movements. This must demonstrate that there will be no severe residual impact on the local and strategic road network, taking into account the operation of Gatwick Airport as nationally significant infrastructure, the allocated Horley Strategic Business Park, and the impact of committed developments in the borough and surrounding areas.
- d. Demonstrate through a comprehensive Mobility Strategy how the development will **achieve the master plan-level vision for the development as regards movement, including through** ~~include~~ measures and improvements ~~to~~ that maximise sustainable access to the site, ~~focusing on how the development will~~ **and** optimise the usage of sustainable modes of transport as opposed to the private vehicle. **The Mobility Strategy will and detailing detail** infrastructure improvements that will be required to adequately mitigate the development impacts on the highways network, ~~detailing and set out~~ how these improvements will be delivered and operated. 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.
- 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.
- f. **Submit a Construction Management and Phasing Plan, to include measures that mitigate any adverse impacts on local and strategic road networks during the construction phase.**
- g. ~~f~~ Provide improvements to public transport facilities, including existing bus infrastructure, and measures to maximise the accessibility of routes/services to future occupiers in and around the site.
- h. ~~g~~ Upgrade and extend pedestrian/cycle routes to the site from residential areas in Crawley and Horley and from Gatwick Airport station.
- i. ~~h~~ Provide appropriate levels of on-site parking solely for the uses on the site and ensure measures are in place to ensure no airport-related parking occurs.
- j. ~~i~~ Submit air quality modelling alongside the Transport Assessment, to include consideration of cumulative impacts.

#### *Sustainable Design and Construction*

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

- n. ~~n~~ Submit an Agricultural Land Classification Statement evidencing that a robust assessment of agricultural land quality has been undertaken for the allocation site and demonstrating how the requirements of Policy EC13 are satisfied.

#### *Digital Technology*

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

#### *Character and Design*

- p. ~~e~~ Be designed and laid out to achieve an appropriate transition to, and relationship with, neighbouring residential and countryside areas, including through appropriate height, massing and siting of buildings and suitable consideration of shared boundaries to include measures to reinforce existing tree and hedgerow screening. Particular regard should be had to the location of the site in the North East Crawley Rural Fringe landscape character area.
- q. ~~p~~ Ensure the height and design of buildings, lighting and other design aspects are consistent with the operational standards of Gatwick Airport ~~with and to~~ respect ~~to~~ aerodrome safeguarding requirements ([Policy DD5 refers](#)).
- r. ~~q~~ Include an appropriate landscape buffer, and public open space, to reinforce the distinctive identity of Gatwick Green Strategic Employment Location, and its separation from Gatwick Airport, Horley, and the wider countryside setting of the site.
- s. ~~r~~ Provide buildings of an exemplar standard of design to reflect the Strategic Employment Location concept including sufficient flexibility to provide adaptability to cater for a range of, expanding and established businesses and major occupiers and to be complemented by high quality public realm.
- t. ~~s~~ Protect and enhance woodland, existing trees and hedgerows where possible and enhance the green/blue infrastructure on site, including the Gatwick Wood Biodiversity Opportunity Area.
- u. ~~t~~ Ensure the design of buildings provides appropriate interior environment for users, having regard to the impacts of noise from existing and future sources, particularly air traffic and the M23. Mitigate noise intrusion from activities on the site to adjacent residential and open areas.
- v. ~~u~~ Provide measures to minimise the impact of lighting upon neighbouring residential and adjoining countryside areas.
- w. ~~v~~ Ensure development proposals conserve the setting of nearby Listed Buildings and Locally Listed Buildings. The retention of important hedgerows will be encouraged as will retention of a buffer to the green corridor along Balcombe Road to retain the historic landscape character.

#### *Impact Assessment*

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

#### *Delivery*

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

- Requirement for ongoing economic impacts testing.

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

The development of the site will be in accordance with an agreed master plan, [incorporating a vision-led approach as required by Department for Transport Circular 1/2022](#), produced by the site promoter in consultation with the council to ensure comprehensive development in line with the above requirements. The master plan will be submitted at the outline planning application stage to assist the consideration of subsequent planning application(s) and must include phasing, programming of infrastructure and details on quantum of development and appropriate uses.

### **Reasoned Justification**

- 9.54 *Local Plan Policy EC1 identifies overall need for a minimum 26.2ha business land over the Plan period, of which the majority (22.9ha) is for industrial land, predominantly B8 storage & distribution warehousing. With an existing industrial land supply pipeline of ~~9.17~~ 4.97ha, there is outstanding need for at least ~~13.73~~ 17.93ha new industrial land in the borough over the period to 2040.*
- 9.55 *The ‘call for sites’ undertaken for the Local Plan resulted in land totalling just under 160ha being promoted to the council for business-led employment use. These sites, set out within the Employment Land Availability Assessment, are significantly located on land identified in the Gatwick Airport Master Plan for safeguarding.*
- 9.56 *As explained in paragraph 10.17 and set out in Policy GAT2, land at Gatwick Airport is required to be safeguarded for a potential future southern runway. Most of the sites promoted to the council for employment are located south of the airport, on safeguarded land that would potentially be required to accommodate the physical land-take needed for a southern runway and road diversions. Employment development at these sites would prejudice the future delivery of a southern runway, were this to be required by the government, and cannot therefore be explored further for allocation, as to do so would be contrary to national policy.*
- 9.57 *Land to the east of Balcombe Road and south of the M23 spur, referred to as Gatwick Green, has also been promoted to the council for employment use through the ‘call for sites’. The 44ha site is located east of Gatwick Airport, also on land identified by the Gatwick Airport Master Plan for safeguarding. However, unlike the situation for the other employment sites that have been promoted, land at Gatwick Green does not form part of the land take that would be required to accommodate a southern runway and the diversion of the A23, and is shown in the Gatwick Airport Master Plan as being utilised for a large area of surface car parking. The council does not consider parking to represent an efficient use of the site, particularly given the significant employment needs of Crawley borough, and is of the view that the airport could accommodate parking more efficiently through decked parking and other efficiency measures, should it be demonstrated that additional on-airport parking is required having regard to the airport’s surface access obligations stated in the S106 legal agreement. Therefore, the Local Plan retains safeguarding but amends its boundary to exclude land to the east of Balcombe Road and south of the M23 spur, which represents the only site within Crawley that can be allocated for strategic employment growth without prejudicing the possible delivery of a southern runway at Gatwick Airport.*

- 9.58 Land at east of Balcombe Road and south of the M23 spur, known as Gatwick Green, is allocated for an industrial-led Strategic Employment Location that will provide a minimum of ~~13.73~~ **17.93**ha industrial land, predominantly within the B8 use class. The site identified on the Local Plan Map is larger because, based on past trends and market demands, a greater quantum of industrial floorspace may be required. This could be supported by complementary uses where justified by evidence, including ancillary uses such as a limited provision of offices and supporting amenity uses that will cater for the needs of employees. Also, there is a need for the strategic development to provide comprehensive supporting infrastructure, and an appropriate landscaping buffer to protect the amenity of neighbouring properties. Anticipated to be built out ~~over a seven to ten year period, completed by 2040~~ **by 2035**, the Gatwick Green allocation will meet Crawley's economic needs ~~in the latter part of~~ **during** the Plan period. A Masterplan will be required for the whole of the allocated land, to show how the areas to be built upon in the current, and potentially future, Plan periods, will be landscaped and will fit within the setting of the wider site. **This will include a vision-led approach to development, prepared in accordance with Department for Transport Circular 01/2022: 'Strategic road network and the delivery of sustainable development.'**
- 9.59 Crawley's Economic Recovery Plan (2021) sets out that economic diversification is important for the economy's resilience. Identification of new employment land to address the identified provision gap in the industrial sector, particularly in storage and distribution, will support the shift towards a more diverse and multi-sectoral economy in Crawley, adding to the type and range of employment sites within the borough. This will help to meet the growth and locational requirements of businesses that have outgrown existing sites, and attract new investment that has not previously been able to locate in the borough due to the scale of their operations and lack of appropriate sites. The allocation of Gatwick Green for industrial-led employment will help to reinvigorate Crawley's economy, supporting existing businesses, attracting new and diverse growth, and reinforcing the key economic role of Crawley within the Gatwick Diamond.
- 9.60 In doing so, it will be vital to ensure that employment growth at Gatwick Green is delivered in a manner that is complementary to the mixed-business offer of Manor Royal, the vitality and viability of Crawley Town Centre, the office-led Horley Strategic Business Park allocation in Reigate and Banstead borough, and other planned strategic employment development within the functional economic market area. The applicant will be required to demonstrate in detail how the required complementarity will be achieved to ensure that Gatwick Green supports economic growth in a manner that does not undermine existing or planned development.
- 9.61 Gatwick Green is sustainably located close to Gatwick Airport, though it does represent a countryside location, and it is vital that development is carefully master planned and designed to ensure that the character of its rural setting within the North East Crawley Rural Fringe is not undermined. Issues that will merit particular consideration will include the relationship with the designated Gatwick Wood Biodiversity Opportunity Area. The amenity of existing properties that border the site will need to be protected, and an appropriate and carefully considered landscape buffer will be required to retain a sense of separation between the site and adjoining countryside and settlements. Regard should be had to presence of woodland, trees and hedgerows, which should be protected and where possible enhanced.
- 9.62 The allocated Strategic Employment Location is situated within the Burstow Stream catchment, which is identified as being at a high risk of cumulative flood impacts, whereby multiple development sites, unless carefully planned could result in increased flood risk to third parties. To minimise cross-boundary issues, a detailed local area

Flood Risk Assessment and Drainage Study will be required to consider further how the cumulative effects of potential peak rates and volumes of water from development would impact on peak flows, duration of flooding and timing of flood peaks on receiving watercourses. This should detail how SuDS will be incorporated into the development, providing details of adoption, ongoing maintenance and management. This should also outline how the development will seek to provide wider betterment by demonstrating what measures can be put in place to contribute to a reduction in flood risk downstream.

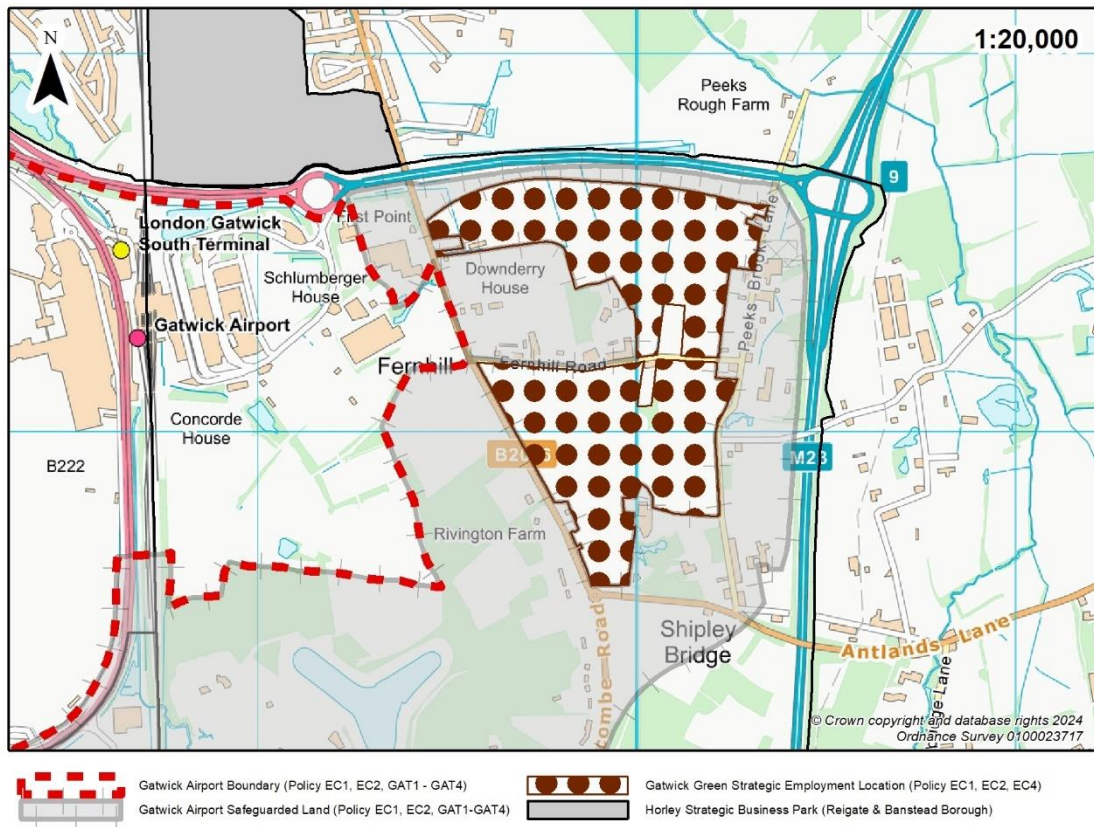


Figure 17: Strategic Employment Location

9.63 The Strategic Employment Location is surrounded by strategic transport links, but it has no immediate access to the strategic road network or Gatwick Airport railway station. A Strategic Employment Location of the scale proposed at Gatwick Green will generate surface access demands that will impact upon the existing highways network. The focus will be to maximise opportunities to access the site by sustainable transport modes, particularly for employees. However, given the scale and industrial nature of the proposed development, development must cater for its operational requirements, particularly HGV movements, demonstrating through the Transport Assessment and Mobility Strategy how this will be achieved without an adverse impact upon the highways network and residential amenity. It is vital that surface access demands arising from the development are appropriately catered for through the delivery of new infrastructure and/or improvements to existing infrastructure as part of the development. An HGV ban for traffic headed into Gatwick Green from the north on Balcombe Road is proposed at the access junctions into the site to prevent this traffic travelling through the built-up area in Horley. 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. Given the requirement to provide the physical infrastructure to support

*the Strategic Employment Location as part of the development itself, a S106 sustainable transport contribution will not be sought.*

- 9.64 *It should be noted that the requirements set out under Policy EC4 do not represent an exhaustive list, and development at Gatwick Green will be required to have regard to the Local Plan as a whole.*

## **Employment and Skills Development**

- 9.65 Crawley is a place that is changing and growing, as more people choose to come to the borough to live and work. It is well established as a key employment destination, and is home to around 4,000 active businesses which generate over ~~100,000~~ 85,000 jobs. Despite its strong economic performance, there is a recognised disparity between the on average lower level of qualifications and income achieved by people that live in Crawley and those of the in-commuting workforce which are on average higher. This is reflected in Crawley's position close to the bottom of social mobility rankings published in the 2016 State of Nation report, where Crawley ranks 304<sup>th</sup> out of 324 local authorities.
- 9.66 Addressing the skills gap is vital to enabling Crawley residents to access higher skilled employment, creating the right conditions for career opportunities for those living within the borough. It is important that Crawley offers the right skills profile to cater for the needs of current and future employers. Through the council's own research, it is estimated that £49 million GVA per annum is lost through skills shortages; working to address the longstanding skills gap will help Crawley in continuing to attract inward investment as a preferred location for business.
- 9.67 The original Crawley Employment and Skills Plan, launched in 2016, introduced flagship projects including the borough having achieved Construction Industry Training Board (CITB) Skills Academy status, introduction of the Developer and Partner Charter, and the creation of Employ Crawley. In supporting different routes to education and higher value jobs, it has helped empower some of Crawley's most disadvantaged residents and has promoted and enhanced the council's commitment to making Crawley a Living Wage zone. Through its successor, the Crawley Employment and Skills Programme 2019-2024, the council is continuing to support Crawley residents in accessing education and job opportunities within the borough.
- 9.68 However, more needs to be done. A challenge facing Crawley is the need to improve education, skills, employment and social mobility outcomes. Crawley's people, location and assets make it an attractive investment and regeneration area, and the opportunities and proceeds of growth, regeneration and housing can be used to raise aspirations and reduce inequality. It is appropriate that development contributes to improving social mobility in the borough, supporting access to training and learning and access to the job market for those residents who require support.

### **Policy EC5: Employment and Skills Development**

Major developments will be required to contribute to meeting objectives set out in the most up-to-date Crawley Employment and Skills Programme. This will be achieved through:

- i. Committing at the Planning Application stage to prepare and submit a site-specific Employment and Skills Plan, the content of which must be agreed by the council prior to the commencement of development. This will detail how the development, through its construction and (for commercial development where there is a known occupier) end user phases, will support initiatives identified in the Crawley



Employment and Skills Programme. This commitment will form part of the obligations on a planning permission and will be secured by way of a S106 legal agreement.

- ii. The making of a proportionate financial contribution towards employment and skills initiatives in Crawley.

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

### **Reasoned Justification**

- 9.69 *There is a recognised disparity between the skills levels obtained on average by Crawley residents, and those of the in-commuting workforce. Compared with the South East England (41.4%) average, and also those of neighbouring Horsham District (42.3%) and Mid Sussex District (46.3%), Crawley (33.2%) has a lower proportion of residents with higher-level qualifications (equivalent to NVQ4+). This is also shown in the proportion of Crawley residents (7.6%) who have no formal qualifications, which whilst comparing favourably to the South East England (10.5%) average, is significantly higher than corresponding figures for both Horsham District (3.8%) and Mid Sussex District (4.2%)<sup>85</sup>.*
- 9.70 *This means that Crawley residents are less likely to access higher paid jobs. Reflecting the skills profile, average weekly earnings for Crawley residents (£558.70) are significantly lower than those for residents living in Horsham (£649.80) and Mid Sussex (£645.40), and remain below the South East England (£614.50) average. The average wage for someone working in Crawley (£632.80) remains higher than the average wage (£558.70) for someone living in the borough, again demonstrating the practical issues arising from the skills gap in Crawley<sup>86</sup>.*
- 9.71 *Through the Employment and Skills Programme, identification and creation of apprenticeships, training and job opportunities for local residents remains a key objective. A key priority is helping local people and businesses benefit from the opportunities arising from development. This can be supported through the funding of skills, training and employment programmes and local employment and training obligations. Crawley Borough Council is committed to ensuring that growth is inclusive and sustainable for all. The aim is to support local residents, young and old, into employment and raise the skills of the workforce so that they can access the new jobs being created across the borough.*
- 9.72 *As outlined by the Economic Recovery Plan (2021), Crawley was among the areas most affected by the economic impacts Covid-19. Whilst the local economy continues to recover, there remains a need to provide the support and training to enable impacted residents to access new opportunities arising from economic diversification.*
- 9.73 *The NPPF is clear that planning policies should help create the conditions in which businesses can invest, adapt and expand, with significant weight placed on the need to support economic growth and productivity, taking account of local business needs. It goes on to set out that the approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. The Gatwick 360° Strategic Economic Plan<sup>87</sup> identifies pockets of lower skills, specifically referencing Crawley, as a barrier to growth, and establishes the need to create skills for the future as one of its eight economic priorities.*

<sup>85</sup> Source: ONS/Lichfields analysis, Northern West Sussex Economic Growth Assessment (2019)

<sup>86</sup> Source: ONS/Lichfields analysis, Northern West Sussex Economic Growth Assessment (2019)

<sup>87</sup> Strategic Economic Plan Gatwick 360° (2018) Coast to Capital Local Enterprise Partnership

- 9.74 Significant forecast job growth in Crawley presents an opportunity to maximise skills development and employment opportunities for local people through securing contributions from development. A better skilled local workforce can provide a pool of talent to both developers and end occupiers. This will also reduce the need to import skills, and in doing so reduce congestion and less sustainable travel to work journeys and reduce carbon emissions. Conversely, an inability to effectively improve local skills levels potentially inhibits economic growth, failing to address a recognised economic weakness for Crawley.
- 9.75 Therefore, Policy EC5 requires all major development, including residential and employment uses, to contribute to addressing the skills gap in Crawley. This will help to support the social mobility of Crawley residents and meet the requirements of business in providing local access to a more highly skilled local workforce. The approach supports appropriate social infrastructure through provision of employment and training initiatives on major development sites at demolition and construction stages, and for commercial sites where there is a known occupier, the end user phases. A site specific Employment and Skills Plan should be prepared and submitted by the applicant, in liaison with the council, to demonstrate how development will support initiatives identified in the Crawley Employment and Skills Programme. This will be secured through a S106 agreement on a planning permission.
- 9.76 A developer contribution will be sought for all major residential and employment applications. This **will normally be a proportionate financial contribution that** 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. **Where it can be clearly demonstrated that measures in lieu of the financial contribution would achieve greater benefits in delivering employment and skills initiatives to help Crawley residents access employment opportunities, this will in principle be supported, subject to negotiation and agreement with the council.** Contributions will be agreed by the council and developer and secured through a S106 legal agreement.
- 9.77 Further information on the preparation, content and outcomes required from part i, the Employment and Skills Plan, is set out in the Employment and Skills Provision Guidance Note<sup>88</sup>. The Planning Obligations Annex sets out detailed guidance on the requirements of Strategic Policy EC5, part ii. relating to the calculation and payment of a developer contribution towards employment and skills development, **or the achieving of the Policy EC5 objectives through other measures**. Both parts of Policy EC5 should be satisfied in accordance with the Planning Obligations Annex.

### High Quality Office Provision

- 9.78 Crawley is the Gatwick Diamond's largest office centre, with the market having increasingly gravitated to Crawley in order to benefit from its accessible location. Across the Northern West Sussex Functional Economic Market Area, the office market has been characterised by increasingly challenging conditions, with much reduced levels of take-up. This is in part a result of the available stock, which is largely composed of older Grade B offices that do not match the market demand for new Grade A stock, often bespoke rather than speculative, across a range of sizes. This has resulted in the Crawley office market being somewhat suppressed, with the limited available Grade A stock quickly taken up, with lower grade stock typically remaining vacant or being redeveloped for other uses. This is very much a qualitative issue for

<sup>88</sup> <https://investcrawley.co.uk/employment-and-skills/employments-and-skills-programme>  
[www.investcrawley.co.uk](http://www.investcrawley.co.uk)

Crawley's office stock, and there is a growth opportunity for Crawley if the quality and configuration of office space being sought can be provided.

- 9.79 Crawley's Main Employment Areas are protected and promoted as the focus for sustainable economic growth. These are long-established employment destinations which make a significant contribution to the economy of Crawley and that of the wider sub-region. The NPPF<sup>89</sup> identifies offices as a main town centre use, requiring that these should in the first instance be directed to Town Centre locations in line with the sequential approach, before edge-of-centre or out-of-centre locations can be considered. Whilst the Town Centre remains an important office location, the other Main Employment Areas have an established office function. Reflecting local circumstances, office development will be exempt from the requirements of the NPPF sequential test where located within the designated Main Employment Areas, or at appropriate locations that are within 500 metres of a public transport interchange.

### **Policy EC6: High Quality Office Provision**

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

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

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

### **Reasoned Justification**

- 9.80 *Through the Economic Growth Assessment (EGA), engagement with local property agents identifies that 'pent up' demand exists in the market for new, high quality office stock across the full size and spectrum, with limited to no demand for the lower quality 'Grade B' space. This reflects the shifting focus amongst office occupiers, with most office activity and churn involving a move into upgraded accommodation. The available portfolio of office space across Northern West Sussex, including Crawley, does not fully match this requirement, and in the absence of any significant quantum of new Grade A office accommodation, this demand cannot be satisfied in full by the available stock.*
- 9.81 *Analysis presented within the emerging Coast to Capital Local Industrial Strategy evidence shows that recent office take up across the Local Enterprise Partnership area has been driven by a lack of higher quality stock. There have been few 4-5 star office transactions compared with more productive competitor areas. The council has constructed over 7000sqm of Grade A commercial office floorspace above its new Town Hall in the town centre, but beyond this there is currently little new high quality office space in Crawley. With the available lower grade space not meeting market demands, Crawley's office market is still characterised by an over-supply of lower grade office provision. Therefore, the issue for Crawley is very much a qualitative one, and moving forward, the EGA recognises the lack of quality office stock as a key challenge facing the Northern West Sussex Functional Economic Market Area.*
- 9.82 *The NPPF is clear that planning policies should create the conditions in which businesses can invest, adapt and expand, taking account of local business needs, and*

<sup>89</sup> National Planning Policy Framework, Glossary, page 68 (2021) MHCLG

seeking to build on existing strengths, counter any weaknesses, and address the challenges of the future<sup>90</sup>. The Northern West Sussex office market is being suppressed by an insufficient supply of high quality new stock, and Crawley, as the main driver of the sub-region market, has an opportunity to support economic growth in the functional economic market area through ‘step-change’ interventions that support delivery of the type and configuration of office provision sought by the market. Therefore, Policy EC6 supports, within the designated Main Employment Areas, the upgrade of existing offices and the delivery of new high quality office stock.

- 9.83 *Recognising the established role of Crawley’s Main Employment Areas as a focus for sustainable economic growth, and their significant role in promoting local and sub-regional economic growth, the Local Plan is positive in supporting economic development within these locations. The NPPF identifies offices as a Main Town Centre use, requiring through the sequential test that office development should in the first instance be located in the Town Centre, before edge-of-centre or out-of-centre sites can be considered. Whilst office development is supported within Crawley Town Centre, the national policy does not take account of local circumstances in Crawley, specifically that the town has dedicated Main Employment Areas, including Manor Royal, as the largest business location in the Gatwick Diamond.*
- 9.84 *To support economic growth in Crawley and create conditions in which business can invest, where office development is proposed in the Main Employment Areas, it will not be necessary for applicants to demonstrate that the sequential test<sup>91</sup> is satisfied. For office development, the NPPF defines ‘edge-of-centre’ as including ‘locations outside the town centre but within 500 metres of a public transport interchange’<sup>92</sup>. To support sustainable economic growth in Crawley, where office development is proposed within 500 metres of a public transport interchange, it will also not be necessary for applicants to demonstrate that the sequential test is satisfied.*
- 9.85 *Office development at Gatwick Airport is specifically considered under Local Plan Policy GAT4 (Employment Uses at Gatwick).*

### **Visitor Accommodation**

- 9.86 A number of hotels and other forms of visitor accommodation are located in Crawley. These are situated throughout the borough, but are particularly concentrated around the Town Centre and at Gatwick Airport. Hotels are identified by the NPPF as a main town centre use, and should be located in the town centre in the first instance. However, in Crawley hotels frequently serve airport-related users including passengers and air crew, and given the way in which hotels are used, Gatwick Airport is considered to represent a sustainable hotel location.
- 9.87 Hotels are located elsewhere in Crawley, including in some Main Employment Areas. Where hotel use is proposed in Manor Royal, it will be necessary to demonstrate how the development will support the core business function of the area, particularly given the business land supply constraints in Crawley.
- 9.88 Local Plan Policy GAT3 outlines that the provision of airport-related parking will only be permitted within the Gatwick Airport boundary and must be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface

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<sup>90</sup> National Planning Policy Framework, paragraph 81 (2021) MHCLG

<sup>91</sup> National Planning Policy Framework, paragraph 87 (2021) MHCLG

<sup>92</sup> National Planning Policy Framework, Glossary (2021) MHCLG

transport access to the airport. This applies to the provision of airport-related vehicle parking at hotels.

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

Hotel and visitor accommodation should be directed to the Town Centre or Gatwick Airport.

Where hotel and visitor accommodation development is proposed outside the Town Centre or Gatwick Airport, compliance with the NPPF sequential test for main town centre uses must be demonstrated.

For all hotel and visitor accommodation applications, the specific locational requirements below will apply:

#### **Gatwick Airport**

Applications for hotel and visitor accommodation within the Gatwick Airport boundary are exempt from the NPPF ‘town centre first’ approach and application of the sequential test will not be required. It will be necessary to demonstrate that the development will not have a detrimental impact on the long-term ability of the airport to meet operational land and floorspace requirements as it grows. Car parking related to on-airport hotel development must meet the requirements of Policy GAT3.

#### **Locations outside Gatwick Airport**

Applications for hotel and visitor accommodation in Manor Royal should demonstrate how the development will cater specifically for the business needs of Manor Royal, including through the provision of business support facilities and staff amenities as per Local Plan Policy EC3 (Manor Royal).

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

### **Reasoned Justification**

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

*and Manor Royal BID at an early stage to scope the type of facilities needed to enable any hotel proposal to appropriately support the Manor Royal business function.*

- 9.91 *Airport parking should be located within the airport boundary and, therefore, Policy EC7 contains the appropriate text to ensure consistency with the approach of Local Plan Policy GAT3.*

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

- 9.92 The evening and night-time economy refers to those commercial activities that operate into the evening and night, at a time when retail and other daytime uses typically cease. It can include arts, culture and entertainment uses (such as cinemas, theatres, restaurants, bars and nightclubs) that can appeal to a wide cross-section of the population and a variety of age groups.
- 9.93 Crawley's evening and night-time economy is focused in the Town Centre, particularly around the historic High Street, with some venues in other locations. When managed correctly, a successful evening and night-time economy becomes part of a town's character and atmosphere, extending vitality beyond regular working hours, creating jobs, and adding to its attractiveness as a place to live and visit. However, there is a balance to be struck, as evening and night-time uses that are inappropriately located can create or exacerbate negative impacts including nuisance, noise, odour, crime and anti-social behaviour. It is important that evening and night-time uses are carefully planned so that they are complementary to, rather than conflict with, neighbouring uses.

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

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

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

Development will not be permitted where it would create or exacerbate existing problems when considered against the criteria set out above. In all cases, the NPPF 'agent of change' principle will form a material consideration.

### **Reasoned Justification**

- 9.94 *A successful evening and night-time economy can add vibrancy and vitality to a location, helping to generate activity whilst meeting local needs. In order to avoid conflict with existing amenity sensitive uses, proposals for evening and night-time economy uses should be sited in appropriate locations, and carefully planned to take account of cumulative impact on the character and function of the town, local amenity, and having regard to impacts on anti-social behaviour.*
- 9.95 *Crawley Town Centre, particularly the historic High Street, represents an established focus for evening and night-time uses. These can add to the vibrancy of the Town Centre, attracting visitors and also support the needs of its growing residential*

population. However, there is a need to ensure that such uses are carefully planned, having regard to the ‘agent of change’ principle, to avoid conflict with existing residential uses. There is also a need to ensure that where uses are proposed that would operate predominantly during the evening, this would not result in blank facades or frontages that fail to engage with the public realm and street scene during daytime hours.

- 9.96 *Crawley’s neighbourhood parades are situated in residential areas, and any evening or night-time economy uses in these locations and elsewhere in the borough will need to be carefully managed to ensure that there is not a negative amenity impact on nearby residential uses, nor on the function of the neighbourhood centre itself.*
- 9.97 *Manor Royal is a 24-hour main employment area, with a number of commercial and business uses that operate through the night. It is recognised that some evening and night-time uses, subject to their scale and function, may be appropriate to support the principal business function of Manor Royal and to meet the needs of people working in Manor Royal, particularly those working night shifts. Where evening and night-time economy uses are proposed in Manor Royal, particular regard should be had to the requirements of Local Plan Policy EC3.*

### **Supporting the Creative Industries**

- 9.98 The creative industries sector, which makes up over five per cent of the UK economy and employs more than two million people, is one of the fastest growing, contributing £115.9 billion of GVA in 2019<sup>93</sup>. Through its Gatwick 360° Strategic Economic Plan, the Coast to Capital Local Enterprise Partnership identifies the creative industries sector as a key competitive advantage for the area, outlining that highly innovative micro, small and medium-sized businesses are now increasing in number, not just in the traditional creative hubs of Brighton and Croydon, but also in the towns surrounding Gatwick Airport. The LEP objective to create the economic conditions for innovation to continue to flourish is supported in the Local Plan.

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

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

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

#### **Reasoned Justification**

- 9.99 *Work undertaken by the Arts Council through its Active Lives survey shows that Crawley performs lower in terms of participation in the arts and creative sectors compared to neighbouring areas, with the borough falling within the bottom 33% nationally and being the only West Sussex authority ranked this low.*
- 9.100 *The creative industries sector captures a broad range of typologies, including Advertising & Marketing; Architecture; Arts & Crafts, Culture & Exhibitions; Markets and*

<sup>93</sup> DCMS Economic Estimates 2019 (provisional): Gross Value Added (revised 19 February 2021)

*Food & Drink Sales; Design (including digital, product, graphic and fashion design); Film, TV, video, radio and photography; IT Software and Computer services; Publishing; Museums, Galleries and Libraries; Music, Performing and Visual Arts; Arts/Crafts workplaces and studios.*

- 9.101 *The Economic Growth Assessment finds that Crawley performs relatively poorly in relation to new business start-ups, with a lower proportion of the resident population setting up new businesses in the borough than elsewhere across the South East and UK. It underlines the opportunity for local economic policy and strategy to address this trend through targeted intervention, for example through raising awareness about the opportunities and benefits associated with starting a business and/or around provision of dedicated incubator space. A new Crawley Innovation Centre has been granted planning permission, bringing a major technological asset to the borough that will support existing advanced engineering businesses and enable growth in new and emerging sectors such as clean energy and quantum technologies, providing vital grow-on space that will enable hi-tech small businesses (SMEs) to scale up.*
- 9.102 *Many of the creative uses listed above fall within the business use sectors, and are supported in broad terms by the economic policies of the Local Plan. However, other creative industry uses will fall outside of the business sectors and within the Commercial, Business and Service (Use Class E), for example food and drink stalls or cultural uses. Where this is the case, development should be directed to the Town Centre in the first instance, and the NPPF sequential and (where required) impact tests will need to be satisfied where development of this nature is proposed at edge-of-centre or out-of-centre locations. The Hawth Theatre Main Employment Area represents a particular focus for arts, culture, performance and exhibitions.*
- 9.103 *Gatwick 360° identifies the need to support the creative industry sector through the provision of essential technology, including the roll out of 5G connectivity to key locations including Gatwick Airport. To support this objective, it is important that new development takes the opportunity to incorporate provision for gigabit-capable full fibre broadband to ensure that fibre or other cabling does not need to be retrofitted.*

### **Flexible Temporary Cultural and Creative Uses**

- 9.104 Where sites and buildings have been long-term vacant, including where unoccupied in the period before development with planning permission is implemented, it may provide an opportunity for temporary use to accommodate cultural and creative industries. Such temporary ‘meanwhile’ uses can help stimulate activity and vibrancy, making efficient use of sites whilst they would otherwise remain unused. By enabling vacant units and sites to be taken up on a temporary basis by occupiers seeking to test new business concepts, introduce pop-up stores or event spaces, the approach can generate interest and footfall whilst providing confidence for new and existing small and medium-sized enterprises (SMEs) investing in Crawley.

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

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

- a. would generate footfall and stimulate activity, including through the provision of active and engaging frontage where appropriate;



- b. would be appropriate to its location in terms of amenity and disturbance, having regard to the agent of change principle;
- c. would be sustainably located close to public transport links;
- d. where proposed on land or buildings are subject to a Local Plan allocation or planning permission, the temporary use would not prejudice the timely implementation of planned development;
- e. would not result in an adverse impact on the economic function of the Main Employment Area.

### **Reasoned Justification**

- 9.105 *The use of buildings and spaces for temporary cultural and creative uses can help stimulate vibrancy, vitality and viability in town centres and other areas by generating social and economic value from vacant properties. Such ‘meanwhile’ uses can also help maintain active frontages and reduce the risk of buildings falling into disrepair. The benefits of meanwhile use also include short-term affordable commercial accommodation for SMEs and individuals, supporting innovation, boosting the local economy and providing new and interesting shops, cultural and other events and spaces. Parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties.*
- 9.106 *Events and activities such as festivals, seasonal markets, exhibitions, performances, and outdoor concerts are not always dependent on using a dedicated cultural facility or venue and may seek to make use of a range of outdoor spaces including streets, parks and other public areas. These may include street markets and ‘pop-up’ bars and food stalls. These types of activities offer a way for everyone to experience and participate in Crawley’s rich cultural life. The opportunity to incorporate these uses should be identified and facilitated through careful design.*

### **Employment Development and Amenity Sensitive Uses**

- 9.107 The relationship between employment and amenity sensitive uses, such as residential uses, must be carefully managed to minimise the scope for conflict. The employment function of the designated Main Employment Areas should not be undermined by the inappropriate introduction of new residential or other amenity-sensitive uses, nor should the amenity of existing residential or other amenity sensitive uses be compromised by employment development that would result in nuisance to existing occupiers. Scope for conflict between uses can be reduced through applying the ‘agent of change’ principle, whereby development that would introduce a new land use (whether this is a noise sensitive use or a noise generating use), is responsible for managing the impact of that change.

#### **Policy EC11: Employment Development and Amenity Sensitive Uses**

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

Where residential or amenity-sensitive development is proposed adjacent to Main Employment Areas, the principal concern will be to ensure that the economic function of the area is not constrained. The proposed development must be designed to mitigate impacts from existing or future employment uses on its occupiers. Residential development within the Main Employment Areas, except within the Town Centre, will not be supported.

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

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

### **Reasoned Justification**

- 9.108 *The Main Employment Areas are designated to support economic growth in Crawley, and their role is protected to meet employment land and floorspace requirements and ensure that the economic function (as existing or in the future) of these areas is not unduly constrained by the inappropriate introduction of amenity-sensitive uses.*
- 9.109 *Some types of economic development may result in issues of noise or other forms of disturbance, which if located close to existing amenity-sensitive uses, could result in nuisance to occupiers. It is recognised that some Main Employment Areas are situated in close proximity to existing residential or amenity-sensitive uses and, in these cases, it will be necessary for development to ensure that the impact on the amenity of local residents has been fully addressed and mitigated. This is most notably the case at the south-east and south-west of Manor Royal, and the employment land at Forge Wood, where there is little separation between nearby residential development and the Main Employment Area. Recognising the scope for conflict between uses in these areas, Buffer Zones are identified in Manor Royal at Tinsley Lane and Tushmore Lane, and at the Forge Wood employment land, as identified on the Local Plan Map. Within these areas, particular care should be taken to ensure that economic development proposals do not adversely impact upon the amenity and setting of nearby amenity-sensitive uses.*
- 9.110 *Equally, it is recognised that the Main Employment Areas represent the key focus for economic development in Crawley, and the economic function of these areas should not be constrained by the inappropriate introduction of residential or other amenity-sensitive development. This reflects the NPPF, which is clear that ‘existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established’<sup>94</sup>. This is expanded upon by PPG: Noise, which recognises that new development may represent an ‘agent of change’ and is clear that regard should be had ‘not only the current activities that may cause a nuisance, but also those activities that businesses or other facilities are permitted to carry out, even if they are not occurring at the time of the application being made’<sup>95</sup>. To promote the continued functionality of Main Employment Areas, where residential development is proposed within or adjacent to Main Employment Areas, regard will be had to the potential impact on the operation of existing economic uses, as well as future employment uses, to ensure that the economic function of the Main Employment Area is not undermined.*

### **Neighbourhood Centres**

- 9.111 As a New Town, Crawley is built on the neighbourhood principle, with each neighbourhood centre providing its own local shops in a dedicated neighbourhood parade, alongside facilities and services that support day-to-day needs of residents, including community centres, public houses and local level employment. Although shopping habits have changed over time, the neighbourhood parades remain an

<sup>94</sup> National Planning Policy Framework, paragraph 187 (2021) MHCLG

<sup>95</sup> Planning Practice Guidance: Noise, paragraph 009 Reference ID: 30-009-20190722 (2019) MHCLG

important part of Crawley's make-up; representing a key element of its New Town character, serving as sustainable locations for local retail and employment and acting as hubs for day-to-day community life.

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

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

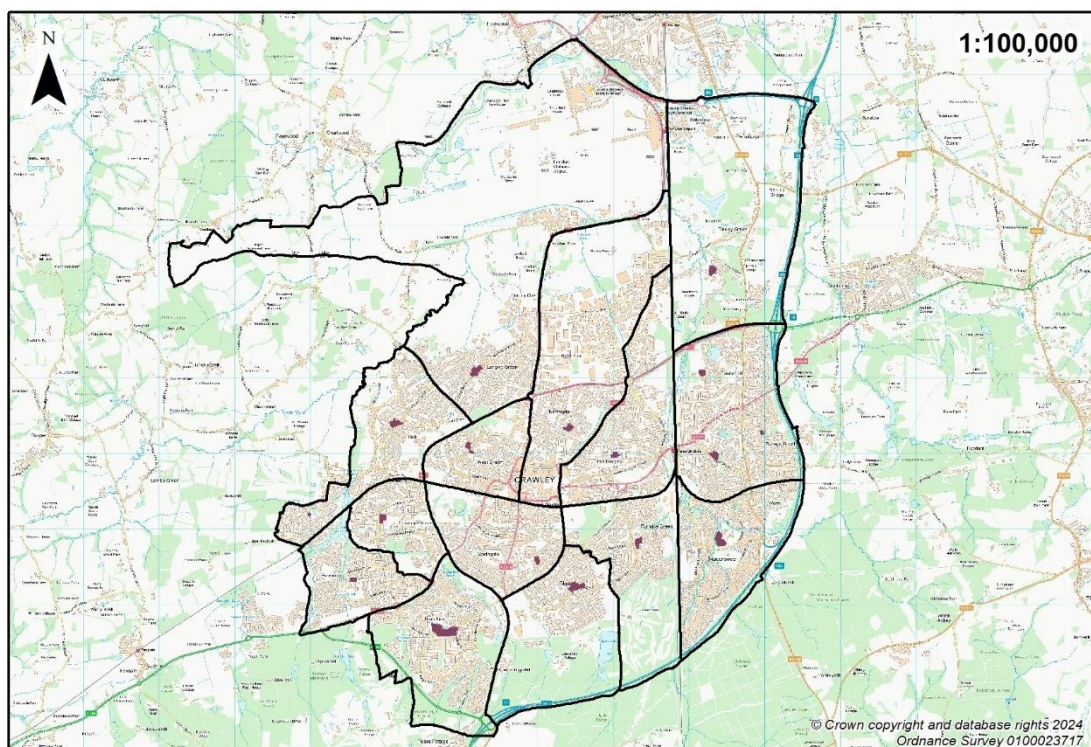
In neighbourhood parades, new floorspace and changes of use will be supported provided that development:

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

#### **Reasoned Justification**

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

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



Neighbourhood Parades (Policy EC12)

Figure 18: Crawley's Neighbourhood Parades

### Rural Economy

9.114 Crawley is a predominantly urban borough, though the countryside beyond its Built-up Area Boundary contains some agricultural, commercial and recreational enterprises. The NPPF<sup>96</sup> recognises that rural businesses should be allowed to grow where this can be achieved in a manner that is sustainable and appropriate to the countryside setting. This must be balanced against an overall need to protect the intrinsic value and beauty of the countryside, avoiding inappropriate development that would have an urbanising effect.

#### Policy EC13: Rural Economy

Development that supports the sustainable growth of the rural economy in Crawley's countryside will be supported provided it:

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

Development proposals which would result in the permanent loss of the best and most versatile agricultural land (Grades 1, 2 and 3a in the DEFRA Agricultural Land Classification

<sup>96</sup> National Planning Policy Framework, paragraphs 84-85 (2021) MHCLG

system) will not be permitted unless it can be demonstrated that there are no appropriate alternatives and there are over-riding sustainability benefits.

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

**Reasoned Justification**

9.115 *The NPPF supports the sustainable growth and expansion of businesses in rural areas, but is clear that this should be achieved in a manner that respects the character of the countryside. The NPPF requires planning policies and decisions to contribute to and enhance the natural environment, including through protecting and enhancing valued landscapes, recognising the intrinsic character and beauty of the countryside, and preventing new development from contributing to unacceptable levels of pollution<sup>97</sup>. The NPPF is clear that planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation<sup>98</sup>.*

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<sup>97</sup> National Planning Policy Framework, paragraph 174 (2021) MHCLG

<sup>98</sup> National Planning Policy Framework, paragraph 185 (2021) MHCLG

## Gatwick Airport

- 10.1 Gatwick Airport lies within the borough of Crawley and at peak times, prior to the Covid-19 pandemic, was the busiest single runway airport in the world. In 2018/19, Gatwick Airport handled 46.4million passengers. The presence and operation of an international airport within the borough generates specific planning issues which need to be addressed by local planning policies. The Airport generates a significant number of economic benefits both directly through its own employment requirements but also, indirectly, through the wider benefits to the regional and local economy which make Crawley and the wider Gatwick Diamond area attractive to employers and businesses. However, it also generates significant environmental impacts particularly as a result of air traffic movements and surface access to the airport. The airport operator and the councils around the airport work together to seek to reduce any significant adverse effects.
- 10.2 The council is consulted on any developments which the airport operator proposes to undertake under its permitted development rights. The council, as the Local Planning Authority, also determines any planning applications for more significant developments which are not classified as permitted development. Development required to support the growth in capacity of the airport over 10mppa, for example through the routine use of the northern standby runway, would be considered as a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008, and as such would be determined by the Secretary of State for Transport, advised by the Planning Inspectorate through the Development Consent Order (DCO) process.

### Chapter Content

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

### The Key Issues

- 10.4 There are a number of key evidence documents which need to be taken into account including the national policy background in terms of airport growth and runway issues.
- 10.5 The National Aviation Policy Framework, 2013, makes it clear in paragraph 5.9 that *“Land outside existing airports that may be required for airport development in the future needs to be protected against incompatible development until the government has established any relevant policies and proposals in response to the findings of the Airports Commission”*. Following the work of the Airports Commission to examine the scale and timing of any requirement for additional runway capacity in the south east, the government set out its preferred option for a new Northwest runway at Heathrow in the *“Airports National Policy Statement, (ANPS): new runway capacity and infrastructure at airports in the South East of England”*, adopted in June 2018. The ANPS also references the Airports Commission’s findings on the need for more intensive use of existing infrastructure at other airports. In its document, *“Beyond the Horizon: The Future of UK Aviation: Making best use of existing runways”*, June 2018, the government recognises that the DfT’s aviation forecasts (2017) reflect accelerated growth at London’s main airports. This is putting pressure on existing infrastructure, despite significant financial investments by airports over the past decade. *“Beyond the Horizon”*, therefore, sets out the government’s support of airports beyond Heathrow making best use of their existing runways, provided that all relevant considerations,

particularly economic and environmental impacts and proposed mitigations are addressed.

- 10.6 The government published its draft Aviation Strategy, “Aviation 2050; The Future of UK Aviation” in December 2018, covering all aspects of aviation including planning for airport growth. The draft document stated that the government believed forecasted aviation demand up to 2030 could be met through expansion at Heathrow and other airports making best use of their existing runways subject to environmental issues being addressed. It noted that the Airports Commission recognised that whilst there may be a demand case beyond 2030, there is not necessarily a corresponding environmental or commercial case and that the government is not at the point of making a decision on long term need. The document explained that the National Infrastructure Commission (NIC) would be asked to consider the needs case for future runways beyond 2030 and outlined ways this could be addressed. The NIC Baseline report in 2021 states that the second National Infrastructure Assessment, due to be prepared in 2023, will not consider airport capacity because this is dependent on future demand for air travel following the Covid-19 pandemic, and the approach to expanding runway capacity in the South East, which is currently unclear.
- 10.7 With regard to the safeguarding of land for airport growth, the draft Aviation Strategy 2050 document stated in paragraph 3.66 that “it is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth”. It referred to the NPPF which restates the government’s commitment to “identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice” and that the government believes this provides sufficient guidance for local authorities to consider the future needs of airports and their surface access requirements when developing local plans. The NPPF also requires local plans to provide for any large scale transport facilities that need to be located in the area, and for the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements. Whilst NSIPs are subject to a separate planning process within the national planning regime, the policies set out within the Local Plan will inform any Local Impact Report submitted by the council to the Secretary of State in connection with the determination of an NSIP.
- 10.8 The Aviation Strategy 2050 has not been progressed in full, but the government published “Flightpath to the Future” in May 2022. This highlights the impact of the Covid-19 pandemic on aviation and the opportunities arising from Brexit. “Flightpath to the Future” therefore sets out the government’s strategic framework for aviation over the next ten years. In setting out its support of airport growth where it is justified, the document refers to the existing policy frameworks (*Beyond the Horizon*, and the *Airports National Policy Statement*), clarifying that these statements are the most up to date policy on planning for airport development. It states they continue to provide a robust framework for airports to grow within strict environmental criteria, and that the expansion of any airport must meet its climate change obligations to be able to proceed.
- 10.9 An existing S106 Agreement, most recently updated and signed between Gatwick Airport, WSCC and CBC in May 2022 supports the growth of the airport by making best use of its existing one runway, two terminal configuration, whilst ensuring that measures are in place to minimise its short and longer-term environmental impacts. It

also considers how the councils around the airport work together to bring benefits to the Airport and the communities it serves and affects.

- 10.10 The Gatwick Airport Master Plan (July 2019) anticipates capacity on its single runway could increase to between 58 and 61 million passengers per annum by 2032/33. The Gatwick Airport Master Plan also sets out two further scenarios for growth of the airport, through operational use of the existing northern standby runway and through continuing to safeguard land for an additional runway to the south of the airport. The Master Plan states that Gatwick is no longer actively pursuing plans for an additional runway, but that there nevertheless remains the possibility that the airport may wish to build and operate one in the future. The document states that it is in the national interest to continue with the strategy of land safeguarding.
- 10.11 The Covid-19 pandemic had a very significant impact on airport operations, with a substantial reduction in flight and passenger numbers during 2020 and 2021. However, passenger numbers are gradually returning to pre-Covid levels, [with 32.8million passengers using the airport in 2022.](#) and It is anticipated they will continue to grow over the Plan period, albeit perhaps at a slower rate in line with wider economic recovery.

## Local Plan Policies

### Development of the Airport

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

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

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

- i. The proposed use is appropriate within the airport boundary and contributes to the safe, secure and efficient operation of the airport;
- ii. The adverse 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, that where necessary satisfactory safeguards are in place to ensure impacts are appropriately mitigated and, as a last resort, fair compensation is secured;
- 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, **equivalent or greater value for biodiversity like for like** compensation is secured;

- iv. Adequate supporting infrastructure, particularly for surface access, can be put in place; and
- v. Benefits to Crawley's local economy and community are maximised.

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

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

### **Reasoned Justification**

- 10.13 *Much of the pre-pandemic growth in passenger numbers at Gatwick Airport, through the use of larger aeroplanes and more flights at “off-peak” times and seasons, has not required new development to support it. The Airport Operator also has permitted development rights to bring forward new facilities to support rising passenger numbers. Measures are in place, through the S106 Agreement between CBC, WSCC and Gatwick Airport to mitigate some of the adverse impacts of airport growth, and where planning permission is required for new development at the airport, the council will need to ensure that it contributes to the safe and efficient operation of the airport and that its impacts are minimised or mitigated as required, that sufficient supporting infrastructure can be put in place, and that local benefits are maximised. The council will consider the cumulative impact of numerous small developments. To secure appropriate mitigations, planning conditions and further S106 obligations will be sought.*
- 10.14 *Sections 14 and 23 of the Planning Act 2008 define Nationally Significant Infrastructure Projects to include the construction, extension or alteration of a runway or building at an airport expected to be capable of increasing by at least 10 million per year the number of passengers for whom the airport is capable of providing air passenger transport services. Applications for such developments would, therefore, be determined by the Secretary of State through the Development Consent Order (DCO) process. The Gatwick Airport Master Plan 2019 proposal to use the standby runway would increase capacity by over 10mppa and will therefore be determined through a DCO process. Gatwick Airport formally commenced this process 2019, publishing its Preliminary Environmental Information Report in 2021 and undertaking further consultation in the summer of 2022. **The DCO application was submitted in early July 2023 and Submission of the DCO is currently anticipated in early summer 2023 with, should it be approved, operational use is anticipated to start in starting in 2029.** Passenger throughput of 75.6 million per annum would be reached in 2038 with 80.2 million passengers per annum anticipated by 2047. The council expects the environmental impacts of these significant capacity increases to be minimised, or mitigated, infrastructure to be provided and related benefits to the local area to be maximised and will take this into account in preparing its Local Impact report. The council is working with neighbouring authorities to ensure these objectives are achieved across the wider area.*
- 10.15 *Proposals that contribute to the safe, secure and efficient operation of the airport are considered to include operational uses such as terminals, runway facilities, aircraft maintenance, freight handling facilities; directly related development including transport interchanges, admin offices and parking; as well as less directly related*

development (e.g. hotels, conference and leisure facilities, offices and retail) where the relationship to the airport is explicitly justified and is of an appropriate scale relative to airport activities. In all cases, proposals should have regard to the NPPF requirements for promoting public safety through anticipating and addressing possible malicious threats, including through proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security<sup>99</sup>.

### Future Runway Development and Need for Safeguarding

- 10.16 The Aviation Policy Framework (March 2013) outlines that land outside existing airports that may be required for airport development in the future needs to be protected against incompatible development until the government has established any relevant policies and proposals in response to the findings of the Airport Commission.
- 10.17 The government established its policy and proposals in response to the findings of the Airports Commission when it published the ANPS in June 2018, supporting a third runway at Heathrow. The ‘Beyond the Horizon Making the Best Use of Existing Runways’ government policy statement, also published in June 2018, also referred to the Heathrow decision and provided policy relating to all other airports, supporting the expansion of their capacity through using their existing runways. However, the draft national Aviation Strategy, Aviation 2050, which was published in December 2018, after the ANPS was published, as detailed in paragraph 10.8 above, states that it would be prudent to retain safeguarding policies at other airports. 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 southern runway, as the Local Plan must be consistent with national policy. Paragraph 1.36 confirms that a review of the Local Plan will be triggered should certainty be gained over national aviation policy on safeguarding.

#### Policy GAT2: Safeguarded Land

##### Safeguarding for a southern ~~second~~ runway

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

Small scale development such as changes of use, minor building works and residential extensions within this area will normally be acceptable. Improvements to existing employment buildings including small scale extensions and refurbishment will normally be acceptable provided it will not lead to a significant intensification or significant increase in the scale of development. Where appropriate, planning permission may be granted on a temporary basis. The airport operator will be consulted on all planning applications within the safeguarded area.

<sup>99</sup> National Planning Policy Framework, paragraph 97 (2021) MHCLG

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

**Reasoned Justification**

10.18 The original requirement to safeguard land for a second runway at Gatwick was contained in the 2003 Aviation White Paper. The Aviation Policy Framework (March 2013) clarified the position, and the draft Aviation Strategy, published after the ANPS, also refers to the need for safeguarding, as set out above. The most recent policy statement on aviation, Flightpath to the Future, 2022, sets out objectives for the next 10 years, and states that the ANPS and Beyond the Horizon set out the most up to date policy on planning for airport development. These documents do not refer to safeguarding, but refer back to the Aviation Policy Framework 2013. Should future national aviation policy provide certainty that safeguarding is no longer required at Gatwick, then a Local Plan Review will take place in order to assess the appropriate uses for the currently safeguarded area (paragraph 1.36).

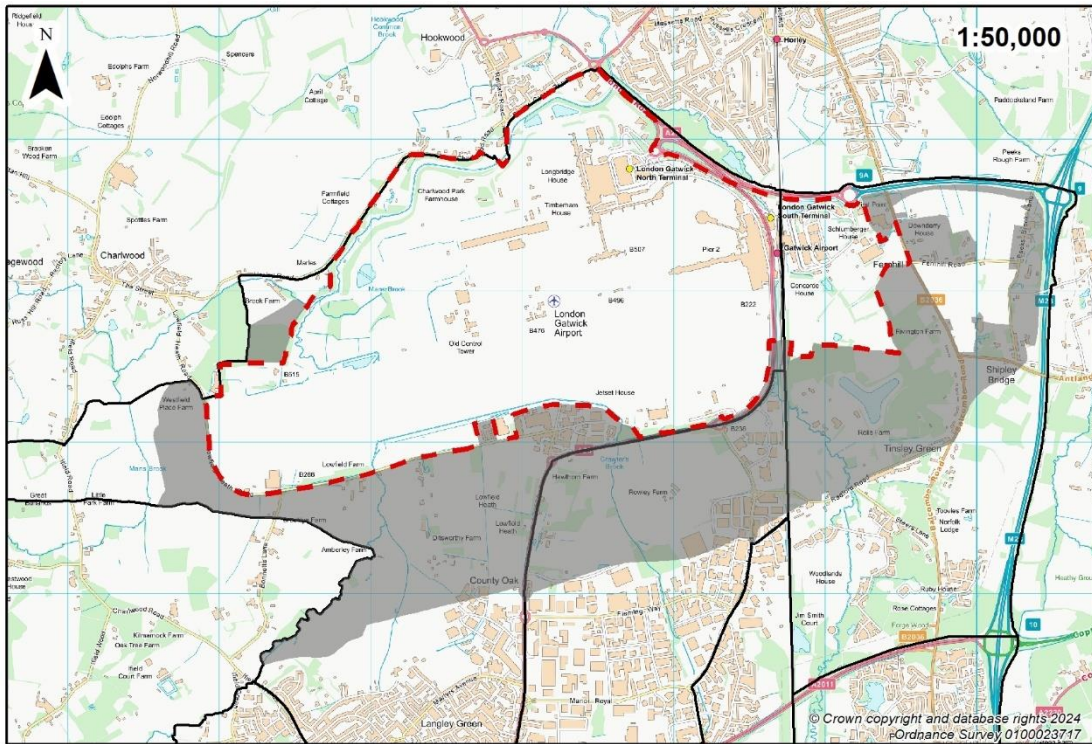


Figure 19: Gatwick Airport Boundary and Safeguarded Land

10.19 For the purpose of policy interpretation small-scale development **also** includes development such as residential extensions, **updating or refurbishment of buildings**, some changes of use, or other minor **building works such as changes to the external appearance. development. Small scale improvements to employment buildings and refurbishment will normally be acceptable within a similar footprint, provided that there is not a significant intensification of development on the site, either individually or cumulatively with other extensions. Appropriate temporary uses may include those that are short term, with a defined end date and which don't involve significant construction.** Incompatible development within safeguarded land

*is regarded as development which would add constraints or increase the costs or complexity of the development or operation of an additional runway. The airport operator will be consulted on all applications within the safeguarded area for a second runway.*

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

### **Gatwick Related Car Parking**

- 10.23 Passengers that fly in and out of Gatwick need to be able to travel to and from the airport by a variety of means of surface transport. The airport operator is required to prepare an Airport Surface Access Strategy (ASAS) (most recently published October 2022) to address and appropriately manage the surface access need of aircraft passengers and staff. Controlling the extent of airport related parking helps encourage the use of alternatives whilst ensuring sufficient parking is available to passengers who have no other option.

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

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

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

### **Reasoned Justification**

- 10.24 *The 2022 s106 legal agreement between Crawley Borough Council, West Sussex County Council, and Gatwick Airport Limited sets out an obligation for the airport operator to provide sufficient but no more on-Airport public car parking spaces than necessary to*

achieve a target of 48% of passengers travelling to the airport by public transport. Achieving this still requires the provision of significant parking facilities for those who choose to drive to the airport by private car. Airport-related car parking includes parking associated with hotel guests leaving cars whilst flying from the airport. The Airport operator's interim Car Parking Strategy (April 2017) demonstrates the amount of car parking that needs to be provided as passenger throughput grows but is still commensurate with a target of 48% of passengers travelling to the airport arriving by public transport. The most recent ASAS, October 2022, includes a more ambitious target of 52% of passenger journeys being made by public transport.

- 10.25 A significant number of airport parking spaces are provided in on-airport locations within the airport boundary. There are also a number of well established businesses with the appropriate planning consents which provide long-stay Gatwick related parking in off-airport locations.
- 10.26 However, there are also a number of operators which offer car parking services to airport passengers which use sites that do not have planning permission for airport related car parking. This includes off-airport sites, without the appropriate planning permission, typically located in the countryside or previously developed land which has been used for employment or other purposes. Such off-airport sites are not in the most sustainable locations, may not be appropriate for parking and may lead to the loss of the countryside or employment sites.
- 10.27 It is considered that sites within the airport boundary provide the most sustainable location for the additional long stay parking which needs to be provided as passenger throughput grows whilst still supporting the public transport target. Sites within the airport boundary are close to the terminals and can help reduce the number and length of trips. The Airport operator is responsible for meeting the modal split target for passengers and the level of provision of car parking spaces makes an important contribution to meeting this target. Therefore, it is important that the provision of car parking spaces is appropriately managed in the most sustainable way.

### **Employment Uses at Gatwick**

- 10.28 Gatwick Airport is identified as a Main Employment Area, with much of its employment floorspace dedicated to airport-related uses that are needed to facilitate the safe and efficient operation of the airport. A number of office developments at the airport had conditions placed on them when they were permitted to restrict them to airport-related uses such as offices for airlines, handling agents and the airport operator, who are involved in the direct provision of services relating to the operation of the airport. Given the importance of these uses to airport operations, it is necessary to ensure that on-airport office floorspace is retained for airport-related use unless it can be demonstrated that the floorspace is no longer required for this purpose.

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

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

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

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

### **Reasoned Justification**

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

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

## Crawley Town Centre

- 11.1 At the heart of Crawley is the Town Centre, originally planned as a retail, commercial and civic centre for the New Town. Centred around Queens Square and County Mall shopping centre, it extends to Memorial Gardens in the east, west to the historic High Street, north to Crawley Leisure Park and south to Crawley Railway Station.
- 11.2 The Town Centre performs a number of important roles. It is a leading sub-regional destination for retail and leisure, popular with Crawley residents and attracting visitors from a wider catchment outside the borough. It is a place to work, designated as a Main Employment Area and employing 13,450 people (14% of all jobs in Crawley) across a range of sectors including retail and leisure, administrative and professional business services. It is also a sustainable place to live, with a residential population that has risen to approximately 1,500 people in recent years. Moving forward, significant new residential development is planned and it is recognised that the Town Centre, as well as being a retail, leisure and employment destination, is diversifying to become a neighbourhood in its own right.

### Chapter Content

- 11.3 This chapter establishes the planning strategy for Crawley Town Centre, recognising its important role for local communities and applying a positive approach to support its growth, management and adaptation. The policies within this chapter pro-actively support the role and function of the Town Centre, seeking to build upon its existing strengths as a retail, leisure and commercial destination, and balancing these with its growing role as a place to live. The challenges facing town centres must also be recognised, including out-of-centre and online retailing, and changes to shopping habits following the Covid-19 pandemic. It is vital that the Town Centre is able to adapt and meet these challenges, with the policies within this chapter seeking to ensure that the vitality and viability of the Town Centre is supported, with sufficient flexibility in place to enable it to respond positively and effectively to changes in circumstance over the Plan period.

### The Key Issues

- 11.4 Crawley Town Centre is healthy, vibrant and competitive, offering a good mix of shops, restaurants and leisure uses and providing a pleasant environment for residents and visitors. The very accessible location of the Town Centre, with excellent public transport accessibility and a high availability of car parking represents a significant draw, encouraging visitors to visit Crawley over other centres. It also has a significant cluster of professional services employers, including those offering legal, financial, recruitment, marketing and property services. These factors make an important contribution to the sustainability of the Town Centre economy.
- 11.5 The ambition is for Crawley Town Centre to become a dynamic sustainable business growth hub with a bold and vibrant community heart for Crawley and the Gatwick Diamond. This will drive a diverse retail and leisure offer, excellent public realm, high quality town centre living and a thriving evening economy Through the Crawley Growth Programme and the Towns Fund, an investment package of over £64million has been secured for the borough, funded by the Coast to Capital Local Enterprise Partnership (LEP), West Sussex County Council, Crawley Borough Council and the government. As part of this work, the Town Centre Regeneration Programme has already delivered significant improvements to Queens Square, Queensway, and Eastern Gateway,

accompanying the construction of a new town hall, new Grade A business space and high quality residential accommodation, along with major improvements to the public space and road networks. Further investment is to come through regeneration of Crawley Station Gateway, including the bus station.

- 11.6 Crawley's economy was badly affected by the Covid-19 pandemic, with many town centre businesses having to close during periods of lockdown and impacted during this time by a dramatic fall in visitor numbers. More broadly, macro-level changes to shopping habits, including the role of online retailing and a reduction in expenditure, have resulted in a lesser reliance on traditional town centre retail, presenting a further challenge to growth. In response, the council has led efforts to boost the town centre economy and generate new business investment and jobs through facilitating major programmes of new infrastructure, amenity and residential development. The Council's 'One Town' Economic Recovery Plan provides an overarching, strategic plan for all existing delivery programmes including Crawley Growth Programme and the Town Centre Regeneration Programme, setting out a vision for Crawley's future socio-economic prosperity. The recently established Town Centre BID is also having a positive impact, working to bring in new investment, occupiers and visitors to Crawley Town Centre.
- 11.7 Given the longer-term challenges facing town centres Crawley Town Centre has needed to adapt, diversifying its offer to include a greater range of leisure- and experience-focused main town centre uses, cafes and restaurants. There is an increasing contribution to be made to town centre vitality and viability by complementary uses including offices, community space, and facilities to support a growing town centre residential population. Recognising the Town Centre as a well-connected and sustainable location for people to live, the growing residential population is itself adding further footfall and vibrancy.
- 11.8 The Crawley Retail, Commercial Leisure and Town Centre Neighbourhood Needs Assessment (2020) has evaluated Crawley's strengths and weaknesses as a town centre, and identifies growth forecasts for the Plan period. The study finds that Crawley Town Centre has proven to be relatively robust to the challenges facing many town centres, retaining much of its market spend, as opposed to this being lost to other centres within the catchment area. The study identifies capacity for up to 10,000sqm new convenience retail floorspace, and up to 29,700sqm comparison retail floorspace over the period to 2035. Given the much slower outlook for retail growth in a post-pandemic world, the Local Plan does not specifically allocate sites for retail. These figures are therefore considered to represent a sufficiently precautionary approach to identifying retail capacity for the Local Plan period.
- 11.9 It is vital that Crawley Town Centre is able to adapt and diversify in light of changing circumstances to help ensure its vitality and viability over the longer-term. It is not just retail that makes for a successful town centre, and a range of main town centre uses can help generate footfall and activity. Through positively planning for a range of main town centre uses, including those which that support the day-time and evening economy, and balancing this with opportunities for residential development and supporting neighbourhood facilities and services, the Local Plan puts in place a framework that will enable Crawley is able to diversify and adapt over the Plan period, ensuring it is best placed to build upon its established role as a vibrant and competitive sub-regional town centre.



## Local Plan Policies

### Primary Shopping Area

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

#### Strategic Policy TC1: Primary Shopping Area

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

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

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

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

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

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

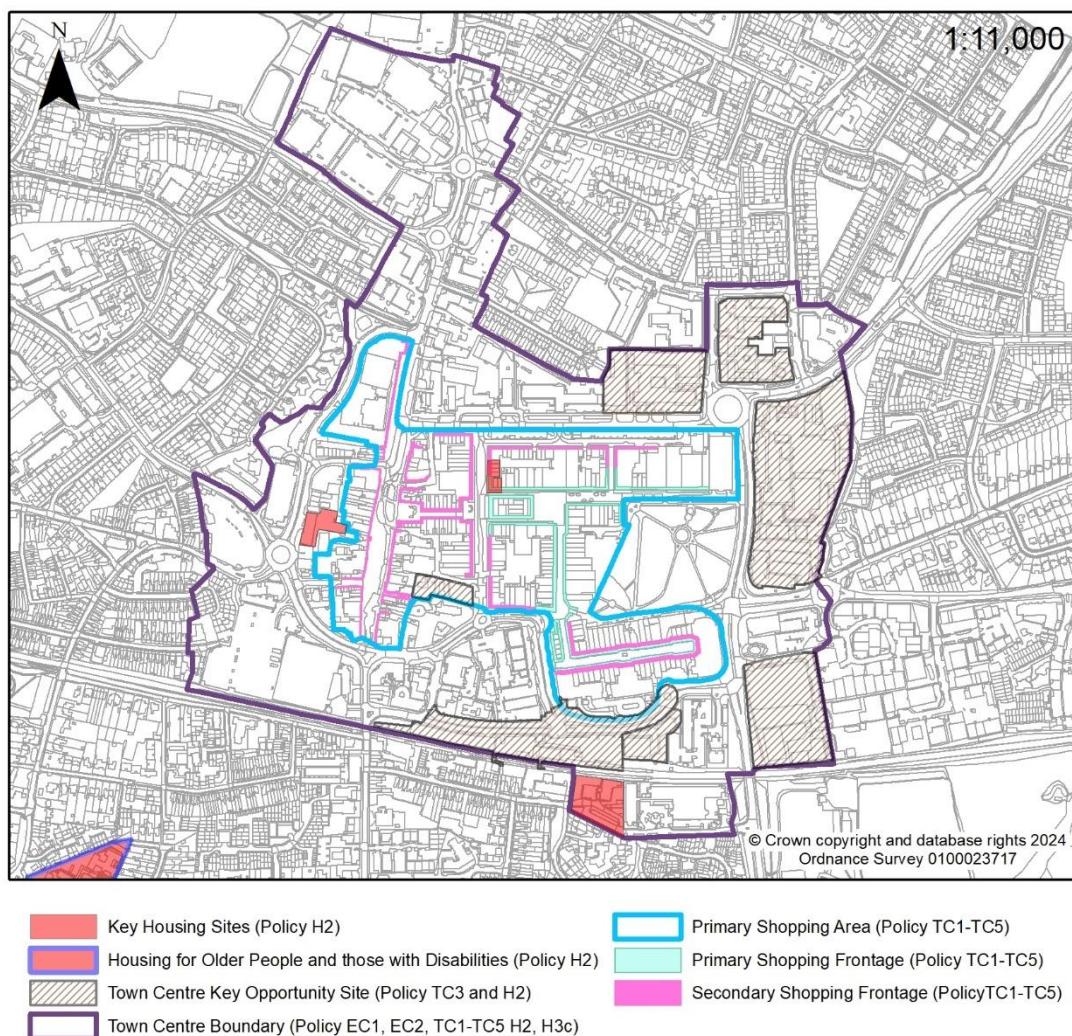
The amalgamation or sub-division of units at ground and upper floor levels will be supported, subject to the requirements of Policy EC2 where loss of employment floorspace is proposed.

### Reasoned Justification

11.11 *Crawley is a leading Town Centre within the sub-region, popular with residents and visitors, and represents a key location for retail, leisure, employment, and residential uses. Crawley's strong shopping offer is the core factor that shapes the heart of the Town Centre, supported by a range of other main town centre uses that provide interest and variety. In challenging times for the retail sector, it is vital that Crawley Town Centre is planned in a positive and flexible manner that enables it to respond effectively to change so that it retains its long-term vitality and viability and continues to be a thriving and competitive town centre.*

11.12 *On 1 September 2020 the Use Class Order was revised to allow for greater flexibility for changes of use. The newly created Class E (Commercial, Business and Service Use) includes shops, financial & professional services, restaurants & cafes, gymnasiums, medical and health services, offices, research & development, and (subject to matters*

of amenity) light industrial use. Drinking establishments and hot food takeaways are moved to the Sui Generis Use Class. Each of these uses, particularly if designed with active and engaging frontages, can contribute positively to generating footfall and creating a vibrant sense of place. First and foremost, the Town Centre is a main employment area, with a retail core at its heart. Whilst continuing to emphasise the important role of a strong retail core within the Primary Shopping Area, Policy TC1 supports a broad range of uses capable of diversifying Crawley’s offer that will help ensure the Town Centre remains a vibrant destination during the daytime and also through the evening into the night.



**Figure 20: Crawley Town Centre Inset Map**

11.13 *The Primary Shopping Area contains the primary and secondary shopping frontages at ground floor level. The primary shopping frontages are a focus for uses falling within Class E (Commercial, Business and Service Use). The secondary frontages are more flexible, enabling the same uses as for the primary shopping frontages, but also supporting drinking establishments and hot food take-away uses. At ground floor level in both the primary and secondary shopping frontages, flexibility is afforded for other appropriate main town centre uses and town centre neighbourhood facilities provided it can be demonstrated through an Economic Statement that the proposed use supports the overall vitality and viability of the town centre. This flexible approach has historically helped secure the reuse of vacant units, generating footfall and activity.*

- 11.14 *Within the Primary Shopping Area, use of upper floors for main town centre uses, town centre neighbourhood facilities (Policy TC2) and residential will be supported provided this is consistent with the ‘Agent of Change’ principle with regards to matters of residential amenity, and with Policy EC2 where a loss of employment floorspace is proposed.*
- 11.15 *It is not the intention to support residential development at the expense of the Town Centre as a main employment area, and whilst the principle of residential is supported in many cases, it is vital that a balance is struck to ensure that the retail and economic role of the Town Centre is not undermined. Residential development will not be acceptable in locations where this would impact negatively on the vitality and viability of the Town Centre, and residential development that would undermine the function of the Town Centre as a main employment area will not be permitted. The Primary Shopping Area should retain a retail-led economic focus, promoting active frontages and an engaging street scene.*

### **Town Centre Neighbourhood**

- 11.16 Crawley Town Centre is a sustainable location for residential development, as recognised through the mixed-use allocations of Policy TC3 (Key Opportunity Sites within the Town Centre Boundary) and also through its identification under Policy H2 (Key Housing Sites) as a broad housing location. The Town Centre residential population has grown significantly in recent years, both as a result of planned developments and also through Permitted Development. This has meant the number of residents living in the Town Centre has increased significantly and, from a starting point of 214 residential units in 2014, there are now over 1,000 dwellings in the Town Centre, and a residential population of around 1,500 people. It is anticipated that, over the Plan period to 2040, a further 1,900 dwellings will come forward in the Town Centre, bringing the total to just over 3,000 residential units.
- 11.17 As a New Town, Crawley is planned on the ‘neighbourhood principle’; that is, the town has been developed on the basis of planned neighbourhoods, each designed to provide its residents with sustainable local access to the facilities and services that are required to meet the day-to-day needs. It is recognised that the Town Centre, having increased its residential population over a relatively short timeframe, lacks some of the supporting facilities that Crawley’s purpose-planned neighbourhoods benefit from. The provision of neighbourhood facilities can support the needs of town centre residents and can help generate activity that enhances town centre vitality and viability. The use of under-utilised space at upper floor level, if carefully planned, can present a good opportunity for such uses.

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

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

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

- v. Leisure provision;
- vi. Accessible high quality green, open or recreational amenity space.

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

In all cases, town centre neighbourhood facilities must support the overall vitality and viability of the Town Centre. Where provision of town centre neighbourhood facilities would result in a net loss of employment floorspace, the requirements of Policy EC2 must be met.

### **Reasoned Justification**

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

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

- 11.21 The Local Plan identifies Key Opportunity Sites within the Town Centre Boundary. These are recognised as presenting significant scope for development that meets identified needs in sustainable and accessible locations. The regeneration and improvement of brownfield sites through standalone and mixed-use development can support and diversify Crawley’s role as a sub-regional centre, enhance its increasing role as a place to live, whilst strengthening its employment base to create a good living and working environment.
- 11.22 Recognising the need for both employment and residential land, the Town Centre Key Opportunity Sites are identified for development comprising main town centre uses or mixed-use development that comprises residential use with either main town centre uses and/or town centre neighbourhood facilities.

### Policy TC3: Town Centre Key Opportunity Sites

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

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

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

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

It should be demonstrated that:

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

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

#### **Reasoned Justification**

11.23 *The council wishes to support the regeneration and efficient use of under-utilised sites within the Town Centre Boundary, particularly where this will maximise the potential of outworn buildings and underused land. Development at the Town Centre Key Opportunity Sites should support and diversify Crawley's role as a primary sub-regional centre, enhancing the vitality of the Town Centre, and supporting economic and residential growth. There is a real opportunity to provide residential development in a highly sustainable location, and to unlock modern commercial space that will uphold and diversify the Town Centre's role as a main employment area. There is also a significant opportunity to provide neighbourhood facilities for residents, improve the links between different areas of the Town Centre to create a good living and working environment.*

11.24 *The Town Centre needs to adapt and evolve if it is to remain competitive in a changing economic climate. Policy TC3 applies a flexible approach to support a range of development typologies on the Town Centre Key Opportunity Sites. Development at these sites has significant potential to accommodate a mix of uses and take a balanced approach in meeting the economic and housing needs of the borough. The Key*

Opportunity Sites present an opportunity to accommodate some retail growth to meet the potential need set out in paragraph 11.8 above but are not allocated specifically for retail but also for other Main Town Centre uses, and residential. Given the policy objective to support a flexible range of main town centre uses and residential at the Key Opportunity Sites, the retail capacity figures are considered to provide a sufficiently precautionary forecast of retail capacity for the Local Plan period to 2040.

- 11.25 The Town Centre is a highly sustainable location for residential development and, given Crawley's significant level of housing need and constrained housing land supply, the Town Centre Key Opportunity Sites will make an important contribution to housing delivery. At least 1,500 dwellings are anticipated across all of these sites, as part of mixed use proposals. A mix of uses on these sites will ensure the Town Centre's economic function is retained and enhanced, whilst providing the opportunity to accommodate town centre neighbourhood facilities and, where located adjacent to public realm or road frontages, ensure active frontages are provided. Requirements set out in Policy H3c must also be adhered to when designing a scheme which includes a residential element within the Town Centre.
- 11.26 Some proposals, which would be of significant benefit to the vitality of the Town Centre and help to meet other needs within the borough, may not be able to accommodate residential into schemes for operational or viability reasons. In these cases, information will be required to demonstrate how the proposals will deliver wider social and economic benefits and that the development as proposed would not impact unacceptably on the ability of the council to meet objectively assessed housing need. Office uses would also meet an identified need, and leisure uses can support the regeneration of the Town Centre. The council, working with WSCC and Crawley College through One Public Estate, has aspirations to create a commercial eastern gateway with significant new office presence on the Town Hall and County Buildings sites.
- 11.27 Crawley College campus has a considerable amount of underused accommodation poorly configured for educational use, especially on the northern part of the site. There is potential for the land to be more effectively used, whilst ensuring that the principal educational function of the site is retained. Redevelopment of the wider site will enable, over time, the College to develop a modern, high quality educational facility on the south of the site, with the northern part of the site helping to address Crawley's housing needs. A Master Plan covering the whole campus has been prepared and agreed with the council, in accordance with a s106 legal agreement relating to the planning permission for the Science Technology Engineering and Maths (STEM) building (CR/2019/0403/FUL). Any future development on the Crawley College site must accord with the master plan agreed in 2022 (or an appropriate amended master plan agreed with the Local Planning Authority) and demonstrate that it can be achieved in a manner that prioritises the ongoing viability and function of Crawley College as a Further Education facility.**
- 11.278 This Policy identifies specific Key Opportunity Sites where mixed-use development is promoted. Policy H2 identifies other sites within the Town Centre that are specifically for residential development, and identifies the whole Town Centre as a broad location for future housing in the anticipation that other sites may come forward over the Plan period.

### **Active and Engaging Frontages**

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

can all contribute to the vitality and viability of the Town Centre, but must be carefully planned and designed to ensure that development engages and interacts positively with the public realm.

11.2930 The use of active frontages, where there is an active visual engagement between the public realm and the ground floors of buildings, generates vibrancy and can encourage footfall. Active frontages can be incorporated into a range of main town centre developments to ensure that ground floor development adjacent to the public realm contributes positively to the Town Centre's overall sense of place and its role as a location for people to visit, live and enjoy.

11.301 Conversely, poorly designed development that does not appropriately engage with the public realm can undermine the Town Centre environment. Inactive frontages, such as blank façades or closed window displays, can create a hostile and unwelcoming aesthetic that reduces legibility and vibrancy, and should be avoided.

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

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

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

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

#### **Reasoned Justification**

11.312 As the range of Town Centre uses becomes more diverse, the incorporation of active frontages into development can play a key role in ensuring that a positive interaction is retained with the street scene. Carefully designed frontages will help generate activity and interest, supporting the overall vitality and vibrancy of the Town Centre. Development that is adjacent to the public realm (whether the street, or formal/informal public space, including parks) must provide a positive interface to the public realm.

11.323 In doing so, the positive relationship between a development and its adjacent public realm will better integrate development into the urban fabric, promoting activity, interest and a sense of safety to its setting. This quality is assisted where the front façade of buildings, including the main entrance, face and open towards the street. The objective of achieving active frontages can be realised through a variety of means. Overall, the desirable outcome is avoiding blank walls to increase visual interest, generate activity and improve surveillance. As residents will seek privacy, ground floor dwellings with windows fronting onto public realm or streets, unless carefully designed, could result in a blank façade as residents use blinds or curtains permanently. The incorporation of other uses attracting visitors at ground floor level can help create activity.

## Town Centre First

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

### Policy TC5: Town Centre First

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

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

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

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

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

Neighbourhood Parades are Local Centres in Crawley’s retail hierarchy. Development at the Neighbourhood Parades will not be subject to the NPPF sequential or impact tests, though must meet the requirements of Local Plan Policy EC12.

### Reasoned Justification

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

11.356 *For the purposes of policy interpretation, for retail uses Town Centre sites are defined as those locations falling within the Primary Shopping Area as identified on the Local Plan Map. Sites falling outside of the Primary Shopping Area, though within the Town Centre Boundary, are defined as edge-of-centre sites and these are the next most sequentially*



*preferable sites. With the exception of the Neighbourhood Parades, all locations beyond the Town Centre Boundary, in retail terms, represent out-of-centre locations. All other main town centre uses, unless otherwise stated should be directed to sites within the Town Centre Boundary, before edge-of-centre (within 300 metres of the Town Centre Boundary) or out-of-centre locations are considered.*

- 11.367 *Crawley's Neighbourhood Parades perform an important local function, offering a range of shops and services to meet the day-to-day needs of residents. Each neighbourhood centre serves a localised catchment in the region of 2,500 homes, and their operation is akin to that of a local centre. Given the important local role of the Neighbourhood Parades, Policy TC5 recognises these as appropriate locations for retail, and the NPPF sequential and impact tests will not apply at the Neighbourhood Parades. However, development will be required to comply with Local Plan Policy EC12: Neighbourhood Centres.*
- 11.378 *County Oak Retail Park and London Road Retail Park provide a significant out-of-centre retail warehouse offer. These locations are not designated as centres, and applications for main town centre uses in these locations will be required to satisfy the requirements of the NPPF sequential, and as required, impact tests.*
- 11.389 *As identified through Policy EC6, office development within the designated Main Employment Areas, and at sites outside the Town Centre Boundary that are within 500 metres of a public transport interchange, will be exempt from the sequential test. This reflects the approach of protecting and supporting the established economic function of the Main Employment Areas as a focus for economic growth. As per Policy EC6, hotel and visitor accommodation development within the Gatwick Airport boundary will also be exempt from the sequential test.*
- 11.3940 *There is capacity for up to 10,000sqm convenience retail floorspace and up to 29,700sqm comparison retail floorspace over the Plan period. Where retail or leisure development is proposed outside of the Town Centre Boundary, impact on the vitality and viability of Crawley Town Centre, Neighbourhood Centres, and other centres within the retail catchment as existing and planned, will be a material planning consideration.*
- 11.401 *Notwithstanding the relative strength of Crawley borough as a whole, the Town Centre specifically has suffered a fall in market share of overall spending at physical stores in the last decade as shoppers have turned to online shopping and out-of-centre retailers. This trend has potential to 'chip away' at the vitality and viability of the Town Centre. Edge-of-centre and out-of-centre retail development, even where this is of a quantum that falls beneath the NPPF threshold of 2,500sqm, has the potential to impact negatively on the health of the Town Centre. Therefore, for retail development, a locally specific threshold of 500sqm gross floorspace is set as the point at which a proportionate retail impact assessment will be required. For leisure development, the NPPF threshold of 2,500sqm as the trigger for undertaking an impact assessment will apply.*
- 11.412 *Retail planning applications may take a number of forms, including for standalone development, extensions that would result in a gross retail floorspace increase, or applications to vary the range of goods sold from an existing retail unit. In all cases, it will be important that matters of impact on the Town Centre, Neighbourhood Parades and other centres within the retail catchment are appropriately considered and evidenced by the applicant to ensure there is not a significant adverse effect arising from the proposed development.*

11.423 *The impact of edge-of-centre or out-of-centre retail or leisure development will be determined by a number of factors, including (but not limited to) forecast trade draw and the extent to which the type of development proposed is considered to compete with or complement existing and planned town centre uses on a like-for-like basis. As such, where the relevant impact threshold is triggered, edge-of-centre or out-of-centre retail or leisure proposals will be required to demonstrate that the development will not result in a significant adverse impact on the Town Centre or deliverability of planned investment, particularly at the Town Centre Key Opportunity Sites identified by Policy TC3. Applications should be accompanied by a proportionate impact assessment to demonstrate that the proposal is acceptable in impact terms, making clear how the proposed development would complement, rather than compete with, the current/future town centre, neighbourhood centre offer, and the offer of other centres in the retail catchment.*

**11.44 *Introduction of Use Class E has placed a wide range of uses including retail, food, financial services, gyms, healthcare, nurseries, offices, and light industry into a single use class, allowing movement within that Class unless otherwise restricted. As the provisions of Use Class E are not linked to spatial boundaries, it potentially undermines application of the town centre first approach. Therefore, where new Class E development is permitted, the council will consider applying a condition to restrict the authorised use to that which has been justified in the application submission. This ensures that unintended adverse impacts on town centre vitality and viability are avoided. Avoidance of such movement within Class E may be necessary for other reasons, including in relation to water neutrality and parking provision.***

11.435 *The Town Centre Supplementary Planning Document (2016) provides further guidance on the application of the sequential and impact tests in Crawley. This document will be updated as set out in the Local Development Scheme.*

# Housing

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

*By 2040, ~~5,330~~ 5,030 new homes will have been built to support the needs of the growing population. A mix of new homes will be designed for residents in all stages of life. These will be built in locations which respect the town's unique development and design principles and preserve the most valued of the town's environmental features.*

## Housing Delivery

- 12.1 The population of Crawley has been rising significantly over the past three decades, increasing by about 22% from 88,750 in 1991 to 106,600 in 2011. It stood at approximately 118,500 residents in 2021. In Crawley, population growth has been driven strongly by natural change (i.e. births outnumbering deaths), due to the typically younger population structure reflecting its New Town history. Crawley also sees a notable level of international migration and net out-migration compared to other parts of the country. Crawley's population was expected to grow by over 16% over the period 2019-2039<sup>100</sup> to reach 135,262 residents.
- 12.2 The Northern West Sussex Housing Market Area overlaps closely with the Crawley Travel to Work Area and is characterised by a high level of self-containment, reflecting the strength of Gatwick Airport and Manor Royal. However, whilst the labour market area extends to include Horley, Redhill, Leatherhead and Dorking (essentially extending north to the M25), there is a significant difference in house prices in the authorities north of this Housing Market Area.
- 12.3 Crawley is a compact borough, with developable land suitable for housing further constrained by the presence of the airport in the north of the borough. The town's recent history as a twentieth century New Town means the area was comprehensively planned and built out on a neighbourhood basis. A further neighbourhood was added in the 1990s (Maidenbower), and the most recent neighbourhood, Forge Wood, located to the North East of the built-up area, is now under construction to provide around 1,900 dwellings supported by neighbourhood community facilities. In addition to these neighbourhood developments and limited intensification of the small areas of unconstrained land within the built-up area, a further new neighbourhood beyond the borough boundary to the west (Kilnwood Vale) in Horsham District is also under construction.

### Chapter Content

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

### The Key Issues

#### Past House Building:

- 12.5 The number of dwellings built each year has varied considerably in Crawley. Following a peak in house building in 2007/08, there was a significant reduction in completions, despite a considerable number of planning permissions granted. This was largely due to the national economic downturn. Since the preparation and adoption of the current Crawley Borough Local Plan in 2015, completions have significantly exceeded the average annual requirement set out in the adopted Plan (340 dwellings per annum). Consequently, Crawley comfortably passed the government's national Housing Delivery Test in 2018, 2019, 2020 and 2021, scoring 181%, 235%, 252% and 406% respectively.

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<sup>100</sup> 2014-Based Population Projections, Northern West Sussex Strategic Housing Market Assessment (2019) Icen Projects

12.6 Notwithstanding this, delivery fell short of the 2015 Local Plan Housing Trajectory. This predicted a peak in delivery in 2017/18, whereas that year actually saw delivery fall in comparison with 2016/17. Failure to achieve the levels of delivery detailed in the Housing Trajectory has primarily been due to delays in the coming forward of a number of key site allocations. Windfalls on the other hand have been higher than anticipated, particularly in the form of developments benefiting from permitted development rights for the conversion of offices to dwellings. Of the 3,590 gross completions over 2015-23, 28% came from developments benefiting from these permitted development rights, where extraordinary densities have been achieved that would not otherwise have been approved through a formal planning application. Lower levels of completions were delivered during 2022/23. This was due to a combination of water neutrality requirements and resource and labour supply constraints affecting the construction sector (partly linked to post-covid recovery).

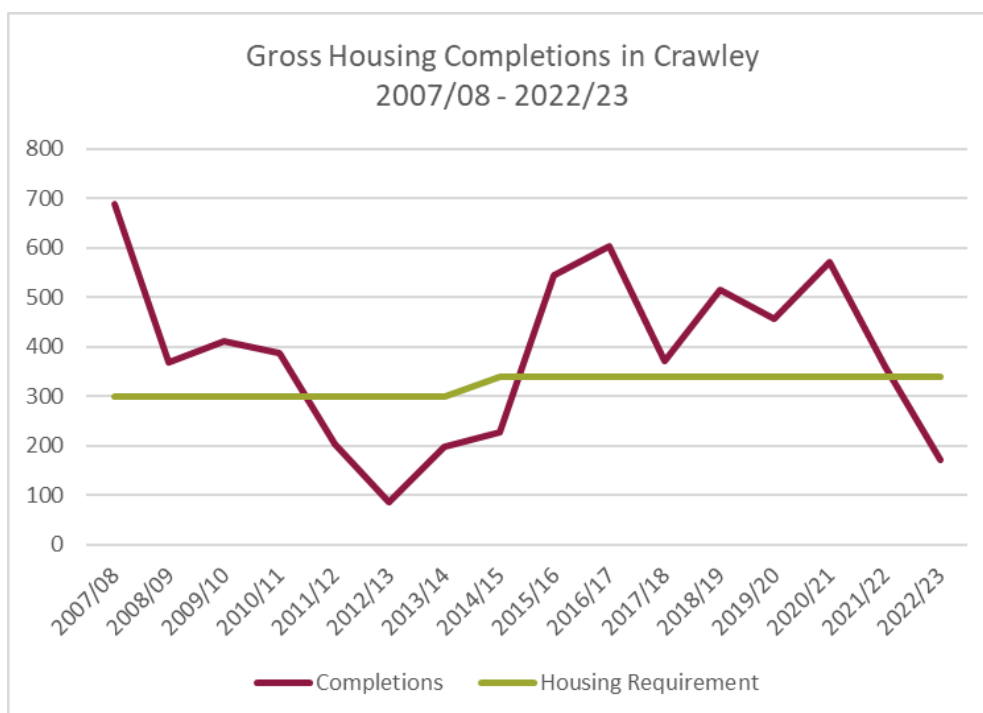


Figure 21: Gross Housing Completions in Crawley 2007/08 - 2022/23

### Housing Need:

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

12.8 Crawley’s total annual housing need, based on the Standard Method, is 755 dwellings per year.

Households 2023	49,653
Households 2033	55,333
Change in Households	5,680
Per Annum Change	568
Affordability Ratio (2022)	9.27
Affordability Uplift to Household Growth	32.94%
<b>Total Need (dwellings per annum)</b>	<b>755</b>

Figure 22: DLUHC Standard Method Housing Need Calculation

### Housing Land Supply:

- 12.9 Local authorities are encouraged to deliver a wide range of high quality homes, to widen opportunities for home ownership and to create sustainable, inclusive and mixed communities. In doing so, planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (i.e. families, elderly, and people with disabilities).
- 12.10 Using a flexible approach, empty houses and buildings should be brought back into residential use and where appropriate, powers of compulsory purchase used more widely. Planning policies should avoid the long-term protection of sites and land allocations should be regularly reviewed. Proposals for mixed tenure residential development should generally be approved where there is an identified need for additional housing provided there are no reasons why development would be inappropriate.
- 12.11 Crawley’s development as a series of comprehensive neighbourhoods, many of which have also accommodated a significant amount of infill housing in the last decade, means that the capacity of the built-up area to accommodate further housing is limited. The planned areas of open space (both formal and informal) within the neighbourhoods are clearly highly valued by local residents for their amenity and recreational value. The tight relationship between the Built-Up Area Boundary and the borough’s administrative boundary further limits capacity. The need to safeguard land for a potential southern runway at Gatwick Airport, together with the noise contours associated with both a single and potential southern runway scenario, limits the potential for additional housing in the northern parts of the borough. In line with Policy EP4, housing development will not be permitted in noise contours above the 60dB LAeq 16hr noise threshold both for the existing and potential southern runway. Areas on the periphery of Crawley, both within and outside the borough boundary, will continue to be assessed in partnership with the adjoining authorities.
- 12.12 As the land within Crawley is constrained, it is anticipated that the adjoining authorities will be asked to meet approximately 58% of Crawley’s housing need. However, this is predominantly in the form of market housing, where the market has choice. Duty to Cooperate discussions will include reference to the need to address meeting Crawley’s critical affordable housing need, in particular where developments are close to Crawley’s boundaries, although this is unlikely to meet Crawley’s full unmet affordable need. This places a greater emphasis on the need to secure affordable housing from those schemes within the borough, whereby the council’s percentage affordable requirement achieves significantly less if also accounting for the out of borough housing provision. Therefore, the council intends to robustly defend its affordable housing policy on residential developments, particularly through on-site provision of affordable housing, within the borough.

### Crawley's Strategic Housing Land Availability Assessment

12.13 To determine a realistic assumption for the quantum of housing land supply within the borough, a Strategic Housing Land Availability Assessment (SHLAA) has been undertaken<sup>101</sup>, and forms part of the evidence base for the Local Plan. The primary role of the SHLAA is:

- The identification of sites potentially suitable for housing development;
- An assessment of the housing potential and the capacity of these sites;
- An assessment of their suitability, availability and achievability; and
- An assessment of the likely timeframe for development of these sites.

The SHLAA does not determine whether a site should be progressed through the Local Plan process as a housing allocation, nor does it automatically mean that planning permission is certain. It merely carries out an assessment of sites that could be suitable for housing development, and whether and when such sites could be developed.

12.14 Taking into account the suitability, availability, achievability and deliverability of housing sites within the borough, the SHLAA has identified a housing land supply which provides a total of ~~5,873~~ **5,871** net dwellings including windfalls over the period 2021-40. Over the Plan period (i.e. excluding those built during 2021/22; and 2022/23 ~~and 2023/24~~) this amounts to ~~5,023~~ **5,325** net dwellings.

### Crawley's Windfall Allowance

12.15 The NPPF states that local planning authorities can make an allowance for windfall sites in the housing land supply, if compelling evidence is put forward that such sites have and will consistently become available. This allowance should be realistic, having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates, and expected trends.

12.16 It is anticipated that an average of 100 dwellings per annum will come forward through windfall sites over the period 2023-40, amounting to 1,600 dwellings altogether during the Plan period, as detailed in the council's Housing Trajectory.

### **Urban Extensions 'At Crawley':**

12.17 Over recent years, increasing numbers of houses are being built on the peripheries of Crawley's urban and administrative boundaries. Whilst, in some cases, this has been promoted through joint planning between Crawley and neighbouring authorities to come forward as comprehensive new neighbourhoods, such as Kilnwood Vale (2,650 new dwellings<sup>102</sup>), in most other cases this has come forward in piecemeal individual developments of between 30 and 600 new dwellings at a time, tacked on to the existing urban infrastructure.

12.18 Well planned urban extensions which provide comprehensive, sustainable new neighbourhoods with local facilities and services, relate well to their rural landscape character and protect the setting of Crawley's neighbourhoods could form an important way to meet Crawley's housing needs. Therefore, the Local Plan acknowledges that other potential urban extensions to Crawley outside its administrative area could be explored in the future in order to meet the arising housing need of the borough. This work will need to test whether this approach is agreed as a sustainable location in the

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<sup>101</sup> Crawley Strategic Housing Land Availability Assessment (January 2023) CBC

<sup>102</sup> The Joint Area Action Plan allocated this neighbourhood for 2,500 new dwellings. The additional 150 dwellings is due to planning permissions granted to change the initial use of the land within the allocation boundary.

context of the wider Housing Market Area and travel to work area, and whether the existing infrastructure and environmental constraints can be resolved<sup>103</sup>.

- 12.19 In these cases, developments should be laid out and designed to be reflective of their location as part of Crawley and should not result in harm to the setting of the master planned New Town nor result in urban sprawl nor unplanned merging of settlements. They should protect the setting of Crawley's existing neighbourhoods at the edge of the countryside. New development, by its very nature, will always have a significant impact on the sense of place, space and open setting of an area, both perceived and tangible. Careful analysis is therefore required to assess whether certain elements of landscape structure, form, or character are a major component of or contributor to an established, recognised and enjoyed rural landscape setting. Not all areas have the same capacity to accommodate change without harm to the landscape setting. For example, where wide tracts of non-enclosed open fields or grassland exist, there is very limited capacity for change to the rural setting without impacting on the character of the area, and the setting of the areas adjacent to it. The proportion, scale and extent of these areas provides a sense of space and far reaching and expansive vistas. They provide a perceived and real sense of tranquillity due to the extensive absence of buildings and human presence and are important close to Crawley where such areas are very limited. In contrast, areas where the setting is characterised by woodlands or enclosed country lanes or hedgerow corridors provide contained views and a sense of enclosure.
- 12.20 In considering urban extensions, the shared evidence base including the Strategic Housing Market Assessment and Economic Growth Assessment should be referred to. Whilst located within Mid Sussex or Horsham Districts, any urban extension on the edge of Crawley should be meeting the unmet housing needs arising from Crawley, and should therefore meet Crawley's specific needs for affordable housing, housing mix, type, and tenure. The scale of urban extensions could also provide the opportunity to meet unmet employment needs, or infrastructure requirements such as education and health, and could provide strategic leisure facilities serving the wider area.
- 12.21 All infrastructure impacts should be considered cumulatively. Urban extensions should meet their own infrastructure needs on site to serve their new residents. It is inevitable that these residents will also access larger scale existing facilities in Crawley, including the town centre, leisure facilities and transport networks. These will also be affected by development within Crawley and it is important that cumulative impacts are assessed and developments fund improvements to ensure there is no adverse impact on Crawley's residents. In particular, the need for a Western Link Road for Crawley has been recognised but it has not yet come forward despite the development of Kilnwood Vale. If further urban extensions are proposed to the west of Crawley the route, design and delivery options for this multi-modal transport link will need to be addressed. Policy ST4 provides more details for the section which would extend through Crawley Borough and connect with the A23.
- 12.22 Whilst these developments will be outside Crawley's boundary, the following criteria set out below will be used to inform discussions with neighbouring authorities, including through establishing Statements of Common Ground, and potential developers, and the council's responses to emerging policies and planning applications. Development should only come forward through a Plan-Led process, supported by clear cross-boundary and site-specific Local Plan policies. Where appropriate, Joint Area Action Plans would provide the most robust way to ensure

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<sup>103</sup> Consultation Draft Crawley Borough Local Plan Review, paragraph 2.32, Policy H1 and paragraph 12.11 (2023) CBC



Crawley's needs and concerns are fully addressed. Proposals should be supported by a comprehensive Masterplan agreed by the relevant authorities (including the county council).

#### 'At Crawley' Urban Extensions Key Considerations

- 12.23 Housing development through urban extensions on or close to Crawley's administrative borough boundaries will be supported by Crawley Borough Council where it can be shown that:
- i. Cumulative infrastructure needs are clearly identified and programmed for delivery in coordination with new development, and the proposal would not result in severe cumulative impacts of the development for existing residents in Crawley, including in terms of traffic and transport, flooding and drainage, air quality, town centre and community and social facilities;
  - ii. If development is proposed to the western side of Crawley, the scoping, design and delivery of the comprehensive Western 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 Councils;
  - iii. Crawley's character as a compact town within a countryside setting, developed on a neighbourhood principle which maximises the use of sustainable transport is maintained;
  - iv. The design of the urban form and infrastructure is of high quality design which is not unnecessarily prominent in the existing landscape setting;
  - v. Developments are designed and progressed as comprehensive neighbourhoods rather than incremental ad hoc development;
  - vi. Neighbourhood centres containing local facilities and services are provided in order to meet the day-to-day needs of residents;
  - vii. The development helps address unmet development needs arising from Crawley, including in relation to housing mix, type, tenure and affordability (including meeting the 40% affordable housing levels and agreements in relation to the nomination rights for those on the Crawley housing register); complementary employment and economic growth needs; social, education and health needs; and strategic recreation and leisure requirements;
  - viii. Linkages are maintained from Crawley's neighbourhoods through new development to the countryside beyond (both in terms of active transport and visual links) as well as prioritising sustainable modes of transport links (public transport, cycling and walking routes) into existing Crawley neighbourhoods and the town centre, making car journeys a longer, more circuitous option;
  - ix. A landscape character, setting and heritage appraisal has been undertaken which:
    - a. identifies the scale, extent and spatial characteristics of the existing landscape structure and grain, including natural and man-made features, field patterns, views, landscape structure, tranquillity and sense of space or enclosure, and provides an understanding of how they are experienced, used and perceived; and this
    - b. has led to an assessment of the impact of the development on the landscape character, setting and heritage of the area, and the setting of Crawley's neighbourhoods and development is planned to ensure the key landscape

features, character areas, areas of tranquillity and settings are protected, and the way they can be experienced is enhanced.

- x. Development has been designed and planned to carefully address both its connections to existing Crawley neighbourhoods as well as the wider countryside beyond, providing defensible boundaries which both prevents inappropriate merging of settlements or the effects of urban sprawl and ensures the careful stitching together of existing and new built form where appropriate;
- xi. Ancient woodland or veteran trees would not be damaged or lost and an appropriate buffer, in accordance with national guidance, is provided between any such trees and the edge of the development's construction. Any TPO protected trees should be retained where possible and measures to avoid damage and root compaction should be implemented. Where the loss of existing trees is unavoidable, appropriate replacement trees are to be provided;
- xii. Development must incorporate strategic Green Infrastructure throughout, providing ecological linkages, in particular to support pollination, and result in a Net Gain to biodiversity;
- xiii. Development must be designed to exemplar sustainability standards, taking advantage of the potential of a masterplanned approach and economies of scale, and must design in tight energy and water efficiency targets from the outset in order to futureproof developments for a zero carbon future and a changing climate;
- xiv. Development proposals use bespoke Area Wide Design Assessment tools from the outset which will aim to set out and enable development proposals to identify, understand and fit in with the overall form and layout of their surroundings.

### **Housing for Older People and those with Disabilities:**

- 12.24 Although Crawley has a greater proportion of younger people than the rest of the south east, with 60% of its population under 45 years of age, the need to provide housing for older people is an increasingly important issue for Crawley, with 14% of the population aged over 65<sup>104</sup>. The number of people aged 65 and over has been increasing more quickly than other age groups with projected growth in this age group predicted to increase by 63%, over the 20 year period to 2039. It accounts for 35% of the total projected change, with a growth of 9,600 persons between 2019-39 aged 65+<sup>105</sup>.
- 12.25 Housing elderly people, and meeting their needs through either support or care, is a complex matter. Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. New dwellings, as set out in Policy DD2, should be designed to accessibility standards which allow for future adaptation as the circumstances of the occupiers change, allowing for longer supported independent living.
- 12.26 Providing suitable and alternative housing for older people to move into can free up houses that are under occupied. New housing built to more modern standards of sustainability is also attractive to older people as this offers lower maintenance and running costs. While housing for older people may require special consideration with regards to design, proximity to facilities and security, it is usually considered to be the least intrusive form of new housing development, with a lower impact on traffic, often resulting in a reduced parking requirement, and is thereby more readily accepted by

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<sup>104</sup> 2018-based subnational population projections (March 2020) ONS, Figures for 2020

<sup>105</sup> Northern West Sussex Strategic Housing Market Assessment (2019) Icen Project

existing local communities. For this reason, provided the densities of any proposals ensure the capacity of the site is maximised, any site considered appropriate for housing development would be positively considered for older people's accommodation through the decision-making process, where this also offers to meet the required affordable housing and affordable care needs (for both C2 and C3 Use Class development).

- 12.27 The Strategic Housing Market Assessment (SHMA)<sup>106</sup> considers the accommodation needs of older people and those with disabilities together, due to the clear links between age and disability. The 2011 Census indicated that 29% of households within Crawley contained someone with a long term health problem or disability. Of these, 52.6% were aged 65 and over, and a further 21.3% were aged between 50 and 64. This is projected to increase by around 7,000 (41%) in Crawley between 2019 and 2039. In particular, there is projected to be a large rise in the number of people with dementia (68%) and those with mobility problems (63%).
- 12.28 Evidence identifies a need for an additional 1,027 units (51 per annum) to meet the population's specialist accommodation need for older people (retirement/sheltered housing; enhanced sheltered and extra-care housing) and an additional 1,029 residential and nursing care bedspaces over the 20 year period from 2019 to 2039. Of these, 56% are anticipated to be in the market sector, with the remaining 44% needed in affordable tenures.
- 12.29 Supporting working-age adults who have care and support needs to be as independent as possible is equally important. Extra Care Housing can again contribute to meeting the housing and care requirements of some of these adults. West Sussex County Council sees Extra Care Housing as an all age housing solution and is keen to see barriers (such as aged over 55) removed from the criteria for this type of housing going forward. On this basis, specific allocations for housing for older people will also apply for the provision of Extra Care Housing for all ages.
- 12.30 West Sussex County Council has a target of 500 new Extra Care Housing homes across West Sussex by 2025. This target requires a development programme of at least 100 new homes each year, working in partnership with Districts and Boroughs, and with housing providers such as Registered Providers with experience of development of Extra Care Housing. Although there are existing Extra Care Housing schemes in Crawley, there is still, by the available measures, an undersupply of Extra Care Housing. Therefore, there is a need for further development in Crawley in order to meet the estimated demand for two schemes of 60 homes each over the Plan period.
- 12.31 Extra Care Housing schemes can additionally offer services to the local community and develop as a community resource, as well as offering employment and training opportunities in the local communities they serve. Mixed tenure schemes of Extra Care Housing located in areas where the care and support provider could recruit, and which are well located in terms of local available facilities, will be supported.
- 12.32 As Care Home stock forms a very specific part of the housing needs market, it is considered this falls within the definition set out in the CBLP for 'Infrastructure' which confirms that: "infrastructure includes a wide range of services and facilities such as"... "health, social infrastructure, community facilities"... Policy IN1: Infrastructure Provision, therefore, applies in relation to the protection of existing Care Home facilities. Under this Policy the loss of such provision through the redevelopment of

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<sup>106</sup> Northern West Sussex Strategic Housing Market Assessment, Chapter 10 (2019) Icen Projects

sites for alternative uses would be prevented unless an equivalent replacement or improvement is provided, or there is sufficient alternative offer in the area.

## Local Plan Policies

### Housing Provision

- 12.33 The Local Plan provides a supply of housing sites to support delivery towards meeting the needs of present and future generations, whilst reflecting the physical constraints of the borough and the other policy objectives within this Plan.
- 12.34 These constraints include Local Green Space, designated heritage assets (Listed Buildings, Conservation Areas and Scheduled Monuments), Local Wildlife Sites, ancient woodland, structural landscaping, possible airport expansion/aircraft noise, and open space and floodplains. These constraints, together with the tight relationship between the Built-Up Area Boundary and the borough's administrative boundary, significantly limit capacity. The exception to this are the potential opportunities which may be found for higher density schemes within a greater mixed use Town Centre.
- 12.35 It is, therefore, recognised that continued cross-boundary working to understand the nature of the wider housing market area is essential to ensure that housing needs are being met in an appropriate and functional manner. There is already a long-established means of working through numerous joint evidence base documents, a joint Development Plan Document for the West of Bewbush neighbourhood (with Horsham District Council), and the Gatwick Diamond Local Strategic Statement and Memorandum of Understanding.

### Strategic Policy H1: Housing Provision

The council will positively consider proposals for the provision of housing to meet local housing needs, taking a pro-active approach to identifying suitable sites for housing development and working to overcome constraints wherever possible, whilst ensuring against detrimental town-cramming or unacceptable impacts on the planned character of the existing neighbourhoods or on residential amenity.

Proposals that result in a net loss of dwellings will be resisted.

All reasonable opportunities will be considered including: brownfield sites; surplus green space; town centre living; and opportunities on the edge of Crawley, where these are consistent with the other policies and proposals in this Local Plan and the principle of sustainable development.

The Local Plan makes provision for the development of a minimum of **5,330** ~~5,030~~ net dwellings in the borough in the period ~~2024~~ **2023** to 2040<sup>107</sup>.

This minimum requirement will be broken down into an annual average requirement on a stepped basis as follows:

- ~~Years 1-5 (2024-29): 400 dwellings per annum (dpa)~~
- ~~Years 6-10 (2029-34): 360dpa~~
- ~~Years 11-16 (2034-40): 205dpa.~~
- **Years 1-10 (2023-2033): 386dpa**
- **Years 11-17 (2033-2040): 210dpa.**

<sup>107</sup> This includes the additional 10% buffer within Years 1-5 as required by paragraph 74 of the National Planning Policy Framework (2021) as detailed in the council's Housing Trajectory, 31 March 2023

After this supply is deducted from the identified housing need of ~~12,835~~ ~~12,080~~ over the period ~~2024~~ ~~2023~~ to 2040, there will be a remaining unmet housing need, of approximately ~~7,505~~ ~~7,050~~ dwellings, arising from Crawley over the Plan period. This will arise as follows:

- ~~• Years 1-5 (2024-29): 355dpa~~
- ~~• Years 6-10 (2029-34): 395dpa~~
- ~~• Years 11-16 (2034-40): 550dpa~~
- **Years 1-10 (2023-2033): 369dpa**
- **Years 11-17 (2033-2040): 545dpa.**

The council will continue to work closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this need in sustainable locations. This will include continued assessment of potential urban extensions to Crawley.

### **Reasoned Justification**

- 12.36 *The housing figure identified in Policy H1 represents a ‘supply-led’ requirement, and reflects the compact nature of the borough, its limited land availability and significant environmental, potential airport expansion and noise constraints.*
- 12.37 *The majority of housing delivery (against the borough’s housing requirement) will take place in the Years 1–10 of the Plan period, beyond which capacity, and therefore identified delivery, is expected to be significantly lower (as illustrated in the Housing Trajectory). This is partly due to the development of Crawley’s new neighbourhood of up to 1,900 dwellings, Forge Wood, which forms a major part of housing delivery in the first ten years of the Plan period and is the last remaining large area of relatively unconstrained land in the borough (540 dwellings of which remained outstanding as of March 2023). The varied nature of housing land supply (and associated housing delivery) over the Plan period makes it difficult to identify an annual housing delivery target within Policy H1. However, whilst an annualised average delivery of around 314 dwellings per annum is anticipated, a stepped trajectory is reflected in the Policy to account for the higher delivery in the early and middle part of the Plan period and the lower anticipated levels towards the end. On this basis, monitoring of the housing delivery within the borough will reflect the planned approach taken, rather than suggesting “over delivery” followed by “under delivery”.*
- 12.38 *The council has endeavoured to ensure that every opportunity for residential development within the borough has been fully considered through the Local Plan process. Additional sites were proposed through the council’s “Call for Sites” and the council’s Strategic Housing Land Availability Assessment has been updated following the early engagement consultation and subsequent rounds of Regulation 19 consultation. All sites have been reassessed to consider those which are considered to be suitable for development and either ‘deliverable’ in Years 1–5 or ‘developable’ in Years 6–10 or 11–16, and density levels of allocated sites have been reassessed in light of Policy CL4 and the council’s commitment to making effective use of land. The SHLAA also identifies a number of sites which are considered suitable for residential development but unlikely to come forward due to factors such as ownership and viability, and these sites cannot reasonably be expected to count towards housing land supply. However, the council will continue to work proactively with landowners to address the key barriers to bringing these sites forward. The supply figure should therefore be considered as a minimum.*

- 12.39 *The constrained nature of Crawley’s land supply means that approximately 42% of the borough’s predicted housing need over the ~~16~~ **17** years ~~2024~~ **2023** – 2040 can be met within the borough boundaries. The remaining unmet housing need from Crawley, of ~~7,505~~ **7,050**<sup>108</sup>, will need to be considered through Duty to Cooperate discussions as part of the Local Plan Reviews for the other authorities within the Housing Market Area (primarily Horsham and Mid Sussex along with a small part of Reigate and Banstead, particularly an overlap with Horley). The adopted Local Plans for Horsham and Mid Sussex districts had anticipated to provide an additional 3,000 dwellings<sup>109</sup>, above their objectively assessed housing needs, in order to meet Crawley’s unmet need. However, through the Local Plan Reviews this figure is likely to change, particularly as the Standard Method increases their own housing requirements to above their current adopted Plan commitments (see paragraph 2.29).*
- 12.40 *Opportunities for urban extensions immediately adjoining Crawley’s borough boundaries will continue to be explored with Crawley’s neighbouring authorities, taking into account the issues set out in paragraphs 12.17-12.23 above. Also, if safeguarding is lifted and a decision made to locate additional runway capacity elsewhere in the country, opportunities to the north of Langley Green and Forge Wood will be fully assessed for additional housing provision. Efforts will be made to include affordable housing provision to meet Crawley’s needs outside of the borough, wherever possible, particularly if these are close to the borough boundary.*

#### Housing Monitoring and Delivery

- 12.41 *Housing delivery will be continually monitored and reported at least annually through the Authority’s Monitoring Report. Delivery will be assessed against the expectations of the Local Plan Housing Trajectory, and against the annually updated Housing Trajectory. The council will also be monitored through the government’s national Housing Delivery Test. This will be based on the annualised average housing target set by the Local Plan (where the Plan remains up-to-date) over a preceding rolling three-year period. As the anticipated higher delivery in the first part of the Plan period would not be considered as part of the Housing Delivery Test towards the end of the Plan period, a stepped target is established in Policy H1, to ensure the borough is measured against the realistic position of a constrained and reducing land supply.*
- 12.42 *Whilst the scope for the council to deliver private development, once planning permission is granted, is limited, the council has a history of intervening and supporting delivery of stalled development. In addition, the council has a robust own-build programme. Should delivery rates fall below 95% of the housing requirement, through the Housing Delivery Test, the council will be required to prepare an Action Plan. This will assess the causes of under-delivery and identify actions to increase delivery in future years. However, even where delivery is exceeding or meeting the Housing Delivery Test, as part of the council’s monitoring the implementation of policies, the progress of key development sites identified by the Plan will be assessed and, where these are not coming forward in line with the anticipated Housing Trajectory timescales or delivery rates, the council will seek to identify the causes and whether there is scope for support or intervention.*
- 12.43 *However, early delivery will not override the need for a scheme to be policy compliant and meet the expectations of the Local Plan as a whole for good design and high quality*

<sup>108</sup> ~~12,080~~ **12,835** dwellings housing need (Standard Method 755 x ~~16~~ **17** years) – ~~5,330~~ **5,030** dwellings total supply ~~2024~~ **2023** – 2040 (CBC Housing Trajectory, March 2023) = ~~7,505~~ **7,050** dwellings unmet need.

<sup>109</sup> 1,500 dwellings to be provided in Mid Sussex district (between April 2024 and March 2031: Policies DP4 and DP5, Mid Sussex District Plan 2014 – 2031, 2018) and 1,500 dwellings to be provided in Horsham district (between April 2021 and March 2031, Horsham District Planning Framework, 2015)

schemes. Furthermore, the limited land supply of the borough makes on-site affordable housing delivery imperative, and viability claims suggesting this is slowing delivery will not automatically result in a reduction of the council's expectations for this to be provided.

## Key Housing Sites

12.44 New housing is considered integral to the creation of sustainable neighbourhoods in Crawley. The council will ensure that new housing opportunities are identified according to both land availability and the characteristics of individual neighbourhoods. This approach will respect the town's unique neighbourhood development and design principles and preserve the most valued of the town's environmental features such as open space and strategic landscaping.

### Policy H2: Key Housing Sites

The following sites are identified as key housing sites and allocated on the Local Plan Map. These are considered to be critical to the delivery of future housing in Crawley and are identified as being 'deliverable' within the first five years of the Plan (~~2024/25~~ **2023/24** – ~~2027/28~~ ~~2028/29~~) or 'developable' in years 6–~~17~~ **16** (~~2028/29~~ ~~2029/30~~ – 2039/40)<sup>110</sup>. To ensure the delivery of the overall minimum housing figure set out in Policy H1, as supported by the Housing Trajectory, indicative capacity figures for each site are shown in brackets below.

#### Deliverable

- Forge Wood Phase 4B, Pound Hill (434 dwellings)
- ~~Zurich House, East Park, Southgate (53 dwellings)~~
- Former TSB site, Russell Way, Three Bridges (59 dwellings)
- Upper Floors, 7 – 13 The Broadway & 1 - 3 Queens Square, Northgate (25 dwellings)
- Shaw House, Pegler Way, West Green (33 dwellings)
- Longley House, Southgate (121 dwellings)
- Land at Steers Lane, Forge Wood (185 dwellings) (subject to implementation of outline planning permission of CR/2018/0894/OUT, or any amendment thereof, and associated Reserved Matters approval(s))

#### Developable

- Land Adjacent to Sutherland House, Russell Way, Three Bridges (30 dwellings)
- Land adjacent to Desmond Anderson, Tilgate (205 dwellings)
- Land to the southeast of Heathy Farm, Balcombe Road, Forge Wood (188 dwellings)

#### Housing and Neighbourhood Facilities Site

- The Imperial, Broadfield Barton (developable), 19 dwellings. Development of this site must include a drinking establishment (A4 use) and two retail (A1 use) units.

#### Town Centre Key Opportunity Sites (1,500 net dwellings); comprising:

- Telford Place, Three Bridges (deliverable)
- Crawley Station and Car Parks (deliverable)
- County Buildings (developable)
- Land North of the Boulevard (deliverable)
- Crawley College (developable)
- Cross Keys (developable)

<sup>110</sup> Crawley Borough Council Housing Trajectory, 31 March 2023

- MOKA (developable)

#### Housing and Open Space Sites

- Tinsley Lane, Three Bridges (deliverable) 120 dwellings, mixed use recreation/residential. Development of this site must include, at least:
  - i. the replacement of Oakwood Football Club;
  - ii. senior 3G football pitch and facilities;
  - iii. a junior 3G football pitch;
  - iv. community use arrangements for the sports pitch facilities;
  - v. enhancement and management for public access of Summersvere Woods;
  - vi. on-site publicly accessible play space and amenity greenspace;
  - vii. the provision of allotments.

Development must also be carefully planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent safeguarded minerals site.

Full details of the requirements relating to this site are set out in the Tinsley Lane Development Brief.

- Breezehurst Drive Playing Fields, Bewbush (deliverable) 85 dwellings, mixed use recreation/residential. Development of this site must include:
  - i. the retention of good quality pitch provision to the south of the pavilion;
  - ii. provision of enhanced pitch drainage off-site;
  - iii. new or retained provision of changing facilities to be directed towards Skelmersdale Walk Playing Fields or other suitably located provision to meet future fluctuations in demand for pitch sports;
  - iv. the provision of allotments.

These requirements are set out in full in the Breezehurst Drive Playing Fields Development Brief.

#### Housing, Biodiversity and Heritage Site

- Land east of Balcombe Road/Street Hill, Pound Hill (deliverable) 15 dwellings. The design and layout of the development of this site must:
  - i. respect its setting outside the built up area and the rural character of the Worth Conservation Area;
  - ii. concentrate the residential element and associated infrastructure towards the least sensitive areas, where possible, and to be located within the southern section of the housing, biodiversity and heritage site;
  - iii. reflect, enhance and ensure no significant harm to the locally designated historic parkland;
  - iv. allow a suitable unbuilt margin around the archaeologically sensitive Moat;
  - v. avoid harm to the species-rich meadow grassland which contributes to the Local Wildlife Sites (LWS);
  - vi. maintain the woodland vegetation buffer between the development and the church, to retain the historic significance of the context of Worth Church; and
  - vii. be accompanied by a long-term commitment to the ecological enhancement and positive management of the remainder of the LWS (excluding the ponds and woodland in the centre and north-east in separate ownership) for the benefit of biodiversity.



Detailed and up-to-date ecological and archaeological assessments must be carried out. Where impacts cannot be avoided adequate mitigation and compensation measures will be provided to offset any harm caused to the site's important assets.

These requirements will be set out in full in a Development Brief.

#### Housing for Older People and those with Disabilities

- Oakhurst Grange, Southgate (deliverable) 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 (deliverable) as residential Class C3 use for older people (60 dwellings) and/or residential rooms as Class C2 (Residential Home) use.

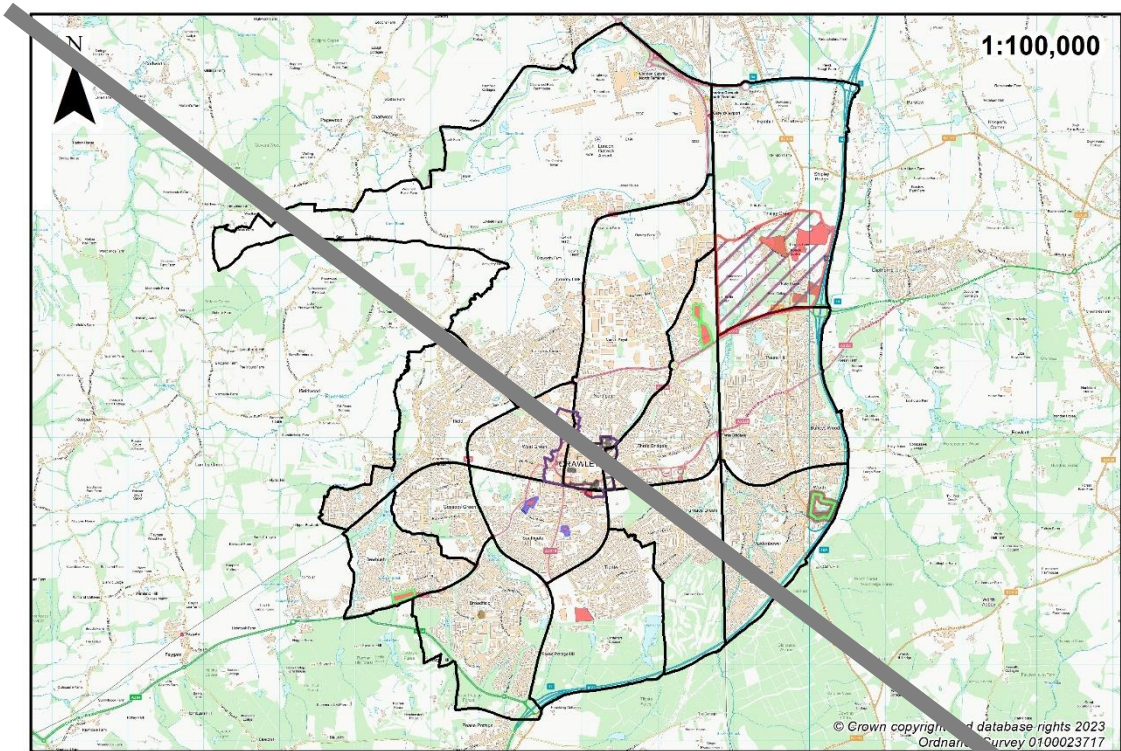
Development of each of these sites should specifically meet the needs of older people, either as a care facility in the form of Extra-Care or Residential Care or to provide general housing designed to meet particular needs of older people and those with disabilities, including being wheelchair adapted dwellings meeting Building Regulations Part M, Category 3 accessibility standards.










#### Broad Locations

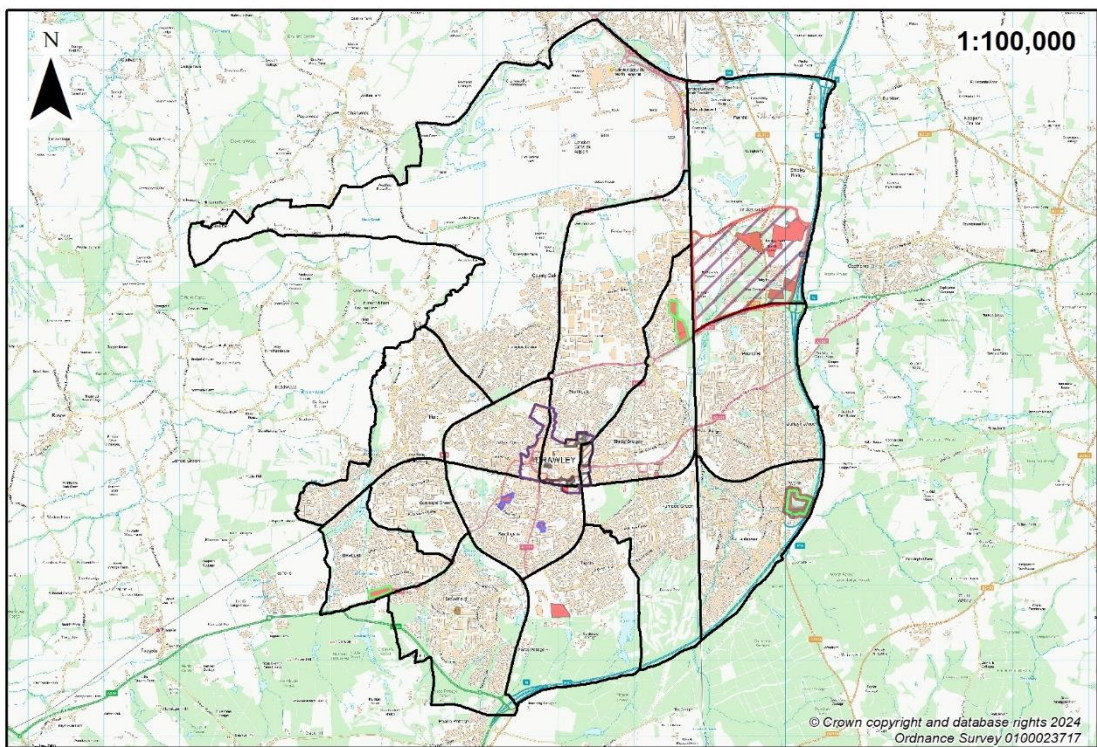
The remainder of the land within the Town Centre Boundary outside the identified Town Centre Key Opportunity Sites (above), and Land East of London Road, to the north of Crawley Avenue, Northgate, are identified as broad locations for housing development in years 6–~~17~~ ~~16~~, with the capacity to deliver indicative totals of 129 and 84 net dwellings respectively.










### **Reasoned Justification**

- 12.45 *This Policy demonstrates how the Local Plan makes provision for the delivery of a minimum of ~~5,330~~ ~~5,030~~ net additional dwellings in the borough between ~~2024~~ ~~2023~~ and 2040. This includes the 10% additional buffer required within the first five years of the Plan to ensure greater competition and choice in the supply of housing land. The council has undertaken a Strategic Housing Land Availability Assessment (SHLAA) which identifies land that has the potential for residential development in the borough. The results of the SHLAA are used to demonstrate an annual five-year housing land supply and to identify sites that are likely to come forward for residential development over the lifetime of the Local Plan.*
- 12.46 *Through the SHLAA process, the council has been able to identify a number of deliverable and developable sites to meet the housing target for the Local Plan period. In this regard, the council can demonstrate that it can satisfy the government's requirement to identify specific 'deliverable' sites to meet the first five years housing supply and specific 'developable' sites or broad locations for years 6–10 and 11–~~17~~ ~~16~~. It is considered that the additional 10% buffer requirement is capable of being delivered in the period ~~2024/25~~ ~~2023/24~~ – ~~2027/28~~ ~~2028/29~~.*
- 12.47 *Dwelling totals set out in Policy H2 are in most cases indicative figures which could potentially be exceeded subject to a policy compliant scheme being achieved. In the case of Land East of Street Hill the total given is a maximum based on the assessment of constraints. Where sites are identified as 'developable' this represents an assessment of likely development timescales. It does not represent a policy of phasing residential development, and such sites could potentially come forward in years 1 to 5 of the Local Plan.*



- |   |  |   |  |
|---|--|---|--|
|    | Forge Wood Neighbourhood (Policy H2)               |    | Housing and Community Facilities (Policy H2)                     |
|   | Key Housing Sites (Policy H2)                      |   | Housing and Open Space (Policy H2)                               |
|  | Indicative Key Housing Site (Policy H2)            |  | Housing for Older People and those with Disabilities (Policy H2) |
|  | Biodiversity and Heritage Enhancements (Policy H2) |  | Town Centre Key Opportunity Site (Policy TC3 and H2)             |
|   |  |  | Town Centre Boundary (Policy EC1, EC2, TC1-TC5 H2, H3c)          |



- |   |  |   |  |
|---|--|---|--|
|  | Forge Wood Neighbourhood (Policy H2)               |  | Housing and Community Facilities (Policy H2)                     |
|  | Key Housing Sites (Policy H2)                      |  | Housing and Open Space (Policy H2)                               |
|  | Indicative Key Housing Site (Policy H2)            |  | Housing for Older People and those with Disabilities (Policy H2) |
|  | Biodiversity and Heritage Enhancements (Policy H2) |  | Town Centre Key Opportunity Site (Policy TC3 and H2)             |
|   |  |  | Town Centre Boundary (Policy EC1, EC2, TC1-TC5 H2, H3c)          |

**Figure 23: Crawley Key Housing Sites**

## Forge Wood

- 12.48 *The Forge Wood Neighbourhood area identified on the Local Plan Map defines Crawley's new Forge Wood Neighbourhood. A large proportion of the Neighbourhood Area benefits from an outline permission and approved master plan for up to 1,900 new dwellings, a neighbourhood centre, employment land, social facilities, primary school and formal areas of open space and sports pitches. This development is currently being built out, with most phases under-way or already complete. A remaining total of 434 dwellings is anticipated by the Housing Trajectory to be delivered within the Plan period, to be complete by 2029/30. These are to be delivered as part of sub-phase 4B, for which reserved matters approval was still pending as of March 2023. This sub-phase area is retained as a housing allocation<sup>111</sup>.*
- 12.49 *A further developable housing site is identified outside the Master Plan area, at Heathy Farm (in the south-east corner of the allocation). The site is located close to Crawley Avenue (A2011), M23 and Junction 10. This site is formed of two parcels of land, which are joined by a woodland area. Much of the woodland area is ancient woodland. Therefore, this site is constrained by noise levels and an ecological buffer zone associated with the ancient woodland, which must be determined by the appropriate surveys. In addition, the site is also likely to need to incorporate on-site open space, including allotment provision, which should be designed into a scheme from the outset to ensure its satisfactory accommodation.*
- 12.50 *Land at Steers Lane forms a further site which has historically been identified as residual land for residential development at Forge Wood. Outline planning permission for up to 185 dwellings with supporting access, parking, landscaping and open space on this site was granted on appeal in February 2020 (CR/2018/0894/OUT), and reserved matters approval was granted in April 2021 (CR/2020/0548/ARM). This provides a basis for the bringing forward of the site, which commenced development in late 2021. It is noted that this application was assessed against the 2015 Local Plan, and any review of the principle of the acceptability of the site through a further planning application would need to be considered against the policies in this plan, including Policy EP4: Development and Noise.*
- 12.51 *Beyond this, there may be opportunities within the Neighbourhood area to consider further smaller-scale housing development, as infill opportunities, subject to considerations of infrastructure capacity, open space and amenity requirements, biodiversity and ancient woodland, and the requirements of Policy EP4 relating to noise affected areas. Development of residential uses in land affected by the noise contours<sup>112</sup> above 60dB would not be in accordance with Policy EP4 and would be refused.*

## Town Centre Housing Sites

- 12.52 *A number of sites within the Town Centre boundary have been identified as Key Opportunity Sites in Policy H2 and TC3. These sites have the capacity to deliver a minimum of 1,500 net dwellings cumulatively through mixed-use main town centre uses and residential development. Proposals for mixed-use (including non-residential) development on these sites will be considered favourably providing they can demonstrate the delivery of wider vitality and viability benefits to the Town Centre, and that their development would not undermine the delivery of a minimum of 1,500 net dwellings in the period 2021/22 to 2039/40 and support delivery of the overall minimum*

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<sup>111</sup> As of March 2023, there was a residual 540 dwellings remaining from the Outline Planning Permission. However, a lower figure of 477 dwellings is set out in the Housing Trajectory reflecting actual anticipated delivery through refined design (43 in Phase 1B in 2023/24; 434 in Phase 4B after April 2024).

<sup>112</sup> As associated with an additional runway to the south of Gatwick Airport unless otherwise determined.

housing figure set out in Policy H1 (in accordance with Policy TC3). The council's delivery against these targets will be subject to ongoing monitoring and identified in the Authority's Monitoring Report. Residential proposals coming forward within the Town Centre boundary must also adhere to the location-specific requirements set out in Policies TC4: Active Frontages and H3d: Housing Typologies Town Centre Residential Sites, in addition to satisfying the other general policies in the Plan.

#### Housing and Open Space Sites

12.53 In determining how far Crawley can meet its own housing needs, detailed assessments have been carried out to ensure the town balances competing land uses in a sustainable manner. This includes landscape character assessments, open space and economic growth assessments alongside the Urban Capacity Study and Strategic Housing Land Availability Assessments. Two sites have been identified and allocated on the Local Plan Map for 'Housing and Open Space'. These are Tinsley Lane, Three Bridges (Deliverable) and Breezehurst Drive, Bewbush (Deliverable). The layout of these sites has been considered in more detail to ensure they can deliver the quantum of housing within the constraints identified by the open space study for meeting recreational open space needs<sup>113</sup>. A development brief has been prepared for both sites to ensure their development adheres to the requirements of the Open Space, Sport and Recreation Study and Playing Pitch Study (2014); critical elements of these are set out in the Policy<sup>114</sup>. *For Tinsley Lane this will involve consideration into the needs of the football club.*

12.54 Tinsley Lane is located in close proximity to Crawley Goods Yard which is a safeguarded minerals site. Development must be carefully planned, laid out and designed to minimise potential future conflicts and constraints on its important minerals function.

#### Housing, Biodiversity and Heritage Site

12.55 Land east of Balcombe Road/Street Hill has a number of heritage and environmental constraints which must be carefully considered and addressed through the design and layout of a development scheme. These include (but are not limited to):

- i. Forming part of the historic countryside setting of the Grade I listed Church;
- ii. Its allocation within the Worth Conservation Area;
- iii. Its Local Wildlife Site designation (with species-rich meadow grassland as its important ecological attribute);
- iv. Containing an archaeological sensitive asset: the Moat;
- v. Forming part of an Historic Park and Garden;
- vi. Being located outside the Built-Up Area Boundary of the town.

12.56 To ensure an appropriate balance between the need for housing and the important heritage and environmental assets and characteristics of the site, a maximum capacity of 15 dwellings is considered likely to be appropriate, subject to careful layout and design which clearly addresses the constraints associated with the site, including those covered by other policies in this Local Plan and national legislation and policy, and which result in a high quality, sensitive scheme. The maximum capacity figure should not be considered a "target" at the expense of meeting policy and design expectations.

12.57 Harm to the character of the Worth Conservation Area must be minimised by a scale and design of development which respects the rural nature of the Conservation Area, as a loose-knit low density layout clearly distinct from the suburban character of

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<sup>113</sup> In accordance with paragraphs 98 and 99 of National Planning Policy Framework (2021) MHCLG

<sup>114</sup> [Breezehurst Drive Playing Fields Development Brief \(June 2018\).pdf](#) and [Tinsley Lane Development Brief \(April 2017\).pdf](#)

*Maidenbower. The potential impact of the development and long-term degradation of the valuable habitat on the site and the harm to the Moat can be mitigated against through the appropriate high quality enhancement of the remainder of the site. Therefore, an unbuilt margin around the archaeological asset and its appropriate management must be retained and an appropriate scheme for its future management, and that of the two-thirds of the LWS not affected by development and controlled by the landowner, will be required as part of the development. To protect the valuable nature of the site, measures must be incorporated within the development, and management proposals, to control the pressures created from the development on the remaining ecological assets, including informal recreation, dog walking and fly tipping.*

- 12.58 *Due to the complex character and assets associated with this site, it is shown on the Local Plan Map as a housing, biodiversity and heritage site, with the area most likely to be suitable for housing indicated within the southern part of the site.*

#### Housing for Older People and those with Disabilities Sites

- 12.59 *It can be difficult for developers of specialist housing for older people to compete with other developers for land, particularly in a land constrained borough such as Crawley. To support the delivery of specialist accommodation, and to seek to provide a greater number of affordable units within the borough in order to meet the growing needs of the aging population, the Local Plan has allocated two sites for specialist housing for older persons and/or Extra Care Housing for all ages.*
- 12.60 *Oakhurst Grange is a vacant site formerly occupied by a residential care facility. As a secluded and discrete site, the particular characteristics of the site and its location in close proximity to Crawley Hospital support its continued contribution towards meeting the local housing needs of older people. Appropriate development of this site could be as an Extra-Care or Residential Care facility; or as a bespoke development which may incorporate mixed units designed to meet the needs of older people; or for housing designed to provide more general accommodation for older people, and to contribute to the overarching principle of places to live that assist older people to retain their independence for as long as possible. This may include: accessible mainstream housing such as bungalows and step-free apartments designed and built to wheelchair adaptable access standards; sheltered or extra care housing; and/or retirement housing.*
- 12.61 *The existing St. Catherine's Hospice site is to become vacant following the move to a new facility in Pease Pottage. This site offers the council and St. Catherine's Hospice the opportunity to identify a further site for older people's housing and/or residential care home. The site's location and constraints including its size, changes in levels and location adjacent to a Conservation Area make it particularly appropriate for this type of housing.*

#### Broad Location Housing Sites

- 12.62 *Given that the council is required to identify 16 years housing supply, it is considered that there is additional housing potential in the Town Centre and Land East of London Road to the north of Crawley Avenue that will arise in the mid to latter part of the Plan period. These could contribute to housing land supply from Year 6 onwards (i.e. from 2029/30 to 2039/40) and are identified as broad locations for medium to long-term residential development. This is in accordance with the overall spatial approach as set out in the Local Plan Vision to 2040, by helping to minimise the impact on important biodiversity and landscape features and offers the greatest scope to reduce the need to travel by private vehicle because of the proximity to existing services, jobs and public transport.*

## Housing Typologies

12.63 In order to support Local Plan Policy H1 and seeking to maximise the delivery of new dwellings to meet as far as possible Crawley’s emerging housing needs, the following land typologies have been identified for their potential suitability for housing development:

- Estate Regeneration;
- Densification;
- Infill opportunities;
- Small sites;
- Town centre;
- Upward extensions;
- Conversions from commercial/non-residential uses;
- Open spaces;
- Garden sites;
- Urban Extensions on/outside the borough boundaries (covered in paragraphs 2.30-2.33 and 12.17-12.23, along with Policy CL8, above).

### Policy H3: Housing Typologies

Housing development in Crawley will be supported where it meets the following criteria, along with the specific requirements set out associated with each of the housing typology sub-policies below (H3a-H3f inclusive):

- i. The principles of Good Urban Design are followed;
- ii. The principles in relation to Local Character and Design are followed;
- iii. The presumption in favour of sustainable land use is followed;
- iv. Local Design Standards and wider borough standards in relation to landscape and urban form are followed;
- v. A good standard of amenity for all existing and future occupants of land and buildings is provided or retained, including maintaining privacy and preventing overlooking; and avoiding dominance or overshadowing.
- vi. The scheme would not result in an unacceptable impact on car parking for existing and new residents and occupiers.
- vii. The scheme meets the internal and external space standards expected by the Local Plan, including being accessible and adaptable, and proposals ensure that rooms within buildings receive adequate daylight.

### Reasoned Justification

12.64 *The Plan’s windfall allowance recognises that opportunities exist within the borough for residential schemes to come forward on sites not currently identified in the Housing Trajectory and, therefore, unable to be allocated in Policy H2. To provide a positive and pro-active planning approach, Policies H3 and sub-Policies H3a-f offer the planning policy framework for such proposals to be considered against in relation to their location and land typology.*

12.65 *Where residential development is proposed outside of the Built-Up Area Boundary, it must address the general requirements set out in Policy CL8, as well as those which relate to the character area or edge in which the site is located.*

## Estate Regeneration

- 12.66 In Crawley, due to the planned Twentieth Century New Town history, a significant proportion of housing was provided at a similar time, between the 1950s and 1990s. This may mean that opportunities for estate regeneration could arise as part of the promotion of improvements to housing stock, particularly where the construction methods of certain types of properties are causing maintenance problems or have poor energy efficiency. It can be a successful way to improve the quality of housing and increase numbers in an area whilst at the same time improving the local environment, but is also potentially disruptive to existing residents. Therefore, this would need careful planning. Local Authorities are encouraged by the NPPF<sup>115</sup> to consider the social, economic and environmental (including improved sustainability) benefits of estate regeneration.
- 12.67 At this stage, there are no estate regeneration projects planned in Crawley. Should this approach be progressed ahead of the next Local Plan Review, there are a number of specific planning policy considerations to be taken into account in early scoping and design.

### Policy H3a: Estate Regeneration

Housing development as part of Estate Regeneration will be supported where this is in conformity with the other policies and requirements of this Local Plan, and where it can be shown that:

- i. The proposals are supported by, and in conformity with, an agreed comprehensive Masterplan for the new and remaining areas, including detailed phasing and relocation proposals;
- ii. The proposals will provide high quality new development in keeping with the character of the neighbourhood, maximising the efficient use of land whilst protecting residential amenity and providing appropriate open space;
- iii. Local communities and affected individuals have been engaged extensively, positively and with genuine opportunities to participate and are supportive of the proposals.

### Reasoned Justification

- 12.68 *The policy is consistent with the requirement in the National Planning Policy Framework that planning policies ‘should consider the social, economic and environmental benefits of estate regeneration’ and that ‘Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard’<sup>116</sup>.*

### Densification, Infill Opportunities and Small Sites

- 12.69 Within the urban neighbourhoods, opportunities for densification through infill and small sites may arise as part of the windfall housing delivery anticipated through the Housing Trajectory. The Policy below sets some general principles which should be considered alongside any Area-Wide Character and Design Assessments and local design standards associated with the location of any proposals.

<sup>115</sup> National Planning Policy Framework, paragraph 94 (2021) MHCLG

<sup>116</sup> National Planning Policy Framework, paragraph 94 (2021) MHCLG

### **Policy H3b: Densification, Infill Opportunities and Small Sites**

Densification and development on infill and small sites in Crawley will be supported where it meets the criteria set out in Policy H3, and Policy CL2, along with the specific requirements set out below, and where it is in conformity with the other policies and requirements of this Local Plan.

#### **Densification**

Housing development through densification schemes will be supported where it can be shown that:

- i. The site is located in a sustainable location which would be appropriate for higher densities, such as close to transport interchanges, town centre and neighbourhood centres, as outlined in detail in Policies CL2 – CL4.

For large developments, with moderate to high density ranges, applicants are particularly encouraged to deliver residential schemes which meet the amenity standards outlined in Policy DD3, section i to v.

#### **Small Sites**

Housing development on small urban sites will be supported where it can be shown that:

- ii. It would not unduly restrict the development potential of adjoining land, nor prejudice the proper planning and phasing of development over a wider area;
- iii. It maximises the potential capacity of the site, taking on board the character of the site and its context, and uses the land efficiently, through a careful and high quality design-led approach appropriate to the character of the neighbourhood;
- iv. It is based on a thorough understanding of the immediate and wider context and is designed to respond to and enhance the existing character.

#### **Infill Opportunities**

Housing development through infill opportunities will be supported where it can be shown that:

- v. It maximises the potential capacity of the site, taking on board the character of the site and its context, and uses the land efficiently, through a careful and high quality design-led approach;
- vi. It is based on a thorough understanding of the immediate and wider context and is designed to respond to and enhance the existing character.

#### **Reasoned Justification**

12.70 *National planning guidance requires Local Planning Authorities to support development that makes efficient use of land. However, impacts on character and the importance of securing well-designed, attractive and healthy places must be considered<sup>117</sup>.*

#### **Town Centre Residential Sites**

12.71 The Town Centre represents a highly sustainable location for residential development with immediate access to facilities, services, and transport links and residential development is increasing. It adds vitality to the Town Centre, bringing life into the centre and supporting the evening economy. Therefore, housing development is encouraged in the Town Centre, either as mixed use or wholly residential schemes (where agreed) or as conversions of the upper floors of existing retail premises,

<sup>117</sup> National Planning Policy Framework, paragraph 124 d) and e) (2021) MHCLG



particularly where these bring forward balanced tenures and owner-occupation in the Town Centre.

- 12.72 However, this must be balanced with the need to maintain sufficient floorspace for retail, commercial and social facilities and services which should be provided in a central location. In addition, the needs of the residential population must be adequately catered for, through sufficient infrastructure provision. Residential proposals within the Town Centre must comply with the policies set out in the Crawley Town Centre Chapter (Policies TC1 – TC4) and respect the Conservation Areas within and adjacent to the Town Centre.

### **Policy H3c: Town Centre Sites**

Housing development in Crawley Town Centre, except at ground floor level within the Primary Shopping Area (Policy TC1) will be supported where it meets the criteria set out in H3, along with the specific requirements set out below, and where it is in conformity with the other policies and requirements of this Local Plan:

- i. It would not result in a net loss of employment or retail land or floorspace unless it otherwise clearly meets the full requirements of Policy EC2;
- ii. The scheme should provide active frontages on the ground floor level in accordance with Policy TC4;
- iii. The scheme should achieve the correct housing mix for the Town Centre, as set out in Policy H4, particularly preventing an over-supply of small dwellings, and should create a balance in tenure, including through encouraging owner-occupation, encouraging affordable tenures, and monitoring the ratio of private rented accommodation;
- iv. The development will be designed to be integrated effectively with existing businesses and community facilities and to adequately address existing and potential noise and nuisance arising from the mix of town centre uses through suitable mitigation before the development is occupied;
- v. Cumulative infrastructure needs of the increasing residential population in the Town Centre are clearly identified and met, and the proposal has been justified and is adequately supported by sufficient social facilities and infrastructure located within the Town Centre or accessible from the development;
- vi. Where a lower car parking provision is anticipated, alternative transport proposals must be justified, agreed and implemented;
- vii. It maximises the potential capacity of the site and uses the land efficiently, through a careful and high quality design-led approach;
- viii. Cycle parking and waste/recycling storage must be adequately designed into the scheme from the start and the site will meet the requirements necessary for access, circulation and manoeuvring, loading and unloading and the collection of waste/recycling, including the servicing requirements of existing and new commercial and retail floorspace.

#### ***Reasoned Justification***

- 12.73 *Policies contained within the Town Centre chapter are particularly relevant when considering residential opportunities within the Town Centre Boundary. In addition, Policies CL3 and CL4 set out policy expectations in relation to the effective use of land.*

*The Urban Design and Town Centre SPDs also provide additional supporting guidance which should be considered when preparing schemes.*

12.74 *Policy H4 sets out the expected future housing mix from developments across the borough. However, it is recognised that the Town Centre provides a different offer to the overall requirements. Notwithstanding this, evidence<sup>118</sup> has identified concerns regarding the over-provision of smaller bedsit and one bed units coming forward in Town Centre schemes leading to a distorted market without sufficient provision of family-sized units. As the Town Centre residential population grows, it is essential to cater for a better mix of communities to also cater for small families (two-bed units) as well as larger families (three- and four-bed units). On this basis, schemes within the Town Centre Boundary should seek to meet the Town Centre housing mix. Justification will be required for a housing mix which significantly differs from that modelled. Schemes which provide only the small units will not be considered acceptable on the basis of arguments which do not accept a need for a mix of units in Town Centre.*

### **Upward Extensions**

12.75 National policy encourages Local Planning Authorities to support opportunities to use the airspace above existing residential and commercial premises for new homes, where these would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, are well designed, and can maintain safe access and egress for occupiers. Certain upward extensions are now permitted development but, as much of Crawley lies within 3km of an aerodrome, many will still require planning permission.

#### **Policy H3d: Upward Extensions**

Housing development through upward extensions will be supported where it meets the criteria set out in Policy H3 and is in conformity with the other policies and requirements of this Local Plan, and where it can be shown that:

- i. The proposed height, including construction cranes, has been agreed with Gatwick Airport Ltd in relation to aerodrome safeguarding and NATS En Route LTD in relation to technical sites safeguarding;
- ii. It is based on a thorough understanding of the immediate and wider context and is designed to respond to and enhance the existing character, and take into consideration the expectations set out in Policy CL2;
- iii. It would not unduly restrict the development potential of adjoining land, nor prejudice the proper planning and phasing of development over a wider area;
- iv. It would not cause unreasonable harm to the amenity of the surrounding area by way of overshadowing, dominance or overlooking;
- v. Where a lower car parking provision is anticipated, alternative transport proposals are justified, agreed and implemented;
- vi. The development will be designed to be integrated effectively with existing businesses and community facilities and adequately address existing and potential noise and nuisance arising from the adjoining uses through suitable mitigation before the development is occupied;

<sup>118</sup> Market Housing Mix, paragraphs 5.17-5.19, page 47 (November 2016) Chilmark Consulting: <https://crawley.gov.uk/sites/default/files/documents/PUB311637.pdf> and the Strategic Housing Market Assessment (November 2019) Icenil Projects: <https://crawley.gov.uk/sites/default/files/documents/PUB354604.pdf>

- vii. Cycle parking and waste/recycling storage are adequately designed into the scheme from the start and the site will meet the requirements necessary for access, circulation and manoeuvring, loading and unloading and the collection of waste/recycling.

### **Reasoned Justification**

- 12.76 *Crawley neighbourhoods are predominantly characterised by low-rise, domestic scale developments, of two and sometimes three-storeys. In such cases, clear guidance will be provided by the Area-Wide Design Assessments. For Crawley Town Centre there may be more scope for upward extensions, although this must be well-designed particularly in The Queens Square and The Broadway Conservation Area.*
- 12.77 *For any developments proposing an increase in height, liaison with Gatwick Airport Limited, with respect to Aerodrome Safeguarding (see Policy DD5) will be essential at an early stage. This will include consideration of height of cranes and construction.*

### **Conversions from Commercial/Non-Residential Uses**

- 12.78 National planning policy encourages the conversion of commercial properties, especially vacant or underused buildings, to residential. Commercial properties within Crawley's Main Employment Areas are not considered suitable for residential, due to the need for employment floorspace and the impacts of residential developments on commercial operations in such locations. However, the Town Centre may provide opportunities for some conversions to residential where this has been considered against the Policy requirements of EC1 and EC2.

#### **Policy H3e: Conversions from Commercial/Non-Residential Uses**

Housing development through conversion of existing buildings from non-residential uses will be supported where it meets the criteria set out in Policy H3 and is in conformity with the other policies and requirements of this Local Plan, and where it can be shown that:

- i. It would not result in a net loss of employment or retail land or floorspace, unless it clearly meets the requirements of Policy EC2;
- ii. Where this is located adjacent to one of the borough's Main Employment Areas, the scheme would not result in an adverse impact on the economic role or function of the Main Employment Area, and the wider economic function of Crawley;
- iii. Where this is located within one of the borough's Neighbourhood Parades, the scheme would not adversely affect the ability of the Neighbourhood Parade to cater for the day-to-day needs of local residents;
- iv. The scheme provides active frontages at ground floor level, where the site is within the town centre or appropriate other locations;
- v. The development will be designed to be integrated effectively with existing businesses and community facilities and adequately address existing and potential noise and nuisance arising from the mix of uses through suitable mitigation before the development is occupied;
- vi. Cycle parking and waste/recycling storage will be adequately designed into the scheme from the start and the site will meet the requirements necessary for access, circulation and manoeuvring, loading and unloading and the collection of waste/recycling. Where a lower car parking provision is anticipated, alternative proposals must be justified, agreed and implemented;

- vii. It maximises the potential capacity of the site and uses the land efficiently, through a careful and high quality design-led approach;
- viii. It is based on a thorough understanding of the immediate and wider context and is designed to respond to and enhance the existing character.

### **Reasoned Justification**

12.79 *Conversions can increase the supply of residential properties but it is important to ensure no conflicts arise by introducing a residential population into a commercial area. Policies in the Economic Growth and Crawley Town Centre chapters apply.*

### **Open Spaces**

12.80 Where open space can be shown to be surplus to open space requirements or sufficient alternative new provision is to be provided, in accordance with Policy OS1, the following specific criteria must be satisfied in considering new housing development on existing open space sites (including residential garden sites). Where an improvement on quality, usage and surveillance would be achieved through design and layout of new development this will be positively considered.

### **Policy H3f: Open Spaces**

Housing development on surplus open spaces within the Built-Up Area Boundary in Crawley will be supported where it meets the criteria in Policy H3, along with the specific requirements set out below, and where it is in conformity with the other policies and requirements of this Local Plan.

#### **Open Spaces**

Housing development on open spaces will be supported where it can be shown that:

- i. The site has been shown to be surplus to requirements for open space needs through the Open Space, Sport and Recreation Study or otherwise clearly meets the requirements established by Policy OS1;
- ii. Replacement and/or enhancement of open space is provided elsewhere in a suitable location to mitigate against the loss of the open space and to address the increased demand arising from the associated new population;
- iii. The urban and landscape character and environmental values of the site are outweighed by the benefits of the development and any harm mitigated and addressed, with an enhancement, through design and layout;
- iv. Mitigation measures would ensure that the scheme would not block or harm the strategic Green Infrastructure network and would be designed to provide new links to Green Infrastructure where possible and clearly result in Net Gain for biodiversity (based on up-to-date and professional ecological and arboricultural surveys);
- v. Flood risk will not be exacerbated elsewhere as a result of the development, and surface water drainage is maintained at greenfield runoff rate levels, as a minimum.

#### **Garden Sites**

Housing development on garden sites will be supported where it can be shown that:

- vi. It is based on a thorough understanding of the immediate and wider context and is designed to respond to and enhance the existing character;
- vii. Ancient woodland or aged trees would not be damaged or lost and an appropriate buffer is provided between any such trees and the edge of the development's

construction. Any TPO protected trees should be retained where possible and measures to avoid damage and root compaction should be implemented.

**Reasoned Justification**

12.81 *Policies set out in the Wellbeing and Communities (Character, Landscape and Development Form; Design and Development Requirements; and Open Space, Sport and Recreation) and Environmental Sustainability (Green Infrastructure and Biodiversity and Environmental Protection) Sections are particularly relevant when considering applications in relation to housing on existing open space sites. In relation to flooding, Policy EP1 will apply to development of open spaces. Wherever possible, further reduction of surface water runoff beyond the greenfield runoff rate levels, and additional storage introduced as part of any development proposal, should be sought in order to offer a greater reduction in runoff rates from new development.*

## Meeting Housing Needs

- 13.1 Crawley provides a critical role in the Northern West Sussex Housing Market Area (comprising Crawley Borough, Horsham and Mid Sussex Districts and a small part of Reigate and Banstead Borough) offering a substantial stock of affordable, well-designed, family accommodation. In comparison to the other districts within the Housing Market Area, Crawley has a housing mix skewed towards smaller and cheaper housing, but with a high proportion of three-bedroom terrace properties built as a key component of the New Town housing stock. It also has higher levels of social tenure accommodation, made available to those unable to access private housing (rental or purchase), in contrast to other parts of the Housing Market Area.

### Chapter Content

- 13.2 This chapter establishes the policies to secure the appropriate type and mix of residential development within the borough to meet the needs of specific groups in the community and sets policies to support the delivery of the types of housing needed within the borough.

### The Key Issues

#### Existing Housing:

- 13.3 There are approximately 46,000 dwellings in Crawley. 60% of the town's housing is owner-occupied with 24% being affordable properties (social rent or affordable rent or part ownership). The number of people living in privately rented accommodation has increased significantly, and accounted for over 15% of households in 2011 compared with 6% in 2001. Almost 97% of the affordable housing stock is rented, with the remainder being part-owned (shared-ownership or shared-equity). Terraced housing makes up the largest share of the stock (42%), with the rest comprising flats (23%), semi-detached (21%) and detached housing (14%).
- 13.4 Overall, the housing stock appears well suited to younger working people (single households and those with young families) seeking to enter the housing market, but the supply of larger housing and high-end market housing is more limited.

#### Northern West Sussex Strategic Housing Market Assessment:

- 13.5 The Northern West Sussex Strategic Housing Market Assessment (SHMA) has been updated (2019). The updated study takes into account the latest data (including the Standard Method for calculating housing needs) and the latest national policy in relation to Crawley borough and Horsham district. It has assessed local housing needs and identifies the needs of particular groups within the population including:
- Those who require affordable housing;
  - Families with children;
  - Older people;
  - Students;
  - People with disabilities;
  - Service families;
  - People who rent their homes; and
  - People wishing to commission or build their own homes.

Key messages and detailed evidence from this study have been taken on board through the policies in this Plan. The need for specialist housing for older people is covered in

paragraphs 12.24-12.32 above, along with specific allocations in Policy H2: Key Housing Sites (Housing for Older People) and supporting text in 12.60-12.62.

### **Gypsy, Traveller and Travelling Showpeople:**

- 13.6 The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (~~2013~~ 2023) identified a need to find a reserve site suitable for accommodating ten Gypsy and Traveller pitches to meet potential accommodation needs arising from the existing community currently living within Crawley over the whole Plan period.
- 13.7 The assessment identified approximately 30 Gypsy, Traveller and Travelling Showpeople households living within Crawley; with 77 confirmed that 103 individuals identified identifying themselves as a 'White Gypsy or Irish Traveller' within the 2021 2011 Census. In addition, 337 individuals identified themselves as 'White Roma'. The Census 2021 data suggests that 13 households within Crawley reside within a caravan or other mobile or temporary structure accommodation type. This includes six Gypsy and Traveller households residing on three private sites in caravan accommodation, and three Travelling Showpeople households sharing a single site within the borough.
- 13.8 The surveys carried out in 2023 as part of the Assessment, highlighted ~~completed questionnaires identified a demand for pitches, particularly through:~~
- ~~• the aspiration for Gypsy and Traveller children to live on a pitch;~~
  - ~~• desire to move out of their current bricks and mortar accommodation owing to preference; and~~
  - ~~• the anticipation of new family formations expected to arise from the existing households within Crawley.~~
  - A preference to stay on small privately-owned, family-sized sites, suitable for multi-generational occupation on individual pitches.
  - A strong preference to remain in caravan accommodation and maintain a travelling lifestyle.
  - A desire to retain stability for the younger generation to attend school and college.
  - A desire to remain in Crawley.
  - Impacts on health from uncertainty, instability and negative reactions towards them.
  - No additional households required new pitch sites.
- 13.9 It ~~is considered~~ was concluded, in the original Accommodation Needs Assessment undertaken in 2013/14, that none of the participants in bricks and mortar accommodation demonstrated an immediate 'need' in terms of having a proven psychological aversion to bricks and mortar accommodation. It was not possible to revisit Traveller families within bricks and mortar for the 2023 Accommodation Needs Assessment update. However, the evidence suggests that the demand for sites from the existing population was over-estimated in the 2014 Assessment. Instead, the need has arisen from Traveller families moving into the borough from outside the county, from publicly run sites to take up private family-sized sites. Therefore, from the data review and surveys carried out there is no conclusive evidence which suggests there is an immediate need for a new publicly owned pitch site within the borough. However, when taking potential future growth from the Traveller families within Crawley and in light of the location of the private sites within the borough being located on land safeguarded for potential future airport runway expansion to the south, and affected by airport noise, there is considered to be ~~a growth rate of 3% has been applied to the number of households currently living within Crawley for the purposes of estimating the potential future need which may arise~~

~~from the current population over the Plan period (beyond the first five years). This resulted in a Local Plan need for a reserve site suitable for accommodating up to ten Gypsy and Traveller pitches. This Accommodation Needs Assessment was reviewed in 2020 with the same conclusion being reached, and the same findings are emerging from the current 2023 review.~~

~~13.10 None of the surveyed Gypsy and Travellers indicated that they owned land which they wished to be considered for a Gypsy and Traveller site.~~

13.10 The borough is heavily constrained by its administrative boundaries, which in most parts of the borough do not extend significantly beyond the Built-Up Area. The presence of Gatwick Airport also renders a significant amount of land in the north of the borough unsuitable for residential development (particularly Gypsy and Traveller accommodation) due to noise constraints; and other areas of land are constrained by flood risk. These factors limit the opportunities for providing a suitable site for permanent caravan accommodation but a location for a possible reserve site has been identified.

## Local Plan Policies

### Future Housing Mix

13.12 Different households require different types and sizes of housing. It is important that an appropriate choice and mix of housing is provided across the borough in order to create balanced and sustainable communities. Widening housing choice broadens the appeal of an area and assists in meeting the needs of existing residents as well as attracting new residents to the borough. The council's Strategic Housing Market Assessment (SHMA) and its updates, provides the baseline evidence against which housing mix should be considered.

#### Strategic Policy H4: Future Housing Mix

All housing development should provide a mix of dwelling types and sizes to address the nature of local housing needs and market demand. The appropriate mix of house types and sizes for each site will depend upon the size and characteristics of the site and the viability of the scheme. However, consideration should be given to the evidence established in the Strategic Housing Market Assessment and its updates for market housing needs and demand in Crawley.

In delivering the affordable housing element of residential schemes, in line with Policy H5, the need for one, two and three bedroom affordable dwellings in Crawley, as identified in the council's Strategic Housing Market Assessment and its updates, should be addressed in meeting the housing needs of those considered to be in greatest need. These should include smaller dwellings designed to meet the needs of families.

The expected starting point for the market housing mix, both for schemes of owner occupation and private market rent, and the affordable housing mix is set out in the table below. Applications should explain how they have sought to meet this mix (or any subsequent delivery-adjusted update published with the council's Authority Monitoring Report) and provide strong justification for schemes which fail to provide a reasonable balance of property types and sizes, to promote mixed communities.

Housing Mix Test:

In order to avoid an excessively distorted dwelling mix, major residential developments will be required to meet the following test:



- Step 1: where applicable, divide the scheme into separate tenures.
- Step 2: for each tenure exceeding 4 units within the development, identify the ‘median’ size of unit on a notional development of equivalent tenure, scale and location whose mix matches that stated in the table below or any subsequent delivery-adjusted position published in the council’s Authority Monitoring Report.
- Step 3: compare the notional median to the proposed scheme and ensure that neither the proportion of units smaller, nor the proportion of units larger than the notional median, exceeds 90%.

### Reasoned Justification

13.13<sup>2</sup> Ensuring that new housing takes account of local need to create neighbourhoods where there is genuine choice of the right housing in terms of size, type, tenure, and affordability, both at neighbourhood and borough wide level, is essential. Therefore, the council will encourage a mix of housing that will be appropriate to the needs of the community taking account of the information within the SHMA and its updates, to provide a range of types, sizes, tenures and affordability including housing for the elderly, lifetime homes and other specialist housing needs.

13.14<sup>3</sup> The recommended mix across all priority bandings and affordable tenures, and private ownership and private rent is set out below:

	Market Housing Element (Private Sale and Private Rent)		Affordable Housing Element (Intermediate and Rental Tenure)
	Town Centre	Borough-Wide	
1 Bed	25% - 30%	10%	25% - 30%
2 Bed	40% - 45%	25%	30% - 35%
3 Bed	25%	40%	25% - 30%
4+ Bed	5%	25%	5% - 10%

13.15<sup>4</sup> The council will expect new residential schemes to reflect the latest evidence of need, subject to density and character considerations. For larger developments, in particular, clear justification will be expected to support a proposed housing mix which significantly differs from that modelled in the SHMA and shown in the table above, or as updated through monitoring as part of the Authority’s Monitoring Report.

13.16<sup>5</sup> Town Centre mixed use developments will be expected to be built at higher densities whilst including family accommodation, in accordance with Policy H3c. However, this may not necessarily be suitable for all sites.

13.17<sup>6</sup> In meeting the appropriate housing mix, the design and layout of buildings and the expected standards for residents must be considered in parallel at the earliest design stage, to ensure viability and suitability of a scheme. Policy DD2 establishes the need for all new development to be designed inclusively, including for residential units to demonstrate they are able to meet Building Regulations Part M Category 2<sup>119</sup> and Policy DD3 identifies the required internal space standards for all new dwellings. Further guidance, including for external space, is provided in the Urban Design SPD.

13.18<sup>7</sup> The council will particularly seek to achieve a mix of dwelling sizes to meet local affordable housing need. The 2019 SHMA has found that the demand for new homes for those in local affordable housing need is reasonably evenly split between one-bedroom, two-bedroom and three-bedroom units. However, this does not justify under-provision

<sup>119</sup> Approved Document M: access to and use of buildings, volume 1: dwellings (2016) MHCLG  
<https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m>

of the family-sized accommodation, including the provision of smaller two-bedroom houses, in appropriate schemes.

## Affordable Housing

13.198 All Local Plans are required by the NPPF to make provision for meeting affordable housing needs in their area. Failure to address affordable housing needs would have detrimental implications on the economic and social health of the town. Therefore, it is important to secure an appropriate mix of housing types and tenures within developments that come forward over the Plan period.

### Strategic Policy H5: Affordable Housing

~~40%~~ An affordable housing contribution will be required from all residential developments, 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 where on-site provision is the default expectation while off-site contributions in lieu may be considered in exceptional circumstances.~~

#### Outside the Town Centre

~~On C3 developments, 40% affordable housing will be sought where~~ 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.

~~On C2 developments outside the Town Centre, the value of the developer's contribution will be determined by using the Borough-Wide Commuted Sums Calculator, applying the scheme's Net Sale Area (NSA) to account for the gross-net ratio of care schemes.~~

~~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.~~

#### Within Crawley Town Centre

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. ~~The Town Centre Commuted Sums Calculator will be applied in determining the value of the developer's on-site contribution on C2 developments, and/or off-site commuted payments for both C2 and C3 developments where exceptional circumstances apply. In the case of C2 developments, the scheme's Net Sale Area (NSA) will be used to account for the gross-net ratio of care schemes.~~

~~On C3 developments,~~ 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.

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.

### Sites of 10 dwellings or less

For sites of 10 dwellings or less (whether C2 or C3), a commuted sum towards off-site affordable housing provision will be sought, using the Borough-Wide or the Town Centre Commuted Sum Calculator according to the location of the site, unless on-site provision is preferred, with the on-site tenure mix to be agreed as appropriate. For C2 schemes the relevant Commuted Sum Calculator inputs will be based on Net Sale Area only.

### 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:~~

- ~~• Borough-Wide: 40% affordable provision (tenure to be determined);~~
- ~~• Town Centre: 25% affordable provision (tenure to be determined);~~

For traditional Care Homes, **in the case of on-site provision**, the requirement will be for the **on-site** provision **of the equivalent percentage in to be made in the form of** affordable care beds in order to meet the Policy.

### 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.

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.

The council will only consider relaxing this affordable housing requirement, in part or in full, in exceptional circumstances, where a scheme is clearly subject to abnormal costs, not including land costs, and not otherwise envisaged by the Local Plan Viability Assessment. This must be evidenced by robustly assessed viability appraising various permutations of affordable housing provisions to best address local affordable housing needs which will be independently assessed. Should concessions be agreed by the council then claw-back mechanisms will be expected to be put in place and independently monitored. The scheme must also evidence that it addresses a demonstrative and immediate housing need.

Build to Rent will also be considered as an exception while all units remain for rent. This is further detailed in Policy H6, which will revert back to Policy H5 should such schemes cease to be predominantly private rental.

Rent to Buy is considered as an exceptional Intermediate Tenure that may be considered only in exceptional circumstances where it can be evidenced to address local housing needs, and will not be considered as an **n Affordable rental Rent** tenure.

### **Reasoned Justification**

~~13.2019~~*The cost of market housing for both sale and rent in Crawley is significant, with median house prices in 2021 at £310,000 and median rents of £1,033 per month. The median house prices now stand at 8.9 times median earnings in Crawley. The significant costs of market housing, and the difficulties facing the younger households and those on low to moderate incomes in being able to afford housing in the private market, directly influences the need for affordable housing in the borough. The Strategic Housing Market*

Assessment (2019) analysis indicated a net need for 739 affordable homes per year in Crawley, of which 563 dwellings per year are needed as rented affordable housing. This supports a split of 75% rented and 25% shared-ownership homes in Crawley.

13.240 Affordable housing refers to properties that are offered by the local authority or Registered Providers for rent or part-ownership at affordable levels to eligible households whose needs are not met by the housing open market. The council expects rentals to be offered below market rent levels preferably as Social Rent at target rent levels, otherwise at Affordable Rent levels that shall not exceed 80% of open market rent values. Rent levels shall not exceed Local Housing Allowance rent levels (or its equivalent) where Affordable Rent shall be inclusive of service charges, and provided that there are provisions in place for those homes to remain affordable for future eligible households. The council will always pursue perpetuity in affordable housing provision to ensure the ability to serve future households over the long-term.

#### Rental Tenure

13.241 Borough-wide the council requires 40% affordable housing of which 75% is to be rental tenure, and in the Town Centre the council requires 25% affordable housing of which 60% is to be rental tenure. While Social Rent at target rent levels is preferred as being more affordable to those in housing need, the council accepts that this form of tenure requires higher levels of cross-subsidy. In the absence of sufficient subsidy, Affordable Rent tenure, as defined by the NPPF, will be acceptable and will be the minimum expectation in every instance.

13.242 Affordable Rented properties are to be made available to Registered Providers at their best consideration. Only in the event that a Registered Provider cannot be secured for the affordable rent units then after reasonable and evidenced endeavours, the council may explore alternative tenures at a similar level of discount, and only in exceptional circumstances may the council consider accepting a commuted payment in lieu of on-site affordable housing at the equivalent of 50% of Open Market Value.

#### Intermediate Tenure

13.243 While Crawley's predominant requirement is for affordable rented accommodation, Crawley also has a need for "intermediate" affordable housing. The Strategic Housing Market Assessment (2019) identifies that there is evidence to support the need for 25% of all affordable housing to be provided as affordable home ownership provision within Crawley, while the NPPF stipulates a minimum requirement of 10% of all residential dwellings to be made available for affordable home ownership. This shall remain the council's minimum requirement in every instance with off-site commuted payment in lieu only accepted in exceptional circumstances.

13.244 The intermediate housing market is identified as an emerging housing market; made available to households who are unable to buy a home on the open market. Intermediate housing includes Shared Ownership, Shared Equity and Discounted Market Sale, while Rent to Buy and First Homes may also be considered as an Intermediate Tenure if evidenced to address local housing needs. In all circumstances the council will seek to secure an element of perpetuity to address affordable housing needs into the long-term.

13.245 The council recognises that for the smaller sites, this tenure split may sometimes be impractical in management terms. In such cases, the composition of affordable housing will be agreed having regard to site specific circumstances and the particular needs of the locality, with rental accommodation remaining the first choice of tenure. The split between affordable housing for rent and other intermediate affordable housing will be

kept under review through Supplementary Planning Documents, as appropriate, reflecting changes in local needs.

- 13.276 *First Homes are an affordable housing product defined as homes available for first-time buyers (with a household income not exceeding £80,000) to purchase at a discount of at least 30% as compared with open market value. The discounted value cannot exceed £250,000 and the discount must be secured in perpetuity with a restriction placed on the title. The Written Ministerial Statement of 24 May 2021 and Planning Practice Guidance have set out a national requirement for 25% of affordable housing secured through developer contributions to be in the form of First Homes. The council will impose local eligibility criteria for First Homes, including a local connection test. The First Homes requirement does not apply to developments which, in accordance with the NPPF, are exempt from the requirement to provide at least 10% of homes in the form of affordable home ownership products.*
- 13.287 *Shared ownership properties, where required, are to be made available to a Registered Provider at their best consideration. In the event that a Registered Provider cannot be secured for the Shared-Ownership properties following reasonable and evidenced endeavours, then Shared Equity or Discounted Market Sale may be considered at 40% discount to market value, which shall be structured in perpetuity. In certain settings where a lower affordable housing requirement is permitted, such as the Town Centre, then there may not be the need to secure a Registered Provider and Shared-Equity or Discounted Market Sale may be considered in the first instance, where a minimum of 20% discount to market value will be expected, and secured in perpetuity. In either instance, the discounted equity shall either remain locked-in by way of a Covenant on Title, or transferred to the council by way of a Second Charge on Title. Only in exceptional circumstances will a commuted payment be considered in lieu of on-site affordable housing.*

#### Policy Context

- 13.298 *The NPPF establishes an expectation that major development involving the provision of housing should include at least 10% of the homes to be available for affordable home ownership<sup>120</sup>. However, exceptions to this element are allowed where this would “exceed the level of affordable housing required in the area or significantly prejudice the ability to meet the identified affordable housing needs of specific groups”<sup>121</sup>. Whilst Crawley has an affordable home ownership need, the intermediate tenures (such as shared ownership) are a more appropriate form of affordable home ownership for Crawley. Furthermore, because there is a clear and acute need for rented affordable housing from lower income households, it is important that a supply of rented housing is maintained to meet the needs of this group. Where affordable home ownership is agreed, securing perpetuity to ensure housing remains at a discount for future eligible households will be the council’s priority. More detail will be provided in the updated Affordable Housing Supplementary Planning Document in due course.*
- 13.3029 *Private Market Rent reflects open market rental values and, therefore, falls outside of the definition of affordable housing. However, this form of tenure is emerging through the Build to Rent programme on dedicated market rent schemes and this rental tenure may play a part in meeting affordable housing need where rent levels are contained to within Local Housing Allowance rates with nominations offered to the council. The council’s policy approach to affordable housing provision in Build to Rent schemes is detailed further in Policy H6 below.*

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<sup>120</sup> As defined in the NPPF Glossary, National Planning Policy Framework, page 64 (2021) MHCLG

<sup>121</sup> National Planning Policy Framework, paragraph 65 (2021) MHCLG

- 13.310 *Crawley Town Centre is expected to deliver high density residential schemes as defined in Policy CL4, where, due to the form of high density construction and higher land values in the Town Centre, viability is known to be a significant challenge to delivery.*
- 13.321 *Section 106 Planning Agreements (or Unilateral Undertakings) will be required to secure the delivery of affordable housing. The council will expect affordable housing to receive free serviced land as a starting point, whereby the Registered Provider receives transfer of the built-out units at a price commensurate with the affordable tenure or under special circumstances receives free transfer of serviced land at an equivalent aggregate value. The S106 Agreement will require applicants to provide an Affordable Housing Scheme setting out the provisions of affordable housing in keeping with this Policy requirement.*
- 13.332 *Information regarding the expected contributions associated with this Policy is set out in the Planning Obligations Annex attached to this Local Plan. This has been subject to scrutiny through the Whole Plan and CIL Viability Study (2020, updated 2022) and meets the requirements of the national Planning Practice Guidance. Viability will not be an argument for not meeting the Policy requirements for 40% affordable housing, with a 75%/25% tenure split between rental and shared-ownership in most cases, or 25% affordable housing on a 60%/40% tenure split in the Town Centre. National guidance<sup>122</sup> is clear that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. The weight given to any viability assessment submitted alongside a planning application which seeks to differ in the affordable housing contribution from the Policy position of 40% with the 75/25 tenure split, or 25% on a 60/40 tenure split, will be a matter for the Local Planning Authority and will only be considered where there are costs associated with a particular site which could not have been envisaged at the Plan-making stage or where circumstances have changed since the Plan was brought into force.*
- 13.343 *In such exceptional circumstances, the council may be required to consider viability, where schemes may be faced with abnormal costs, and in such instances a detailed viability assessment will need to be submitted. This will need to reflect the recommended approach in national planning guidance, including standardised inputs. Where this is agreed it will also be necessary for the viability assessment to undertake modelling of various affordable housing options rather than relying on an assumption that no affordable housing can be provided. This viability assessment shall be independently assessed at the developer's expense, and where any concessions are agreed for viability reasons the S106 Agreement will be expected to include claw-back provisions, and an independent assessor appointed at the developer's expense to monitor the scheme against the claw-back provisions.*
- 13.354 *In any case, the national expectation, as set out by the NPPF, is that major housing developments will make at least 10% of the homes available for affordable home ownership, unless this would significantly prejudice the ability to meet the identified affordable housing needs of specific groups<sup>123</sup>. For sites in Crawley, therefore, and only where exceptional viability circumstances exist, the minimum of 10% affordable home ownership is expected to be provided as an absolute minimum on any particular housing scheme. The council will also consider negotiations in relation to rental tenure for this proportion as a preferred alternative, due to the significant affordable rental needs arising from the borough.*

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<sup>122</sup> National Planning Policy Framework, paragraph 58 (2021) MHCLG

<sup>123</sup> National Planning Policy Framework, paragraph 65 (2021) MHCLG

## Affordable Care

- 13.365 Local Plan Policy H5 applies to all new residential development, and does not distinguish between those considered to be within Use Class C2 or Use Class C3, nor does the NPPF set out that certain types of specialist accommodation for older people are exempt from affordable housing contributions<sup>124</sup>. It is considered that affordable housing is required across the full spectrum, and that as C2 Use cannot be restricted to those that can afford this Use Class. Affordable forms of care need to be factored into all developments of C2 Use.
- 13.376 The SHMA highlights Crawley has a lower proportion of owner occupier older person households than other parts of the housing market area (60% in Crawley compared to 75% in Horsham) and they are also more likely than any other households to be in the social rented sector (29.3% of older person households in Crawley). In particular, single older people have a much lower level of owner-occupation than larger older person households (51.5% compared to 71.0%), with a much higher proportion living in the social rented sector (35.8% of single older person households in Crawley). Only 2% of older person households in Crawley live in the private rented sector<sup>125</sup>. Using the 2015 Index of Multiple Deprivation, the SHMA anticipated that 56% of specialist accommodation for older people is needed to be provided by the market sector, and the remaining 44% is needed in affordable tenures<sup>126</sup>.
- 13.387 With regards to people with a long-term health problem or disability (LTHPD), the analysis for the SHMA showed that people with a LTHPD are more likely to live in social rented housing (35.7% with a LTHPD compared to 20.8% without a LTHPD). Given that typically the lowest incomes are found in the social rented sector, the analysis would suggest that the population/households with a disability are likely to be relatively disadvantaged when compared to the rest of the population<sup>127</sup>. In addition, the SHMA has highlighted that people living in the social rented sector are almost twice as likely to have a LTHPD than those in other tenures (22.4% of social rent with LTHPD compared to 12% of other tenures with LTHPD)<sup>128</sup>.
- 13.398 The Strategic Housing Market Assessment (SHMA) looked at the principle of securing affordable housing/affordable care, considering the distinctions between Use Classes C2 (Residential Institutions) and C3 (Dwelling Houses). However, the SHMA concludes that the Use Class on its own need not be determinative on whether affordable housing provision could be applied. In accordance with the advice in the SHMA, the Local Plan Viability Study considered the specific viability of extra care and C2 residential institutions.
- 13.4039 The Viability Study considered ‘sheltered’ housing and ‘extra care’ housing typologies (this included a higher proportion of communal areas), along with a ‘nursing home’ commercial typology. The Viability Study supports the principle of affordable housing from such schemes, although it acknowledges **that particular consideration may need to be given on a case-by-case basis given** the complexities and issues to resolve in

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<sup>124</sup> Northern West Sussex Strategic Housing Market Assessment, paragraph 10.40, page 131 (November 2019) Icen Projects

<sup>125</sup> Northern West Sussex Strategic Housing Market Assessment, paragraph 10.8, page 122 (November 2019) Icen Projects: <https://crawley.gov.uk/sites/default/files/documents/PUB354604.pdf>

<sup>126</sup> Northern West Sussex Strategic Housing Market Assessment, paragraphs 10.24 – 10.25, page 127 (November 2019) Icen Projects

<sup>127</sup> Northern West Sussex Strategic Housing Market Assessment, paragraph 10.14, page 125 (November 2019) Icen Projects

<sup>128</sup> Northern West Sussex Strategic Housing Market Assessment, paragraph 10.15 and Table 61, pages 125-126 (November 2019) Icen Projects

terms of combining care services and housing<sup>129</sup>. *In consideration of the issues specific to this type of residential development, Policy H5 sets out a tailored approach, based on the use of Commuted Sum Calculators for the Borough-Wide and Town Centre areas (intended to reflect the headline 40% and 25% requirements for those areas in the form of a square metre levy). The Net Sale Area (NSA) of the scheme (excluding communal areas) is entered into the calculator and that value shall determine the number of units (or bed spaces) that can be acquired on-site, with or without any subsidy, and of appropriate tenure.*

*13.40 This value can then either be put towards on-site provision (where West Sussex County Council agree to support the package), or else paid as a commuted payment towards off-site provision. On-site provision will be reliant on West Sussex County Council Adult Services agreeing to support the care package, and any reasonable care-related service charges. Where Adult Services elect not to support a scheme, this will be considered an exceptional circumstance, and the council will, in this case, accept an off-site commuted payment as valued at the outset. For C2 schemes of 10 dwellings or less, as for C3 schemes, the calculator ensures that headline affordable housing requirements are ‘tapered’ in proportion to scheme size. This approach is set out more fully in the Planning Obligations Annex. In exceptional cases, where particular consideration may need to be given to site-specific issues ~~In such cases,~~ the council will consider any details of care and communal facilities costs, if relevant, as part of viability information. However, the longer term financial models associated with specialist accommodation must also be factored into the assessment.*

## **Build to Rent**

13.41 Build to Rent is considered to be a distinct asset class within the private rented sector in Planning Practice Guidance, and has been defined in the NPPF glossary in order to simplify its treatment within the planning system. According to the NPPF, Build to Rent means ‘purpose built housing that is typically 100% rented out’<sup>130</sup>.

### **Policy H6: Build to Rent**

A proposal including Build to Rent housing will be supported where it is in conformity with the other policies and requirements of this Local Plan.

Build to rent schemes are regarded as an exception to Policy H5, whereby Policy H5 will be deferred for as long as the scheme remains all-rental, during which time Affordable Private Rent is expected on the following basis:

- i. Schemes shall incorporate an element of Affordable Private Rent comprising:
  - 20% of dwellings in schemes within the Town Centre, or
  - 30% of dwellings in schemes elsewhere in the borough.

In both settings rentals will not exceed either 80% of market rent values or Local Housing Allowance rates, and shall be offered to the council for qualifying nominations on an Assured Shorthold Tenure (AST) basis. Under no circumstances will less than 20% Affordable Private Rent be provided in line with NPPF guidance.

<sup>129</sup> Local Plan and Community Infrastructure Levy Viability Assessment, para. 3.7.24 (2021) DixonSearle

<sup>130</sup> National Planning Policy Framework, Glossary (2021) MHCLG



- ii. A deferred Affordable Housing Scheme is to be identified, for future provision in the event that the scheme ceases to be all-rental, in accordance with the requirements of Policy H5 (as applicable to the location of the development).
- iii. The deferred Affordable Housing Scheme will be triggered and delivered in the event that the scheme ceases to be all-rental, and shall be disposed of to a Registered Provider at their best consideration.

In order to qualify as Build to Rent for the purposes of this Policy, schemes must adhere to the Build to Rent definition in the Glossary to the NPPF and will be required to enter into a S106 Agreement which will include provision regarding the following issues:

- a) Securing the status of the units as Build to Rent for at least 15 years;
- b) Securing the unified ownership and unified management across the Build to Rent scheme, embracing both Market Rent and Affordable Private Rent units;
- c) Affordable housing requirements (including review mechanisms where appropriate) and regular provision of evidence of compliance by the scheme operator;
- d) Securing council nomination rights in respect of the affordable units through an agreed Deed of Nomination;
- e) Clawback mechanisms to secure compensation in the case of the loss of Market Rent homes before the expiry of the covenant period, or in the event that the affordable housing does not fully meet the policy requirement;
- f) Scheme management arrangements.

### **Reasoned Justification**

- 13.42 *Planning Practice Guidance states: ‘As part of their plan making process, local planning authorities should use a local housing need assessment to take into account the need for a range of housing types and tenures in their area including provisions for those who wish to rent.’ It further states that ‘If a need is identified, authorities should include a plan policy setting out their approach to promoting and accommodating build to rent.’*
- 13.43 *To accommodate this particular investment model, and where ongoing management is to be provided in a fully rented scheme, the council will not require a Registered Provider to take on the affordable units, and council is prepared to defer the full application of the requirements of Policy H5 for as long as the scheme remains all-rental.*
- 13.44 *In such circumstances, the council will require the rentals to be made available at affordable rent levels, not exceeding 80% of the equivalent open market values and not exceeding Local Housing Allowance rates, and the council will enter into a Lettings Agreement to allow for qualifying nominations to be made into the affordable private rented units.*
- 13.45 *The scheme will be expected to enter into a S106 Agreement that will remain with the land, and in the event that the scheme ceases to be all-rental the S106 Agreement will require the affordable units, including the deferred shared ownership/intermediate tenure properties, to be made available to Registered Providers in line with the council’s affordable housing policy, which shall include any claw-back provisions in the event that council allows any concessions to the affordable housing Policy H5 requirements.*

### **Self and Custom Build**

- 13.46 Self-build and custom-build housing is defined in the NPPF as ‘housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by

that individual. Such housing can be either market or affordable housing<sup>131</sup>. Planning Practice Guidance states that ‘in considering whether a home is a self-build or custom build home, relevant authorities must be satisfied that the initial owner of the home will have primary input into its final design and layout’.

### **Policy H7: Self and Custom Build**

A proposal including self-build and/or custom-build housing to be provided on a serviced plot of land will be supported where it is in conformity with the other policies and requirements of this Local Plan.

Subject to the exceptions listed below a residential (Use Class C3) development including 50 or more units will be required to provide 6% of the total area occupied by residential plots in the form of serviced plots for self-build and custom housebuilding.

The exceptions are:

- i. Developments providing a proportion of affordable housing over and above the proportion required in accordance with Policy H5, may offset this additional proportion against the self-/custom-build requirement by reducing the requirement by one percentage point for each additional percentage of units delivered as affordable housing;
- ii. Developments containing only flatted development;
- iii. Developments on sites whose total area is at least 50% brownfield;
- iv. Developments where the residential element consists solely of converted floorspace.

Self- and custom-build plots must have access to the public highway and connections to electricity, water, wastewater and telecommunications services, or be capable of being provided with them before the expiry of any planning permission or permission in principle granted in relation to them.

Self- and custom-build plots provided in accordance with the 6% requirement detailed above will be subject to a legal agreement requiring that they be marketed for 12 months, after which they may be developed as speculative housing in accordance with the other policies and requirements of this Local Plan.

Any proposal (either in the form of an outline or full application) for more than one dwelling which includes an element of self- or custom-build housing must be identified as a phased development and supported by a phasing plan.

#### **Reasoned Justification**

13.47 *The Self-build and Custom Housebuilding Act 2015 requires Local Authorities to maintain a register of individuals and associations who are seeking to acquire serviced plots of land for the purpose of building homes for their own occupation. The same Act requires councils to have regard to the demand demonstrated by their Register when carrying out their functions with regard to planning, housing, the disposal of council land, and regeneration.*

13.48 *As of 31 March 2022, there were 136 individuals and one association entered on Crawley Borough Council’s Self-build and Custom Housebuilding Register. The Register is divided into Part 1 and Part 2, with only applicants who pass a Local Connection Test*

<sup>131</sup> National Planning Policy Framework, Glossary (2021) MHCLG

being included in Part 1. As of 31 March 2022, there were 104 individuals and one association on Part 1 of the Register and 32 individuals on Part 2.

13.49 *The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) further introduces a ‘Duty to Grant Planning Permission’. This requires the council to grant ‘suitable development consent’ in respect of a sufficient number of serviced plots of land to match the number of entries on Part 1 of the Register. Entries are divided into annual ‘base periods’, according to their date, with the corresponding suitable development consents being required to be granted within three years after the end of each base period.*

13.50 *The acute affordable housing need in the borough justifies offsetting affordable housing delivery against Self-build and Custom build units. Much of Crawley’s future housing delivery is envisaged as flatted schemes on brownfield sites, with some as converted building, where it is recognised it would be impracticable to require Self or Custom-build units.*

### **Gypsy, Traveller and Travelling Showpeople**

13.51 The Housing Act 2004 requires all local authorities to assess the accommodation needs of Gypsies, Travellers and Travelling Showpeople, take account of their needs in accommodation assessments, and outline how identified needs will be met. Furthermore, the National Planning Policy for Traveller Sites requires that local planning authorities make an assessment of their accommodation needs for the purposes of planning and to develop fair and effective strategies to meet this need through the identification of land for sites.

#### **Policy H8: Gypsy, Traveller and Travelling Showpeople Sites**

##### Site Provision

The following site is allocated on the Local Plan Map as a reserve Gypsy and Traveller site for up to ten pitches to meet the future needs of the existing population within Crawley. This site is considered to be critical to the delivery of future Gypsy and Traveller pitches in Crawley and is identified as being ‘developable’ in years 6-10 or 11-15 (2029/30 – 2039/40) of the Plan, dependent on when the ‘need’ arises.

- Broadfield Kennels, southwest of the A264

Acceptable development of this site will include adequate highway and pedestrian and cycle access being achieved, along with appropriate design, layout and landscaping to ensure the requirements of the [High Weald AONB Management Plan](#) are satisfied and the impacts of development adjacent to the country park are mitigated. Both the landscape character and ecological value of the Broadfield Kennels site will be assessed, and any harmful impacts will be adequately mitigated if required.

Ongoing monitoring of Gypsy, Traveller and Travelling Showpeople accommodation needs within Crawley will ensure that any identified ‘need’ for a Gypsy and Traveller pitch is accommodated on the reserve site.

##### Criteria for Assessing other Proposals

Proposals for a new permanent or transit Gypsy, Traveller and Travelling Showpeople site will only be considered suitable if the proposed site:

- a) is not subject to existing or predicted air, road and/or rail noise in excess of 57 decibels for permanent sites, 60 decibels for long term temporary/transit sites [allowing stay](#) of up to one month, and 66 decibels for [overnight/short term temporary stay/transit temporary transit](#) sites;

- b) does not create a design and amenity impact that is incompatible with the surrounding area, particularly when located within residential areas or on land beyond the Built-Up Area Boundary;
- c) is not located in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans;
- d) is in a sustainable location that reduces the need for long distance travelling, and to reflect traditional lifestyles, whereby some travellers live and work in the same location;
- e) avoids placing undue pressure on infrastructure and community services; and
- f) meets an identified local need for Gypsy, Traveller and Travelling Showpeople accommodation.

Where proposals are located in areas predicted to be noise affected at some point in the future, temporary planning permission may be appropriate.

### **Reasoned Justification**

- 13.52 *Crawley is a constrained urban environment and is in a position where difficult prioritisation of new development is required as the last undeveloped or underdeveloped sites are allocated for future uses. This situation results in high land values and limited opportunities for Gypsies, Travellers and Travelling Showpeople to bring forward site provision themselves. There are currently three ~~authorised~~ Gypsy and Traveller sites in Crawley, for six pitches in total, and one authorised site for Travelling Showpeople with three plots. The existing Gypsy, Traveller and Travelling Showpeople sites are all located within the land to the north of the borough. ~~Two of the authorised~~ **New or renewed** Gypsy and Traveller sites **in this location would be** ~~are~~ subject to temporary permissions, as this area is acknowledged to be unsuitable for permanent caravan accommodation, particularly due to the potential future southern runway expansion proposals for Gatwick Airport. In addition, there is a more substantial local population living within bricks and mortar accommodation.*
- 13.53 *The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2020, and the emerging 2023 draft Assessment) for Crawley indicates a potential future need of up to ten pitches for Gypsies and Travellers arising from the existing population within Crawley. This includes the families currently accommodated on the existing temporary permitted pitch sites. Furthermore, whilst the **original** survey work completed for those in bricks and mortar accommodation did not identify any immediate need for additional sites, **and no need arising from these families has been evident over the 10 year period since that was carried out.** it is inherently improbable that within the next 15 year period there will be no new households formed requiring additional site provision.*
- 13.54 *This need will be met by the provision of a site at the former Broadfield Kennels, southwest of the A264. This site is located within the High Weald **National Landscape AONB** and outside the current Built-Up Area Boundary (BUAB). Therefore, the site will need to be well planned and soft landscaped to ensure that the visual impact on the **National Landscape AONB** is negligible and that the natural landscape is, where possible, positively enhanced. Mitigation measures for the potential impact on the natural environment will be sought where appropriate.*
- 13.55 *The council will continue to search for and analyse the potential for alternative sites as factors change over the Local Plan period, most critically in relation to the future expansion of Gatwick Airport. The council will continue to work cooperatively with its neighbouring authorities to maintain constructive joint working across the Gatwick Diamond.*

- 13.56 *In addition, this Policy also outlines the criteria upon which any other Gypsy, Traveller and Travelling Showpeople proposals will be assessed to ensure site provision occurs in locations that offer a suitable living environment for future inhabitants and protect existing neighbours from inappropriate development.*
- 13.57 *To deal with sites brought forward privately on unallocated land, land ordinarily considered suitable for housing development will be considered suitable for traveller accommodation subject to the proposal being compatible in design and amenity terms with the surrounding area, especially where proposals include employment based activities within their schemes. However, caravans offer a much lower level of acoustic attenuation than bricks and mortar accommodation and the long term exposure to noise would affect the residents' health. Exposure to noise in excess of 57 decibels on a permanent basis, 60 decibels for long term temporary sites **allowing stay** of up to one month and of 66 decibels for **overnight/short term temporary stay/transit temporary transit** sites would not be in the long term interest of future inhabitants.*
- 13.58 *Should Gatwick Airport's proposals for an additional runway to the south of the existing Airport be brought forward, areas of the borough currently falling inside acceptable limits may become unsuitable in the future as noise contours migrate south into the built up area. For these areas, temporary **planning** permission may be an appropriate decision until certainty is achieved.*

### **Houses in Multiple Occupation**

- 13.59 A house in multiple occupation (HMO) is a property that is occupied by a number of individuals who share facilities, or do not have exclusive occupation of the whole property. HMOs generally comprise accommodation where three or more individuals share basic amenities (bath/shower, WC or kitchen). HMOs can commonly be occupied by a group of individuals (e.g. students, young professionals, etc.) sharing a house or flat, individuals living in sub-divided bed-sit accommodation, and some properties converted into several flats. Bed and breakfast and hostel accommodation occupied by individuals as their permanent address are also considered to be HMOs.

#### **Policy H9: Houses in Multiple Occupation**

Proposals for the development of, and change of use of an existing property to a House in Multiple Occupation will normally be permitted provided that:

- i) The location, design and layout of the development is appropriate for the proposed occupiers;
- ii) The proposal, by virtue of its intensity of occupation and activity or due to its cumulative impact in the area, would have no adverse impact upon the character of the area and the amenity and privacy of neighbouring properties;
- iii) Development can meet its operational needs (e.g. parking, servicing) including Crawley Borough Council's adopted HMO Standards.

#### **Reasoned Justification**

- 13.60 *HMOs provide a much-needed source of housing supply in Crawley, particularly for people employed in the service sector. However, a large number of HMOs in one area can change the physical character of that area and this can lead to conflict with the existing community. Tenants equally can suffer from poor conditions and mismanagement of the properties by landlords.*
- 13.61 *There continues to be a need for this type of accommodation in Crawley since it provides affordable and convenient accommodation for a wide range of groups,*

*including young single people and those requiring care in the community. Whilst shared accommodation is normally appropriate within residential areas close to shops and services, it can also cause problems due to the intensity of occupation and activity. Accordingly, regard must be had to the standard of this accommodation, traffic, and parking implications together with its impact upon the amenity and privacy of neighbouring properties and the general character of the area. Appropriate measures may be required to minimise the transmission of noise and generally to avoid causing a nuisance to neighbouring properties.*

- 13.62 *Policy H4 (Future Housing Mix) recognises that the planning system can assist in achieving a mix of households within the town's neighbourhoods by meeting different housing needs whilst protecting the interests of other residents, landlords and businesses. This can best be delivered by preventing the development of excessive concentrations of HMOs and encouraging a more even distribution across the town. Some neighbourhoods, including Furnace Green, Ifield, Langley Green, Southgate and West Green have significant concentrations of HMOs, particularly in areas with larger semi-detached and detached dwellings and townhouses.*
- 13.63 *The main concern with HMOs is that a large number of individuals can occupy one property, all living independently and creating more disruption to surrounding areas than a group of people living together, in terms of noise, parking and general disturbance associated with daily routines. Inadequate parking leading to unauthorised parking is a significant issue in many neighbourhoods in Crawley, with the early New Town neighbourhoods planned with one car parking space per nine houses. It is important to have policies which can control issues such as this and to ensure that permission is only granted for those properties that have adequately sized rooms and suitable communal facilities for its occupants as well as being in appropriate locations, in terms of proximity to public transport routes.*
- 13.64 *Given that councils no longer have control over the loss of dwellinghouses to small HMOs, there is a high risk of concentrations of HMOs. It is considered that, where possible, new HMOs should be monitored by location and concentration. Consideration may need to be given to the need to introduce further Article 4 Directions removing Permitted Development Rights for the conversion of dwellings to small HMOs.*
- 13.65 *In assessing the acceptability of a proposed HMO in terms of cumulative impact and the local concentration of HMOs, the council will operate in accordance with the following principles:*
- *The proportion of residential dwellings within any area subject to an Article 4 Direction in respect of change of use to a HMO, including the application property, which are HMOs should not exceed 20%;*
  - *Proposals for new HMOs will be resisted where they would result in a neighbouring residential property which is not an HMO being bounded by HMOs on both sides within a street frontage;*
  - *HMOs should not form continuous frontages of more than two residential dwellings.*
- 13.66 *The council will introduce further supplementary guidance on the application of this Policy in due course.*

# Environmental Sustainability

## ***Protecting the Environment: Sustainability***

*By 2040, Crawley Borough Council will have eliminated net carbon dioxide emissions arising from council activities, helping to lead Crawley's progress towards becoming a carbon neutral town. Development will be water efficient, and water neutral where required, ensuring that new homes and economic growth can be delivered against the backdrop of serious water stress and without causing harm to protected designated sites. Crawley will be seen as a place where green growth is the driver of the economy and where green technology and businesses can thrive. Active travel and public transport will be significantly improved and supported by a road network that prioritises sustainable transport modes. Electric Vehicles will be promoted along with, and through, e-car clubs. A sustainable road network will be complemented by a good public transport system, giving people choice about how they travel. As a modern town, the technological and communication infrastructure will be in place to ensure residents and businesses have the support needed to develop and grow.*

*Conserving natural resources to support future growth will be vital to the longevity of the town. Air, noise and water pollution will be reduced. The borough will prepare for the increasing effects of climate change, through adaptation measures including lower water usage standards, including water neutrality where necessary, and delivering a net gain in biodiversity, and supporting nature recovery. Losses to protected and priority species and habitats will have been avoided and the delivery of vital ecosystem services, including pollination, flood alleviation and carbon capture, will have been enhanced in order to facilitate a sustainable and resilient future.*



## Green Infrastructure & Biodiversity

- 14.1 Crawley's natural environment is critical for wildlife conservation, adapting to and mitigating the effects of climate change as well as being of great importance to the health and wellbeing of the people who live, work and visit Crawley.
- 14.2 Throughout the borough there is a wide range of sites important for nature conservation and biodiversity, including extensive areas of woodland, local nature reserves, public parks and smaller areas within the neighbourhoods. This network of green spaces supports natural processes, such as flood mitigation and carbon capture and supports the health and quality of life of the population. Crawley's waterways also have an important biodiversity role, albeit that many are culverted underneath the urban area.

### Chapter Content

- 14.3 This chapter sets out policies to guide the relationship between development proposals and local, national and global environmental protection and enhancement of the borough's green infrastructure.

### The Key Issues

- 14.4 With an increasing population and the consequent need for development, the impact on the natural environment is a key issue. The planning policies in this chapter will ensure that Crawley's natural and semi-natural environment is enhanced as Crawley grows and changes over the next 16 years.
- 14.5 As a New Town, Crawley was originally designed with many green spaces and landscaping integrated within the developed area. These serve to separate and give identity to the neighbourhoods. Increasing levels of development present a potential threat to the amenity and biodiversity value of green infrastructure in Crawley. There is a risk that this becomes further fragmented and that the quantity and quality of green space is reduced.
- 14.6 The Natural Environment White Paper (DEFRA, 2011) highlighted that nature in England is highly fragmented and unable to respond effectively to pressures such as climate and demographic change. Crawley has an extensive network of green spaces, many of which have or are capable of increased biodiversity value to help the town adapt to climate change and create an overall net gain in biodiversity. It is important that the Local Plan ensures that development does not compromise the ability of the town to achieve the above aims and ensure enhancement is realised.

### Local Plan Policies

#### Green Infrastructure

- 14.7 Green infrastructure is the network of multi-functional green space and waterways both new and existing, and both rural and urban which supports natural and ecological processes and is integral to the health and quality of life of the population. It consists of useable spaces for both people and wildlife and ranges from large-scale areas of public open space and recreational space, including accessible countryside to smaller scale provision in the form of street trees, private gardens and allotments. The term 'multi-functional' refers to the various functions for example, local character, functional linkages, recreation, meeting community needs, visual amenity, biodiversity and/or local food or energy crop production. Crawley's green infrastructure network extends into the countryside beyond the Built-Up Area Boundary and beyond the borough's



administrative boundaries. These links should be maintained, enhanced and created as development in the town continues.

- 14.8 Green infrastructure can also offer benefits as a “Nature Recovery Network”. This is a joined-up system of places important for wild plants and animals. It allows plants, seeds, nutrients and water to move from place to place and enables the natural world to adapt to change. It provides plants and animals with places to live, feed and breed. It can only do so effectively if, like the road network, it is treated as a joined-up whole.
- 14.9 The provision of safe and accessible green infrastructure is acknowledged as being one of the key ways to achieve healthy, inclusive and safe places which enable and support healthy lifestyles<sup>132</sup>. In particular for Crawley, as a Dementia-Friendly town, it is vital that people with dementia stay as active as they can – physically, mentally and socially. People with dementia need meaningful activities they enjoy, which can maintain their confidence. Access to green space and nature has particular benefits for people with dementia, including better mood, memory and communication and improved concentration<sup>133</sup>.

### **Strategic Policy GI1: Green Infrastructure**

Any growing urban area will place additional stress on the natural environment, including the aquatic environment. Crawley’s multi-functional green infrastructure network will be conserved and enhanced through the following measures:

- i. Development which protects and enhances green infrastructure will be supported;
- ii. Development proposals should take a positive approach to designing green infrastructure, utilising the council’s supplementary planning documents to integrate link and enhance the network of green assets;
- iii. Development proposals which reduce, block or harm the functions of green infrastructure should be avoided. Any loss or impact will be required to be adequately justified, minimised, mitigated or, as a last resort, compensated for, to ensure the integrity of the green and blue infrastructure network is maintained;
- iv. The strategic green infrastructure network is afforded the highest protection due to its high value from existing or identified potential multiple functions, for example as recreation, routeways, access to the countryside, wildlife and climate mitigation;
- v. Development proposals should maximise the opportunity to maintain and extend green infrastructure links to form a multi-functional network of open space, providing opportunities for walking and cycling, and connecting to the urban/rural fringe and the wider countryside beyond;
- vi. Cross-boundary matters relating to green infrastructure should be considered and incorporated at the early stage of an application;
- vii. Large development proposals will be required to provide new and/or create links to green infrastructure as well as take into consideration the use of SuDS and methods that incorporate blue infrastructure into development designs to improve the visual amenity of the development, to account for Policy EP1 and to aid in reducing surface water run-off.
- viii. Householder developments and small non-residential extensions should take into account Policy EP2 and innovative solutions that incorporate green and blue infrastructure into designs at an early stage.

<sup>132</sup> National Planning Policy Framework, paragraph 92c (2021) MHCLG

<sup>133</sup> Dementia and Town Planning RTP1 Practice Advice 2017, page 4 (2017) RTP1

- ix. Where possible, Natural England’s Accessible Natural Green Space Standard recommendations and the Woodland Trust’s Woodland Access Standard should be used to assess a development proposal’s location in relation to existing accessible natural green space and woodland. As a minimum, developments should seek to ensure new development proposals meet the Crawley local standards for natural greenspace set out in paragraphs 7.13 and 14.16 relating to quantity, accessibility, quality and value.

### **Reasoned Justification**

- 14.10 *Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries<sup>134</sup>. Proposals for development will increase pressures on the borough’s landscapes and green spaces, presenting opportunities for enhancing and extending Crawley’s green infrastructure. For the town to develop and grow in a sustainable manner, it is important to ensure that green infrastructure is embedded in the planning process at the earliest stage.*
- 14.11 *Green infrastructure should not just be considered as an adjunct to new development. Connected networks of green spaces around new development should be treated as integral to the planning and design process conscious of its place within wider green infrastructure networks. This is assisted by an integrated review of existing green infrastructure functions (biodiversity, flood management, rights of way, open space, etc.). The Green Infrastructure Study (2016) identifies deficiencies and need in relation to future growth and the desires of the town’s residents to determine where improvement should be focused. An Ecological Services study (2020) has been undertaken for Crawley, which identifies the opportunities of Crawley’s green infrastructure to meet a wide range of positive functions, including air quality, noise mitigation and ecological connectivity. This baseline evidence will be used to consider opportunities for improving and extending these functions through new landscaping and open space provision through new development schemes and to assess the cumulative and wider impact of development proposals on the green infrastructure network.*
- 14.12 *The NPPF requires local authorities to plan strategic development considering the impacts on existing infrastructure and the need for new infrastructure to service that development and also to contribute to and enhance the natural and local environment. [Natural England have produced a Green Infrastructure Framework. The framework has developed 15 Green Infrastructure principles. The framework sets out each principle, a description of the principle, what the principle is seeking to achieve, how to produce good Green Infrastructure and the relation to government policy and guidance.](#) The Local Plan evidence base, including consultation responses, provides a clear message that Crawley’s green infrastructure is fundamental to residents’ quality of life and the wider environment. The Green Infrastructure Policy and design, landscape, open space and biodiversity policies seek to reflect that importance.*
- 14.13 *Through a range of Local Plan policies, the council will seek to achieve the provision, retention and/or enhancement of the specific functions of green infrastructure:*
- a. *Publicly accessible open space including formal sports facilities and informal amenity space;*
  - b. *The High Weald [National Landscape](#) Area of Outstanding Natural Beauty;*
  - c. *Beyond the built up area where landscape character areas have been defined;*

<sup>134</sup> National Planning Policy Framework, paragraph 175 (2021) MHCLG

- d. Value of existing soft landscaping – character and appearance, structure, screening or softening;
- e. Requirements of development – amenity spaces including private gardens, landscape schemes, street trees, green roofs and walls and links to and between areas of public open space and accessible countryside;
- f. Areas of biodiversity value such as Local Wildlife Sites, Local Nature Reserves, adjacent SSSIs, Biodiversity Opportunity Areas and Ancient Woodland;
- g. Waterways and water bodies;
- h. Heritage Assets;
- i. Opportunities to meet open space, sport and recreation needs;
- j. Green spaces for flood storage, conveyance, and SuDS.

14.14 The table below sets out Natural England’s [updated](#) Accessible Natural Greenspace Standards and the Woodland Trust’s Access Standard. Ideally, both sets of standards should be met for all new development to be located within the distance criteria for each size of accessible natural greenspace and woodlands. However, it is recognised that in an urban area such as Crawley, where there is a lack of available land for large new provision, a pragmatic approach is necessary. The table below also sets out the local standards for natural greenspace established by Crawley’s Open Space, Sport and Recreation Assessment (2020).

<p><i>Natural England’s Accessible Natural Green Space Standards<sup>135</sup> recommend that all people should have accessible natural green space:</i></p>	<ul style="list-style-type: none"> <li>• Of at least two hectares in size, no more than 300m (five minutes’ walk) from home.</li> </ul>
	<ul style="list-style-type: none"> <li>• At least one accessible 20-hectare site within 2km of home.</li> </ul>
	<ul style="list-style-type: none"> <li>• One accessible 100-hectare site within 5km of home.</li> </ul>
	<ul style="list-style-type: none"> <li>• One accessible 500-hectare site within 10km of home.</li> </ul>
	<ul style="list-style-type: none"> <li>• A minimum of one hectare of statutory local nature reserves per 1,000 people.</li> </ul>
	<ul style="list-style-type: none"> <li>• That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.</li> <li>• That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people’s homes.</li> </ul>
<p><i>The Woodland Trust’s Woodland Access Standard<sup>136</sup> aspires that:</i></p>	<ul style="list-style-type: none"> <li>• No person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size; and</li> <li>• There should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people’s homes.</li> </ul>
<p><i>Crawley Open Space, Sport and Recreation Local Standards for Natural Greenspace</i></p>	<ul style="list-style-type: none"> <li>• Quantity Standard: 1.8ha per 1,000 population.</li> <li>• Accessibility/Walkability Standard: 720m (15 minutes’ walk).</li> <li>• Quality Standard: Green Flag Quality Score of 70% to achieve a Good Quality Score or above.</li> <li>• Value Standard: Value Score of 60% and above to achieve a High Value Score.</li> </ul>

14.15 Existing natural green space provision within Crawley compares, as follows, against the local standards:

- **Quantity Standards:** The Open Space Assessment identified 93 Natural Green Spaces in Crawley, covering 296.62ha. This equates to 2.64ha per 1,000 population, currently exceeding the quantity standard borough-wide. However, the Assessment

<sup>135</sup> Accessible Natural Green Space Standards in Town and Cities (2011) Natural England

<sup>136</sup> Space for People, Targeting Action for Woodland Access (2017) Woodland Trust

has shown that in some urban areas, such as Langley Green, Southgate and West Green, the provision is already lower than this standard. The borough-wide provision is predicted to fall to 2.25ha per 1,000 population over the Plan-period, as the population increases (without new provision being made). Whilst for the borough as a whole this remains above the overall Quantity Standard of 1.8ha per 1,000 population, existing deficiencies in some areas are increased and deficiencies in provision will occur in Northgate and Three Bridges.

- *Accessibility Standards: Whilst the Assessment shows that almost all of Crawley meets the local accessibility standard for natural greenspace across the borough, the analysis looked at provision of Natural Green Space by including and excluding large natural green space sites which are 40ha or more. The larger sites tend to be in the countryside on the edge of the borough, and whilst publicly accessible, may not be as accessible to all, compared to smaller urban open spaces equivalent to parks, gardens and amenity spaces.*
- *Quality Standards: For the natural greenspace sites audited as part of the Assessment, quality scores ranged from 36 – 82% (Poor to Very Good) averaging 55% (Fair). The greatest number of sites fall into the Poor and Fair category.*
- *Value Standards: Value scores for the borough’s natural greenspace sites ranged from 14% – 60% (Low to High).*

14.16 *In light of these findings and consistent with Policies OS2 and GI3, new developments should ensure they mitigate against placing greater pressures on existing natural greenspace. Ideally, developments should be located close to areas of accessible natural greenspace. Therefore, new on-site natural greenspace provision in order to provide wildlife value should be considered where this is practical and can be designed in to minimise future management and maintenance concerns. Alternatively, contributions towards access improvements to larger areas of natural green space; improvements to existing natural open space close to the development; or to convert other types of open space for wildlife value will be sought in accordance with the Planning Obligations Annex. Policy GI2 sets out the policy position in relation to development which is close to, or may affect, ancient woodland and/or veteran trees.*

14.17 *The council’s Green Infrastructure SPD and Planning and Climate Change SPD provide further guidance to help applicants make successful applications and to aid the delivery of green infrastructure where required.*

## **Biodiversity Sites**

14.18 To protect and enhance biodiversity and geodiversity, it is important to gain a thorough understanding of habitats and ecological networks. Developers can support an in-depth understanding of local biodiversity sites by:

- a. Identifying, mapping and safeguarding components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national, and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- b. Promoting the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identifying and pursuing opportunities for securing measurable net gains for biodiversity.

## Strategic Policy GI2: Biodiversity Sites

Up-to-date habitat and species surveys and associated reports will be required to accompany planning applications which may affect the areas listed below or sites showing likely ecological value.

If significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated or as last resort compensated then planning permission should be refused.

### Hierarchy of Biodiversity Sites

To ensure a net gain in biodiversity, the following areas and their supporting and connecting habitat will be conserved and enhanced and the council will support their designation and management through Management Plans:

#### 1. Internationally designated sites:

- Special Area of Conservation (SAC);
- Site of Community Importance;
- Priority Natural Habitat or Priority Species Site;
- Special Protection Area (SPA);
- Potential SPA (pSPA);
- Proposed SAC (pSAC);
- Listed and Proposed Ramsar Site;
- Sites identified or required as compensation measures for adverse effects on statutory Internationally designated sites.

#### 2. Nationally designated sites:

- Sites of Special Scientific Interest (SSSI)

International Sites and SSSI will receive the highest level of protection for habitat conservation value in line with national legislation, policy and guidance.

#### 3. National Planning Policy Framework Sites:

- Ancient Woodland, and aged or veteran trees

Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. A buffer zone between development and ancient woodland will be required in line with Natural England Standing Advice.

#### 4. Locally designated sites, and habitats and species outside designated sites:

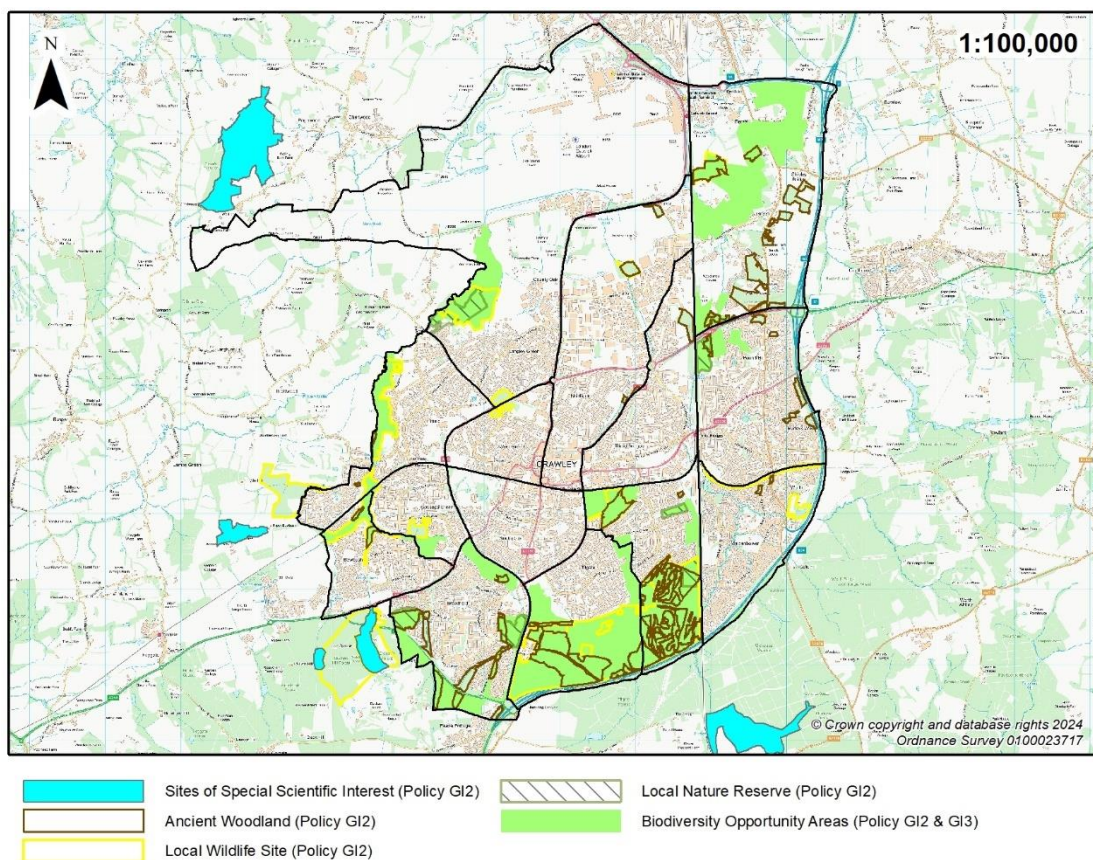
- Local Nature Reserves (LNR);
- Local Wildlife Sites (LWS);
- Nature Improvement Areas;
- Habitats of Principle Importance identified in S41 of the Natural Environment and Rural Communities Act 2006 or Biodiversity Action Plans;
- Biodiversity Opportunity Areas;
- Where Protected Species are present;
- Where Species of Principal Importance are present, as identified in S41 of the Natural Environment and Rural Communities Act 2006.

### **Reasoned Justification**

14.19 *As a public body, Crawley Borough Council has a duty to have regard to the conservation of biodiversity through the proper exercising of all its functions. This is a*

statutory function set out in Section 40 of the Natural Environment and Rural Communities Act, 2006.

- 14.20 This means that the consideration of biodiversity must be embedded in planning policy which should be making a contribution to the commitments set out in Biodiversity 2020: A Strategy for England's Wildlife and Ecosystems Services. The ambition is to halt overall loss of England's biodiversity by 2020 and in the longer term, move from a position of net biodiversity loss to net gain.
- 14.21 To support this ambition the Local Plan Map identifies components of Crawley's ecological network. This ensures that biodiversity is considered, from protection of habitats and species to identifying opportunities to enhance biodiversity.
- 14.22 As of 2018, ancient woodland covers 197.68 ha (4.40%) of the borough, Deciduous woodland 478.56 ha (10.64%), Ghyll woodland 25.49 ha (0.57%), lowland heathland 0.83 ha (0.02%), traditional orchard 0.32 ha (0.01%) and wood-pasture & parkland covers 41.74 ha (0.93%). Ancient Woodlands are valuable as a biodiversity resource for their diversity of species and longevity as woodland. Areas of ancient woodland are identified on the Local Plan Map and protected by national policy. As ancient woodland and ancient or veteran trees are irreplaceable, discussions over possible compensation should not form part of the assessment to determine whether the exceptional benefits of the development proposal outweigh the loss. Ancient wood pasture and historic parkland should receive the same consideration as other forms of ancient woodland. The protection of the whole habitat is necessary even though tree cover may be comparatively sparse. Development on open space between trees in an area of ancient wood pasture or historic parkland should not be permitted.



**Figure 24: Crawley's Biodiversity and Nature Conservation Sites**

- 14.23 *A minimum 15 metre buffer should be maintained between a development and the ancient woodland (as advised by a full ecological survey), including through the construction phase, in accordance with the Natural England Standing Advice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance. Where it is deemed that there is going to be unavoidable residual damage or loss to ancient woodland, the measures taken to compensate for this must be of a scale and quality commensurate with the loss of this irreplaceable habitat. Where ancient woodland is to be replaced by new woodland, this should aim to create 30 hectares of new woodland for every hectare lost.*
- 14.24 *The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site<sup>137</sup>.*
- 14.25 *There are no international or nationally designated sites within Crawley. However, there are sites located close to the borough boundaries and those which could be affected by the impacts of new developments from within the borough. A Habitats Regulations Appropriate Assessment has been carried out in relation to the Local Plan and its potential impacts on the following internationally designated sites:*
- *Ashdown Forest SAC;*
  - *Ashdown Forest SPA;*
  - *Mole Gap to Reigate Escarpment SAC;*
  - *South West London Waterbodies SPA;*
  - *South West London Waterbodies Ramsar;*
  - *Arun Valley SPA;*
  - *Arun Valley SAC;*
  - *Arun Valley Ramsar; and*
  - *The Mens SAC.*
- 14.26 *Buchan Hill Ponds SSSI is located immediately on the boundary of the borough within Horsham District. To the west of the borough, also in Horsham, is House Copse, which is also a designated SSSI. This site is approximately 335 meters from the boundary with Crawley. To the north of the borough, within Mole Valley, is Glover's Wood SSSI (approximately 80 metres from the boundary with Crawley) and to the south of the borough, in Mid Sussex, is Worth Forest SSSI (approximately 840 metres from the boundary with Crawley).*
- 14.27 *Within Crawley, there are currently 12 designated Local Wildlife Sites, formerly known as Sites of Nature Conservation Importance (SNClIs), covering ~~327.82~~ 327.19 hectares in total. These are identified, designated and reviewed by an independent panel of experts, through the Sussex Local Wildlife Sites Initiative. This maintains a consistent approach to designating local sites of importance for biodiversity across a pan-Sussex geography (East and West Sussex counties). Eight sites are council-owned while four are privately-owned and managed.*
- *Ewhurst Wood*
  - *The Hawth*
  - *Horleyland Wood*
  - *Hyde Hill*
  - *Ifield Brook Wood and Meadows*

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<sup>137</sup> National Planning Policy Framework, paragraph 182 (2021) MHCLG

- *Ifield Mill Pond and Surroundings*
- *Rowley Wood*
- *Tilgate Park*
- *Willoughby Fields*
- *Woldhurstlea Wood*
- *Worth Meadows*
- *Worth Way*

*The Hyde Hill Local Wildlife Site crosses the boundary with Horsham. Buchan Country Park, Horsham, on the boundary with Crawley, is also designated as a Local Wildlife Site.*

- 14.28 *Biodiversity Opportunity Areas have been identified throughout the south east and are the regional priority areas of opportunity for restoration and creation of Biodiversity Action Plan (BAP) habitats. Within the borough, this includes the Urban Habitat Action Plan (HAP) which highlights the rich biodiversity in Sussex's urban areas as well as the Deciduous Woodland, Lowland Heathland, and Lowland Meadows HAPs. The council will continue to work collaboratively with partners to protect and improve the natural environment based on locally identified priorities and evidence, including through identifying priorities, and securing improvements, as part of the Local Nature Recovery Strategies (LNRS).*

### **Biodiversity Net Gain**

- 14.29 The council is committed to halting the overall decline in biodiversity by ensuring that development minimises impacts on biodiversity and provides net gains including establishing coherent ecological networks that are more resilient to current and future pressures.
- 14.30 The government is introducing a “net gain” principle into statutory policy. It has published a Biodiversity Metric to support the implementation of the Environment Act 2021 mandatory Biodiversity Net Gain requirement. This is subject to updates and refinements by Defra. The Metric is designed to be used with Ecological Surveys to acknowledge pre, current and post development biodiversity baselines. Biodiversity baselines will date back to January 2020. This net gain principle works alongside, and does not replace the existing system of ecological protections for sites, habitats and species. The Environment Act mandates the use of the Metric to calculate Biodiversity Net Gain in planning applications.

### **Tree and Landscape Character Planting**

- 14.31 Trees and soft landscaping makes an important contribution to the character and appearance of the borough and are beneficial in other ways including supporting biodiversity. Additional tree and/or landscape planting will be required to mitigate the visual impact of the intensification of buildings, hard surfacing parking and boundary treatments as well as support the net gain in biodiversity targets. General policy requirements for all new developments regarding landscaping is set out in Policy DD1.
- 14.32 Good quality tree and landscape planting can secure multiple benefits, wider than visual improvements, particularly where this involves habitat creation, through providing one or all of cover, food or water to a targeted species; choosing species for their air quality improvement properties; and where species provide mitigation and adaptation for the impacts of climate change. To maximise the multiple benefits from landscape planting, detailed consideration is necessary as part of the landscape design of development schemes and sufficient funding for initial planting and ongoing maintenance is required.



- 14.33 The preservation of existing sites is preferable to the development of new habitat – this is covered by Policies GI1 and GI2. The protection and enhancement of Structural Landscaping is covered by Policy CL6. The retention or replacement of existing trees is covered by Policy DD4.

### Policy GI3: Biodiversity and Net Gain

Development whose primary objective is to conserve or enhance biodiversity will be supported.

All development proposals will be expected to incorporate features to encourage biodiversity and enhance existing features of nature conservation value within and around the development.

Development proposals will be required to demonstrate how the scheme will meet the government’s requirement for securing measurable ‘net gains’ in biodiversity, including information calculating the current biodiversity value of the site. [Biodiversity Net Gain is in addition to existing habitats and species protections. In delivering Biodiversity Net Gain for development proposals, the mitigation hierarchy should be followed.](#)

As a minimum, all development proposals will need to achieve a net gain for biodiversity in accordance with government expectations<sup>138</sup>, 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.

Developments that are of a smaller size should look to use [the Small Sites Biodiversity metric.](#)

[Developments on sites with low \(or zero\) existing biodiversity baseline should use](#) the Urban Greening Factor criteria to achieve appropriate improvements and gains to the environment.

In the first instance ‘net gains’ [units](#) should be sought on-site. If on-site is not feasible then [delivery of](#) off-site ‘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. [Appropriate management and maintenance measures should be in place throughout and following development.](#)

Applicants will also be required to submit their baseline findings and proposals to the Sussex Biodiversity Record Centre in an appropriate format.

Applications should include consideration to securing benefits for the purposes of pollination and biodiversity as part of their on-site landscaping schemes. This can include consideration for green roofs and green walls, where soft landscaping at ground level is limited.

Discussions with Gatwick Airport Limited in relation to planting and management to minimise the risk of bird strike should be held at an early stage of landscape design, in accordance with Policy DD5.

<sup>138</sup> The Environment Act 2021

Developers may be required to commit to providing an Ecological Management Plan/Biodiversity Offset Management Plan for the development site. This will usually apply to larger developments or where a development site is close to a Local Wildlife Site.

Landscape proposals for residential development should contribute to the character and appearance of the town by including at least one new tree, or equivalent soft landscaping, for each new dwelling, of an appropriate species and planted in an appropriate location. The tree and soft landscaping planting requirements would normally be expected to be met within the development site. Where the local planning authority agrees that this is not feasible or desirable, commuted sums will be sought in lieu on a per tree, or equivalent alternative habitat basis, taking account of constraints to planting. The approach would enable the green character and appearance of the borough to be maintained through tree and soft landscape planting on appropriate and available land.

Proposals which would result in significant harm to biodiversity will be refused unless:

- i. this can be avoided by locating the development on an alternative part of the site with less harmful impact; or
- ii. the harm can be adequately mitigated, or, as a last resort, compensated for.

Compensation should consider losses of all the benefits provided by the natural environment.

### **Reasoned Justification**

- 14.34 *Much biodiversity is outside designated areas. Planning policies and decisions should encourage multiple benefits from both urban and rural land, including through mixed-use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside.*
- 14.35 *It is important that planning decisions take into account biodiversity by ensuring that decisions are based on sufficient information. It's important to note that the pre-development biodiversity value (baseline) is the baseline before any onsite activity is carried out. Detailed ecological assessments based on the latest ecological records and up to date surveys must be carried out on all new developments and the impacts on the loss of biodiversity must be assessed. Proposals need to be put forward that will either result in gains to biodiversity so that developments will deliver an overall net gain in biodiversity, or mitigation proposals (including where involving another site) need to be put forward that will achieve a net gain in biodiversity. Moreover, the proposals need to ensure that the net gains in biodiversity will be permanent, all other things being equal. For example, if planting to increase pollinator plants is proposed, it is essential that plans are included to maintain and renew the plants over the long term.*
- 14.36 *Simple definitions of environmental loss as being just the impact upon wild species or biodiversity are inadequate. Development can generate multiple impacts either directly on environmental assets or mediated through environmental impacts: wild species, recreation and related physical and mental health benefits; water quality and flooding; air pollution emissions and greenhouse gases, etc. It is the loss of benefit value generated by development which should be compensated for. Those whose activities give rise to the environmental damage should pay the associated costs of compensation.*
- 14.37 *In order to calculate the net gain in biodiversity required by new development, it will be necessary to quantify the financial resources needed for the maintenance, restoration and enhancement of ecosystems and natural capital in order to deliver multiple objectives for biodiversity, landscape, the historic environment, water, soil, climate, air*

quality, flood management and other ecosystem services. The Defra Biodiversity Metric will be expected to be used when quantifying biodiversity value of a site, to ensure consistency. There will be two metrics, a small metric for smaller developments and the standard metric. This should be submitted alongside planning applications as a full completed Metric tool, which allows interrogation into the data inputs and assumptions. This should be supported by an assessment undertaken by an appropriate expert ecologist for any known or likely protected or priority species or habitats. The Planning Obligations Annex confirms the government's guidance and best practice from Natural England will be used to implement this requirement to development proposals in Crawley. Off-site financial provision, or alternative, will be delivered via an identified strategic mechanism for net gain, anticipated to be set out in national guidance. Off-site provisions for Net Gain will need to demonstrate that Gains will be secured for at least 30 years through agreements or conditions.

- 14.38 *Crawley is a tightly constrained borough and developments must seek to optimise biodiversity gains. Policy G13 requires all sites to deliver net gain irrespective of their size or current provisioning. The requirement for net gain to be sought across the borough will result in biodiversity being provided in areas that have a current deficit. The Urban Greening Factor (UGF) model can be used to help aid in the provisioning of appropriate green provision and materials for developments. The UGF criteria provides the opportunity for improvements to nature, habitats and green provisions that are suitable for the borough being achieved on all sites. It includes incorporating surface cover types such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage into new development schemes, dependent on the site's characteristics and development use. In order to achieve the best outcomes, this should be considered at the earliest stage of development design possible. Further guidance will be provided by the council.*
- 14.39 *In directing contributions and recommendations for enhancements and improvements for achieving biodiversity net gain at a local and county level and for individual site proposals, advice and recommendations may include future West Sussex action plans or strategies (including the Local Nature Recovery Strategy), those produced by or on behalf of the Sussex Biodiversity Record Centre, Crawley Borough Council, and/or the Local Nature Partnership (LNP). The council will work closely with the LNP covering Crawley to prioritise resources towards the improvements and habitat creation which offers the most benefits for Crawley and the Sussex High Weald. Ongoing monitoring will be essential in order to measure the actual effects of Biodiversity Net Gain. Sussex Biodiversity Record Centre maintains the biodiversity data for the local authorities across the whole of Sussex. Applicants should provide the Record Centre with the information relating to their site in a usable format.*
- 14.40 *The Defra Biodiversity Metric lists different types of urban habitat types. The most appropriate types of habitats for developers to provide in landscape schemes from the outset or through compensation where an appropriate number of biodiversity units is provided, include: allotments, artificial lake or pond, bioswale, brown roof, cemeteries and churchyards, extensive green roof, façade-bound green wall, ground based green wall, ground level planters, intensive green roof, introduced shrub, amenity grassland, open mosaic habitats on previously developed land, orchard, rain garden, street tree, suburban/mosaic of developed/natural surface, vegetated garden, woodland.*
- 14.41 *The government's National Pollinator Strategy for England (2014) sets out a 10 year plan to help pollinating insects survive and thrive across England. There are at least 1500 species of insect pollinators in the UK. The West Sussex Pollinator Action Plan was published in December 2018 to help reduce the threat to bees and other pollinators that*

are vital to crops, gardens and countryside, as well as improving awareness and increasing the number of pollinator habitats in West Sussex<sup>139</sup>. Pollinators face many pressures that with good management can be mitigated against including:

- Habitat loss;
- Pests and diseases;
- Competition from invasive species;
- Extreme weather;
- Climate change; and
- Use of some pesticides.

Some of these management measures could be incorporated into landscape schemes for new development.

- 14.42 *There may be an overlap with on-site tree planting and tree/landscape habitat contributions for each new dwelling, as covered by this Policy, and this can be considered as part of the net gain calculations where the species chosen are agreed as appropriate for this purpose. The Defra Biodiversity Metric enables soft landscaping and trees to be quantified into Biodiversity Units. However, replacement trees (Policy DD4) will not count towards the net gain; indeed they may involve a net loss of biodiversity due to the loss of important habitats provided by mature trees, and the potential for new trees to fail.*
- 14.43 *When planting a tree, the existing sewerage and water supply infrastructure should be taken into account, as well as the choice of appropriate tree species for the ground conditions and environment. The Green Infrastructure SPD (Appendix 6) lists appropriate species that could be planted in Crawley. Where possible, UK sourced and grown tree stock should be used to support biodiversity and resilience. Site-specifics such as ground conditions, light/sunlight and proximity to buildings and paving/footpaths must be taken into account to ensure the correct species is used for the location and purpose and does not result in nuisance or early removal of the tree. In addition, other matters for consideration include climate change resilience, pollination opportunities, carbon storage, air quality management, street use and appropriate species to avoid bird strike on aircraft.*
- 14.44 *Where character landscape planting as part of the biodiversity net gain is to be provided on-site in lieu of on-site new tree planting, the planting scheme should be agreed with the council as constituting an equivalent visual contribution to a one tree per dwelling, and must be justified on a case-by-case basis considering the context and design of the scheme, taking into account the multiple benefits provided by trees (including air quality, carbon storage, shading, character, maturity and biodiversity).*
- 14.45 *The cost of off-site planting by the council, in lieu of provision on-site, will be based on the cost of a sixteen to eighteen centimetre girth tree measured at 1.5m off the ground, planting, sundries and watering over a five year period to ensure that the tree becomes established. This is set out in the Planning Obligations Annex. The council will direct this contribution toward provision of new tree planting within a suitable location in the borough or an equivalent alternative landscape habitat. The Manor Royal Design Guide SPD sets out tree planting requirements for sites in Manor Royal.*
- 14.46 *The developer and/or site manager must ensure the relevant management plan is handed over and explained to any maintenance company or staff responsible for maintaining landscaping and/or gardens and buildings. A simplified version should also*

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<sup>139</sup> Pollinator Action Plan 2019 – 2022 (December 2018) WSCC <https://www.westsussex.gov.uk/about-the-council/policies-and-reports/environment-planning-and-waste-policy-and-reports/pollinator-action-plan/>

*be provided for householders and other occupiers, explaining how biodiversity is being protected and encouraged on the site. This commitment will form part of the obligations on a planning permission and will be secured by way of a S106 legal agreement and/or planning condition.*

### **Local Green Space**

14.47 The NPPF empowers local communities to promote the designation of green areas of particular importance for special protection as a Local Green Space.

#### **Strategic Policy GI4: Local Green Space**

The following area is designated as Local Green Space:

##### Ifield Brook Meadows and Rusper Road Playing Fields

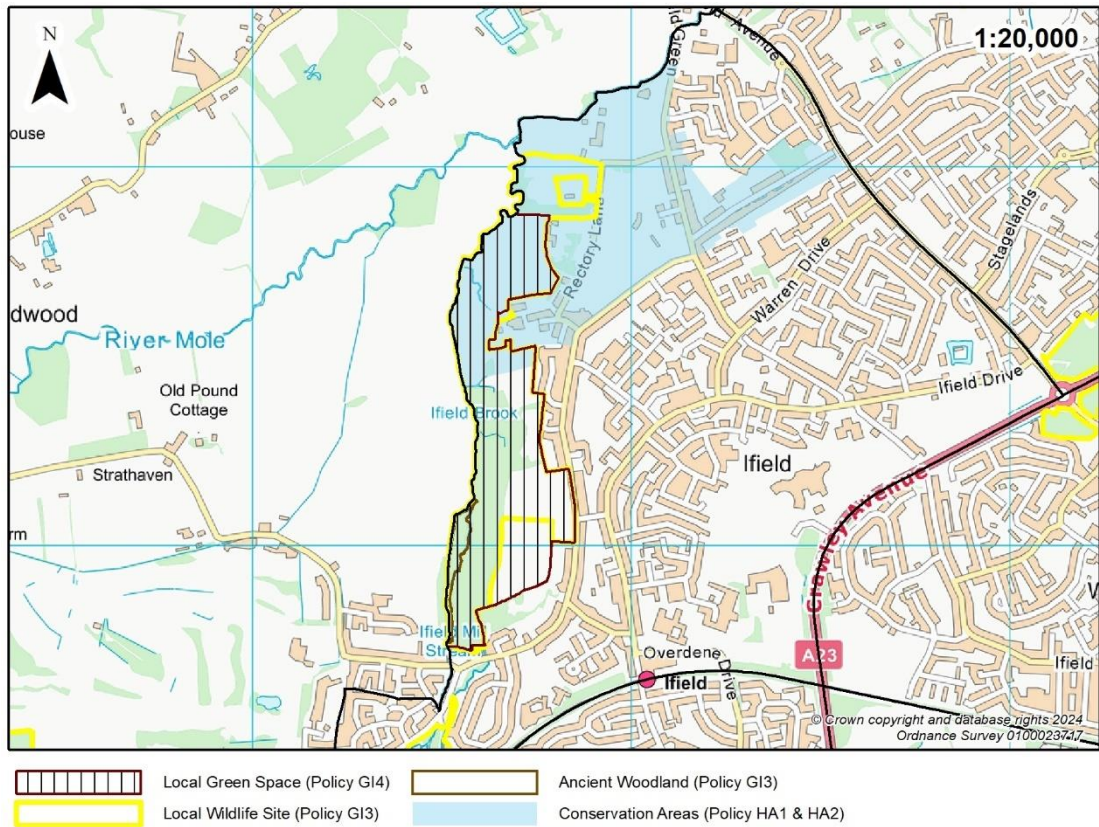
This area is designated due to its value to the local community and local significance in its function as an area for enjoyment of recreation, visual amenity, tranquillity, wildlife, heritage, and highly accessible countryside close to the urban area.

The above area will be safeguarded from development other than in very special circumstances or where the development is to enhance Local Green Space functions, for example, through improvements to access, recreation and wildlife.

### **Reasoned Justification**

14.48 *Public consultations have consistently shown that Ifield Brook Meadows and Rusper Road Playing Fields should be protected because of their special value to the local community. The Meadows are an important site of nature conservation with distinctive vegetation and wildlife. The northern part of the Meadows is of historic importance, forming part of the Ifield Village Conservation Area, contributing to the setting of the village and church. These elements make this area unique and local in character.*

14.49 *The presumption in favour of sustainable development does not apply to Local Green Spaces. Proposals affecting the designated Local Green Space should be consistent with national Green Belt Policy.*



**Figure 25: Ifield Brook Meadows and Rusper Road Playing Fields Local Green Space**

## Sustainable Design & Construction

- 15.1 Crawley Borough Council is committed to supporting the legally binding national carbon reduction targets and the borough being net zero by 2050; this is to be achieved by aligning with the national zero carbon agenda in planning policies, by engaging with local businesses and communities and achieving net zero greenhouse gas emissions from council activities by 2040 at the latest<sup>140</sup>.

### Chapter Content

- 15.2 This chapter sets out policies to guide the relationship between development proposals and local, national and global environmental protection.

### The Key Issues

- 15.3 Crawley as a dense urban area has a high level of carbon emissions and anticipated development, which will contribute towards the causes of climate change. In addition, it is also identified as an area of radiant energy and subject to serious water stress. Therefore, its adaptation towards climate change will provide opportunities to harness and threats to be addressed.
- 15.4 **A Compact Urban Borough:** The town was developed as a new town in the 1950s, and all development followed the neighbourhood principle which provides a sustainable pattern. This ethos is still central to the way the town is planned today and provides an increased opportunity for local energy production on a network basis. However, the compact nature of the borough and changing climate patterns are expected to increase the frequency and severity of heatwave events. Such events are likely to be of increased severity in Crawley due to the relatively high levels of radiant energy the area receives, combined with the urban heat island effect typical of compact urban areas.
- 15.5 **Water Stress and Water Neutrality:** The South East, including Crawley, is an area of serious water stress, whereby demand for water exceeds the available supply. Separately, the Sussex North Water Resource Zone (WRZ), which includes much of Crawley, has been identified as being subject to water neutrality requirements in order to avoid harm to international designated sites. This means that development must be made water neutral to ensure that it does not increase demand for water above current rates of abstraction. As a result of these designations, development must demonstrate greater water efficiency, and where required, water neutrality.
- 15.6 **Gatwick Diamond:** Crawley and its surrounds have been identified as an area of significant change and growth. Given its geographical location at the heart of the Gatwick Diamond and the significant amount of both commercial and residential growth expected throughout the life of the Local Plan, there is a need to consider the impact on the local environment and to plan for sustainable growth. This is exacerbated by the resultant in-commuting to the area and regional focus of growth that would otherwise be experienced across a number of authorities. This is also supported by the fact that the main commercial area, Manor Royal is currently responsible for 28% of the town's carbon emissions. This will increase if growth for the Gatwick Diamond area is focused in this area.
- 15.7 **Gatwick Airport:** Given the proximity of the international airport, there are specific local impacts that affect how climate change is dealt with. From the increase in traffic

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<sup>140</sup> Climate Emergency Declaration' (2019) CBC; 'Amending the targets within the Climate Emergency Action Plan' (2021) CBC.

movements in the local area, to the restrictions in terms of building heights and consideration of potential future airport expansion, the safe operation of the airport requires the Local Authority to act differently than it would otherwise. For example, Crawley has a reduced opportunity of using wind turbines in countryside adjacent to the airport, meaning that other renewable technologies must be considered instead. Gatwick Airport's published Scope 1 and 2 emissions contribute 24% of the business and commercial emissions in Crawley borough and 13% of total emissions (excluding aircraft movement, as these are considered on a national level).

- 15.8 Crawley Borough Council declared a Climate Emergency by a unanimous vote of Full Council on 17 July 2019. The motion declared that the council 'should commit to aim for zero carbon emissions as soon as possible and, in doing so, to encourage local residents and businesses to do the same'. The motion further included a pledge 'to aim to reduce carbon emissions generated by Crawley Borough Council activities by at least 45% by 2030 and to zero by 2050', and a subsequent unanimous resolution of Full Council on 15 December 2021 amended this so as 'to pledge to reduce carbon emissions by at least 50% and as close to net zero as possible by 2030, and to reach net zero by 2040 at the very latest'. It included a commitment to work with 'other councils and partners to determine and implement best practice methods to reduce carbon emissions and so limit Global Heating to less than 1.5 degrees Celsius'<sup>141</sup>.

## Local Plan Policies

### Sustainable Design and Construction

- 15.9 The government has pursued progressive improvements to the environmental sustainability and energy efficiency of dwellings through changes to the building regulations and the development of national technical standards. The council has a long term aspiration for the borough to be net zero by 2050 and, therefore, supports the introduction of national standards through Building Regulations. In line with the March 2015 Ministerial Statement, the council recognises Crawley as having the spatial characteristics in place that warrant the stipulation of specific policies in regard to energy and water efficiency and, in regard to water targets, to be able to trigger the use of the tighter operational standards<sup>142</sup>. The need to address climate change at a local level has also been supported throughout consultations for the Local Plan and in its evidence base.
- 15.10 Crawley's compact urban nature combined with the significant levels of development expected over the coming years present an opportunity for Crawley to minimise its greenhouse gas emissions in an efficient manner. Choices made in relation to the layout and scale of new development strongly influences energy consumption. Policies CL3 and CL4 in particular, require major new development use land more sustainably by integrating land uses and transport networks. Currently energy use in buildings makes up a significant portion of the emissions generated within Crawley. Domestic buildings accounted for nearly 25% of Crawley's overall greenhouse gas emissions in 2020, and industrial, commercial and public sector buildings for 33%, with transport accounting for a further 38%<sup>143</sup>. Even before this energy has reached the consumer, energy wasted in the form of transfer and distribution losses has resulted in additional

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<sup>141</sup> 'Climate Emergency Declaration' (2019) CBC; 'Amending the targets within the Climate Emergency Action Plan' (2021) CBC.

<sup>142</sup> Planning Update March 2015: Written Ministerial Statement (March 2015)

<sup>143</sup> UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2020 (2022) Department for Business, Energy & Industrial Strategy (hereafter BEIS). The residual 4% of emissions came from agriculture and waste management.



emissions. However, due to the borough’s characteristics this wasted energy can be captured for the benefit of others, and this will result in Crawley’s overall emissions being reduced.

- 15.11 Crawley was mainly constructed between 1950 and 1990, when sustainable development was not a priority, and many of the town’s buildings consequently perform poorly in terms of their energy efficiency. Added to this fuel poverty has affected between one in twenty and one in twelve Crawley households between 2011-16. The improvement of existing buildings to ensure everyone has access to affordable warmth is, therefore, a high priority.
- 15.12 Actions to reduce emissions from energy use in buildings are most cost effective when undertaken during construction or renovation works. As such, development projects present the most appropriate and effective opportunity to mitigate the climate change impact of the borough. Therefore, the following hierarchy should be adopted by all development within the borough:
  - Be Lean – *use less energy*
  - Be Clean – *improve efficiency of energy supply*
  - Be Green – *use renewable and low carbon energy sources.*
 This hierarchy is widely recognised, and reflects the fact that some aspects of a building’s environmental performance are more fundamental and harder to retrofit at a later date, while others are more amenable to change during the life of the building.
- 15.13 A number of objectives have been established that all developments are expected to achieve to ensure the borough remains a sustainable place in the coming years.

### Strategic Policy SDC1: Sustainable Design and Construction

The following requirements and standards set the strategic framework for the mitigation and adaptation of climate change as part of the development process within Crawley.

#### CLIMATE CHANGE MITIGATION

Development will be required to mitigate climate change in accordance with the following hierarchy:

<b>Be Lean</b>
<p>Where <b>new-build dwellings</b> may be subject to Part L of the 2013 Edition of the 2010 Building Regulations for the purposes of Building Regulations compliance, the relevant Target Emission Rate (TER) should be achieved using building fabric and energy efficiency measures alone.</p> <p>The ‘<b>Be Green</b>’ requirement set out below will require further emissions reductions, which may be achieved using low/zero carbon technologies.</p>
<p><b>Residential developments including 10 or more new homes or incorporating a site area of 0.5 hectares or more</b> will also be required to implement a recognised quality regime to ensure that ‘as built’ environmental performance matches the calculated design performance.</p>
<p><b>New buildings other than dwellings</b> which may be subject to Part L2A of the 2013 Edition of the 2010 Building Regulations for the purposes of Building Regulations compliance should achieve the relevant Target Emission Rate (TER) through fabric and energy efficiency measures alone.</p>

The '**Be Green**' requirement set out below will require further emissions reductions, which may be achieved using low/zero carbon technologies.

**Other developments** meeting the thresholds for submission of a Sustainability Statement (detailed below) should detail their consideration of the potential for building fabric and energy efficiency measures, and any specific measures proposed.

These proposals will usually trigger building regulations requirements, and proposals for meeting these should be set out.

**All developments** required to submit a Sustainability Statement should be designed and implemented as far as possible to minimise the amount of carbon emitted throughout the development process and to limit the loss of any existing embedded carbon onsite, including through consideration of the feasibility of retrofitting and re-using existing buildings. The incorporation of this approach within the development process should be detailed in the Sustainability Statement.

### **Be Clean**

Developments should consider and respond to the potential to supply their energy needs, particularly for electricity, heating and cooling, by means of decentralised energy generation in accordance with **Policy SDC2**.

### **Be Green**

**All developments** required to submit a Sustainability Statement should use renewable and low carbon energy technologies, where appropriate, or where required to meet specific emissions standards for new buildings. This should include use of available roof-space for solar PV where possible.

**New-build dwellings** will be required to meet whichever of the following standards is more efficient in respect of carbon dioxide emissions:

- a) a reduction of at least 19% against the Target Emission Rate (TER) set by the 2013 Edition of the 2010 Building Regulations (Part L);
- b) a new mandatory national emissions standard, introduced via Building Regulations or otherwise.

**New buildings other than dwellings** will be required to undergo BREEAM certification and achieve the 'minimum standards' for BREEAM Excellent within the Energy and Water categories, except where it is demonstrated that this is not technically feasible.

## **CLIMATE CHANGE ADAPTATION**

**All developments** required to submit a Sustainability Statement should contribute to the tackling of the serious water stress in the borough in accordance with **Policy SDC3**. All development within the Sussex North Water Resource Zone will be required to achieve water neutrality in accordance with **Policy SDC4**.

**New dwellings, other new buildings, and material changes of use** (as defined by the Building Regulations) will be required to cope with future temperature extremes, and mitigate the potential of the development to increase the impact of heatwave effects, in accordance with the cooling hierarchy:

- Minimise internal heat generation through energy efficient design;
- Reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls;

- Design to enable passive ventilation (e.g. cross ventilation);
- Provide mechanical ventilation;
- Provide active cooling (ensuring they are the lowest carbon options).

### **SUSTAINABILITY STATEMENT THRESHOLDS**

All proposals involving the types of development listed below must be supported by a Sustainability Statement detailing the performance of the development against these requirements, including proposed approaches to achieving relevant Building Regulations requirements, minimising the loss of embodied carbon, and the avoidance of overheating:

- Creation of a dwelling (including by conversion);
- Creation of 100sqm or more of new-build floorspace;
- Extension of a building which already comprises 1000sqm or more;
- The following changes of use, where cumulatively affecting 100sqm or more:
  - Non-E-class to E-class;
  - Non-C-class to C-class;
  - Non-F-class to F-class.

### **RENEWABLE AND LOW CARBON ENERGY DEVELOPMENTS**

Proposals for renewable and low carbon energy installations and infrastructure of a type and scale appropriate to the character of the borough (including the presence of Gatwick Airport) will be supported where any adverse impacts are (or can be made) acceptable.

Further details on how the council will apply this policy can be found in the Planning and Climate Change SPD.

### **Reasoned Justification**

- 15.14 *The NPPF highlights the need for planning to address and adapt to climate change, encourage the transition to a low carbon future, reduce greenhouse gas emissions, and support renewable and low carbon energy<sup>144</sup>. In addition, it also requires local plans to pursue ‘opportunities for net gains’ across the economic, social and environmental objectives which define sustainable development<sup>145</sup>.*
- 15.15 *A number of borough-wide issues and opportunities have been identified in the evidence base and these form the objectives that all development is expected to address in this Policy.*
- 15.16 *In accordance with the ‘Be Lean’ element of the energy hierarchy, the Policy requires development to take an active approach to minimising a development’s need to consume energy. This is paramount to tackling climate change and intrinsically linked with the NPPF. It also reflects the government’s understanding – set out in the Future Homes Standard consultation and the 2021 update to Building Regulations approved document L – that primary energy consumption will increasingly become the key metric for new buildings, as emissions move closer to net zero<sup>146</sup>.*
- 15.17 *The best and most economical opportunity for buildings to achieve advanced standards in energy efficiency is when they are first constructed. In recognition of this the Policy requires new buildings to be designed so as to be capable of meeting current Building*

<sup>144</sup> National Planning Policy Framework, paragraph 152 (2021) MHCLG

<sup>145</sup> National Planning Policy Framework, paragraphs 8 and 32 (2021) MHCLG

<sup>146</sup> The Future Homes Standard - 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings (2019), MHCLG; Building Regulations Approved Document L (2021 edition) DLUHC.

*Regulations emissions standards even before any low or zero carbon technologies have been included in the design. In order to address the recognised ‘performance gap’ between the modelled performance of buildings and their actual performance, the policy further requires applications for major residential developments to demonstrate that they have acted to ensure that sustainability and construction standards specified at the design stage are carried through in the implementation of the development.*

- 15.18 *Existing buildings within the borough are responsible for a large proportion of carbon emissions so improvements to all of these buildings are essential to curb Crawley’s emissions over the Plan period. Therefore, the Policy requirement to consider and detail energy efficiency measures relates to all developments meeting certain thresholds, including alterations and extensions to existing buildings. This will also help to tackle the high level of local fuel poverty by ensuring affordable warmth within the borough.*
- 15.19 *Existing buildings contain embedded carbon; this is carbon that was emitted to construct it. It is vital that this already emitted carbon is not wasted through the needless demolition of structures so applications will be required to demonstrate how onsite embedded carbon has been retained.*
- 15.20 *Due to Crawley’s compact urban nature, the use of district energy networks as part of the ‘Be Clean’ element of the energy hierarchy, can ensure a low carbon future for the borough as required by the NPPF. Ensuring development utilises these networks is of particular importance to ensure they are a success.*
- 15.21 *Crawley Borough Council has assessed<sup>147</sup> the likely opportunities and constraints of a number of technologies across the borough. High radiant and district energy networks have been identified as the most suitable renewable energy resources available. Therefore, renewable and low carbon energy technologies should be utilised where appropriate.*
- 15.22 *In order to provide a focus for climate change mitigation measures within new developments, the policy sets out baseline environmental performance standards as part of the ‘Be Green’ element of the energy hierarchy. New-build dwellings will be required to achieve standards for CO<sub>2</sub> emissions equivalent to Level 4 of the discontinued Code for Sustainable Homes, except where more stringent national requirements are applicable<sup>148</sup>. The Code Level 4 equivalent represents a recognised standard which is consistent with the Ministerial Statement of 25 March 2015, and with the government’s policy for national technical standards<sup>149</sup>. The council will expect that where proposals for new dwellings are seeking to demonstrate compliance with the energy and emissions standards of Policy SDC1 on the basis that they may be subject to Part L of the 2013 edition of the 2010 Building Regulations, SAP 10.0 carbon factors will be used in the assessment. The use of other factors will require justification. New non-residential buildings are meanwhile required to meet the minimum standards for BREEAM ‘excellent’ within the Energy category.*
- 15.23 *The Policy further provides a framework for adaptation to the effects of climate change. The borough is identified as falling within an area of serious water stress and as such development is expected to address this issue by achieving a better than standard level<sup>150</sup>. These requirements are distinct from the requirement set out in Policy SDC4 for development within the Sussex North Water Resource Zone to be water neutral in order*

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<sup>147</sup> Decentralised Energy Study (2011) HurleyPalmerFlatt

<sup>148</sup> The Future Homes Standard (2019), MHCLG.

<sup>149</sup> Planning Update March 2015: Written Ministerial Statement, March 2015; Government Response to the draft Revised National Planning Policy Framework consultation, p.48 (2018) MHCLG

<sup>150</sup> Water Stressed Areas – Final Classification (July 2013) Environment Agency

*to avoid adverse impact on the Amberley Wild Brooks Site of Special Scientific Interest (SSSI), Pulborough Brooks SSSI and Arun Valley Special Protection Area/Special Area of Conservation and Ramsar site.*

- 15.24 *Crawley is also expected to experience increased frequency and severity of heatwave events. Therefore, ensuring that new buildings will be fit for purpose under greater temperature extremes and minimising the contribution that new developments have towards the urban heat island effect will help manage this impact.*
- 15.25 *This Policy will make a substantial contribution to addressing the requirements set out in the NPPF in respect of climate change, thereby contributing towards the social and environmental objectives defining sustainable development. It will also positively contribute towards the economic objective, as buildings with better environmental performance will have lower energy costs, reduced requirements for retrofitting arising from tighter regulations in the future, and increased marketability<sup>151</sup>. They will also promote investment and employment opportunities in green industries.*

### **District Energy Supply**

- 15.26 A large proportion of Crawley's energy is currently supplied from the National Grid as a centralised system. Power stations generate and distribute this energy across long distances to homes and businesses. This is an inefficient and carbon intensive process due to waste heat and distribution losses. Thus, only around half of the energy used to generate electricity in the UK in 2021 reached end users in the form of electricity<sup>152</sup>. At the same time, nearly half of the energy used in the UK is for heating<sup>153</sup>. Therefore, the use of waste heat from electricity production can help shift energy supply to more affordable lower carbon sustainable sources.
- 15.27 District Energy Networks are designed to distribute energy, such as heating, cooling and electricity across a local area. Networks typically consist of underground pipes and/or cables connecting local energy sources to buildings. Energy sources can include plant that generates electricity and uses the waste heat from this process to supply the network. This is known as Combined Heat and Power (CHP) and is a form of efficient "decentralised" energy production. District Energy Networks can be supplied with many fuel sources, including renewables or waste heat. Energy supplies to District Energy Networks can, therefore, be flexible in regard to using different sources and different technologies both now and in the future.
- 15.28 Crawley, due to its relatively dense and compact urban character, its neighbourhood-based layout, and the quantity of new development expected over the coming years has a significant opportunity to develop District Energy Networks. Such networks could provide affordable warmth to residential and commercial buildings, tackling fuel poverty and improving the borough's energy security. Studies commissioned by the council and other stakeholders have identified a number of Priority Areas within the borough where District Energy Networks are likely to be most viable in the short term<sup>154</sup>. Other strategic developments also provide significant opportunities for the development and implementation of District Energy Networks.

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<sup>151</sup> The Business Case for Green Building: A Review of the Costs and Benefits for Developers, Investors and Occupants (2013) World Green Building Council; Capturing the value of sustainability: Identifying the links between sustainability and business value (2018) UK Green Building Council

<sup>152</sup> Digest of UK Energy Statistics (DUKES) 2021, p.29 (2021) BEIS

<sup>153</sup> Energy Consumption in the UK (ECUK) 2022, Data Table U1 (2022) BEIS

<sup>154</sup> Decentralised Energy Study (2011) HurleyPalmerFlatt; BISEPS Re-Energise: Strategic Energy Opportunities (West Sussex County Council and Manor Royal Business District, 2018); Crawley Civic Centre DHN Concept Design Report (Ramboll, 2018).

## Policy SDC2: District Energy Networks

The development of district energy networks and associated infrastructure is encouraged and should be approved unless it results in significant adverse impacts on the environs.

Priority areas for the delivery of District Energy Networks (DEN) are identified on the Local Plan Map.

Any major development within the borough meeting the thresholds for submitting a Sustainability Statement detailed in Policy SDC1, and all development proposals within a priority area for District Energy Networks that would involve the creation of a new dwelling or the creation of over 1000sqm of internal floorspace, must incorporate an energy strategy developed in accordance with the following hierarchy:

- i. where a network is in place in the immediate area: connect to an existing District Energy Network;
- ii. where a network is not yet in place:
  - a) incorporate within the development a system for supplying energy to any surrounding existing or planned buildings. Any system installed should be compatible with a wider district energy network and developments should ensure that connection to a wider network is facilitated in the future through good design and site layout; or
  - b) include site-wide communal energy systems; or
  - c) demonstrate that the development will be “network ready”, i.e. optimally designed to connect to a District Energy Network on construction or at some point after construction.
- iii. where a development has demonstrated that the preceding options cannot be achieved, due to technical feasibility, or due to site or development specifics, an alternative approach to incorporating low- or zero-carbon technology energy may be justified, on a case-by-case basis. These developments will be required to supply a proportion of their regulated energy needs from low- or zero-carbon sources located on or near the site as follows:
  - a) For major developments within a DEN priority area: at least 20%;
  - b) For major developments outside a DEN priority area, or minor developments within a DEN priority area including the creation of a new dwelling: at least 10%.

Where a connection to an existing District Energy Network is proposed, the council may secure the implementation of this by means of a planning obligation.

All development within the categories identified above must be supported through the submission of a Sustainability Statement in compliance with the Planning and Climate Change SPD.

### **Reasoned Justification**

15.29 *Crawley Borough Council has conducted a thorough assessment of the potential use of decentralised energy networks across the borough. This has included work by West Sussex County Council, the Energy Centre for Sustainable Communities, and HurleyPalmerFlatt consultancy.*

15.30 *When considering the opportunities for reducing CO<sub>2</sub> emissions through the supply of low carbon heat, District Heating (DH) was identified as an alternative method of supplying heat to buildings, using a network of super insulated pipes to deliver heat to*

multiple buildings from a central heat source, such as a Combined Heat and Power (CHP) plant. A CHP plant is essentially a local, smaller version of a traditional power station but by being combined with heat extract, the overall efficiency is much higher (typically 80% – 85%). Whilst the electrical efficiency of smaller CHP systems is lower than large scale power generation, the overall efficiencies with heat use are much higher resulting in significant CO<sub>2</sub> reductions.

15.31 A ‘heat map’ for Crawley has been created that identifies density of heat demand across the borough, the assessment identified a number of areas where the development of district heating schemes should be actively encouraged:

- *Town Centre/Three Bridges corridor: the council is taking advantage of opportunities in this area, including through the creation of a new energy centre on the Town Hall site which will supply heat and power to a number of nearby developments and locations.*
- *Manor Royal: there is high demand for process heating/cooling as well as space heating in this area and potential to generate and supply low/zero carbon energy locally is being pursued by local stakeholders and businesses as part of the Re-Energise Manor Royal project and the Manor Royal Local Energy Community (LEC).*
- *Forge Wood: there is network potential within this area due to proposals for additional large-scale development and possible linkages with Manor Royal.*
- *K2 Leisure Centre and Land Adjacent to Desmond Anderson Primary School: there is potential to expand the Combined Heat and Power provision at K2 to supply heat and power to the adjoining allocated housing site.*
- *In addition, Policy EC4 allocates land at Gatwick Green, for the development of a Strategic Employment Location for industrial, predominantly logistics, storage and distribution (B8) floorspace. This strategic allocation provides a significant opportunity for the masterplanning of energy generation and consumption, notably through potential for the decentralised supply of heat, cooling and electricity.*

*These areas are identified as Priority Areas on the Local Plan Map. However, District Energy Networks are encouraged throughout the borough, including outside of the identified areas.*

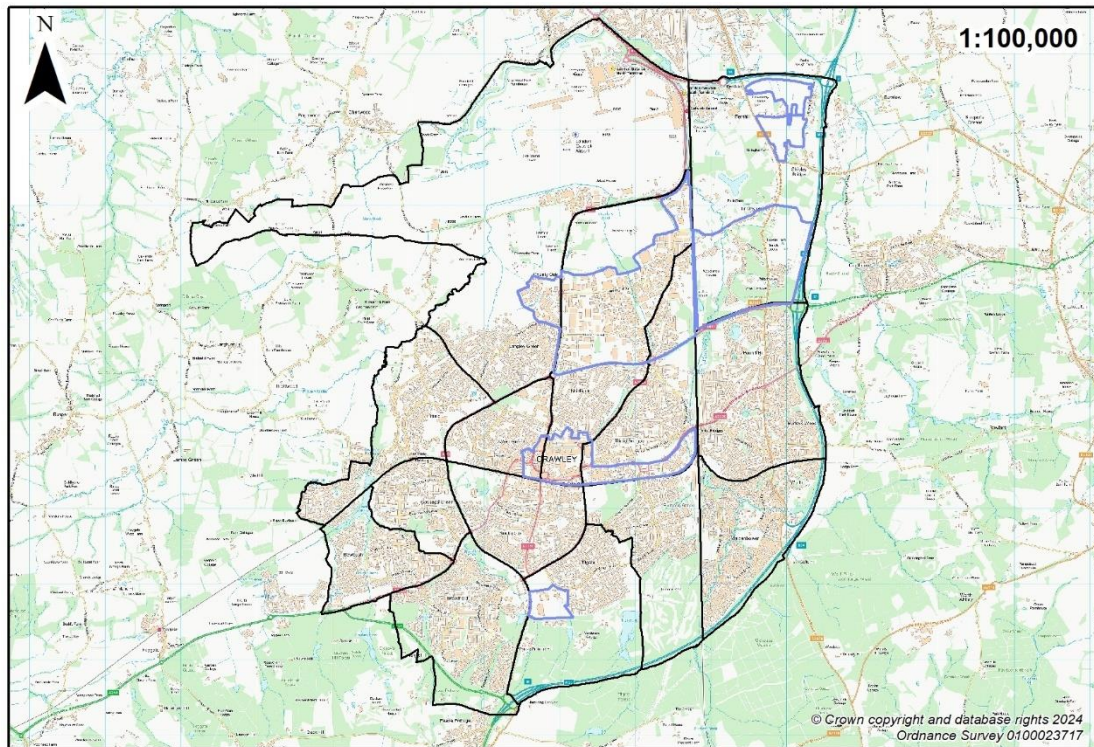
15.32 *The NPPF directs local plans ‘to identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy systems’. This further applies to the goal of ‘co-locating potential heat customers and suppliers’. Further, local planning authorities should ‘expect new developments to comply with any development plan policies on local requirements for decentralised energy supply, unless it can be demonstrated by the applicant, having regard to the type of development involved, that this is not feasible or viable’<sup>155</sup>. Given the complexity of decentralised energy, the council encourages early pre-application discussions.*

15.33 *The approach of seeking to make new dwellings capable of connecting to future DENs is consistent with the approach outlined in the government’s Clean Growth Strategy of April 2018, which announces the intention ‘to consult on strengthening energy performance standards for new and existing homes under building regulations, including futureproofing new homes for low carbon heating systems’<sup>156</sup>.*

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<sup>155</sup> National Planning Policy Framework, paragraphs 151 and 157 (2021) MHCLG

<sup>156</sup> Clean Growth Strategy (2018), BEIS



**Figure 26: Priority Areas for District Energy Networks**

### Tackling Water Stress

- 15.34 Water is an essential resource and has a critical part to play in providing ecosystem services, contributing to the overall health of the population and enabling development needs to be met. The South East, including Crawley, is an area of serious water stress<sup>157</sup>. Water stress is a measure of the level of demand for water (from domestic, business and agricultural users) compared to the available freshwater resources. 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.
- 15.35 Changing climate conditions are expected to further aggravate water stress in Crawley. Drought is expected in increased frequency and severity and will put additional strain on reservoir and groundwater levels. Extreme rainfall events are also expected to become more frequent and to be more severe. Although seemingly counter-intuitive: increased risk of extreme rainfall can actually further aggravate water stress as most of this water does not soak through to recharge groundwater reserves but instead becomes surface water run-off – increasing the risk of flooding.
- 15.36 Water efficiency measures can make a significant contribution to the reduction of water stress. Residential development will need to be water efficient, meeting the optional requirement as identified in Part G of the Building Regulations to utilise no more than 110 litres per person per day (lppd), with non-residential developments expected to meet the BREEAM ‘Excellent’ standard for water. This has been a requirement in Crawley Borough since the adoption of the Local Plan in 2015 and represents the default water

<sup>157</sup> Water Stressed Areas – Final Classification (July 2021) Environment Agency



efficiency standard for development located outside the Sussex North Water Resource Zone (WRZ). Development that is located within the Sussex North WRZ will be subject to water neutrality requirements (Policy SDC4).

### Policy SDC3: Tackling Water Stress

Development will be planned to a high standard of water efficiency to help address serious water stress. Where development is located outside the Sussex North Water Resource Zone, the following requirements apply:

- a) New residential development will be designed to utilise no more than 110 litres of mains supplied water per person per day, as per the Building Regulations optional requirement for tighter water efficiency;
- b) New non-domestic buildings will be designed to meet the minimum standards for BREEAM 'Excellent' within the Water category.

These standards will be required unless superseded by any tighter national standard introduced during the Local Plan period that are applicable in an area of serious water stress.

Non-residential extensions and changes of use which are required to submit a Sustainability Statement in accordance with Policy SDC1 will be required to achieve water efficiencies equivalent to the minimum Water standards for BREEAM 'Excellent', unless this is shown to be unfeasible.

Applicants must demonstrate how they have achieved the requirements of this Policy within their Sustainability Statement as required by Policy SDC1.

#### Reasoned Justification

15.37 *The NPPF requires local planning authorities to make sufficient provision for infrastructure including water supply<sup>158</sup> with plans taking a pro-active approach to mitigating and adapting to climate change, taking into account long term implications, including those for... water supply<sup>159</sup>. Ensuring that new development is highly water efficient and that, where appropriate, it makes use of rainwater harvesting and/or grey water recycling for uses which do not require water to be potable (such as WC flushing), will help to minimise the impact of development on water stress in the region.*

15.38 *The Environment Agency defines a water stressed area as a location where 'the current household demand for water is a high proportion of the current effective rainfall which is available to meet that demand or where the future household demand for water is likely to be a high proportion of the effective rainfall available to meet that demand'. The Thames River Basin District Management Plan 2022<sup>160</sup> identifies the ecological status of the River Mole catchment at Crawley as ranging 'moderate' to 'bad', with 'changes to natural flow and levels of water' identified as a key challenge. Among its management recommendations, as also identified in the Gatwick sub-region Water Cycle Study 2020, is for Local Plans to support tighter levels of water efficiency for residential and non-domestic use. This will support the achieving of 'good' status under the Water Environment (Water Framework Directive) (England and Wales) Regulations.*

<sup>158</sup> National Planning Policy Framework, paragraph 20 (2021) MHCLG

<sup>159</sup> National Planning Policy Framework, paragraph 153 (2021) MHCLG

<sup>160</sup> [Thames River Basin District Management Plan 2022](#)

[Thames river basin district river basin management plan: updated 2022 - GOV.UK \(www.gov.uk\)](#)

15.38~~9~~ *The Environment Agency defines a water stressed area as a location where ‘the current household demand for water is a high proportion of the current effective rainfall which is available to meet that demand or where the future household demand for water is likely to be a high proportion of the effective rainfall available to meet that demand’.* Crawley Borough Council is one of many local authorities to have declared a climate emergency. Climate change is predicted to increase pressure on water resources, increasing the potential for a supply-demand deficit in the future, and making environmental damage from over abstraction of water resources more likely. The delivery of water and wastewater services and the heating of water in the home require high energy inputs, and water efficiency can reduce energy use and carbon emissions. It is equally important that development does not cause an unsustainable increase in water abstraction.

15.39~~40~~ *Crawley’s water is supplied by three different water companies; Southern Water, South East Water, and Sutton & East Surrey Water. The Environment Agency has classified the whole borough as being Seriously Water Stressed, so it is appropriate that development outside the area supplied by Southern Water in its Sussex North WRZ, meets the Part G Building Regulations technical standard of 110l/p/d for residential or BREEAM ‘Excellent’ for non-domestic uses. This approach also reflects that set out by DEFRA in its September 2021 letter to Local Planning Authorities<sup>161</sup> supporting application of the tighter 110l/p/d standard in water stressed areas. Development in the Sussex North WRZ is subject to the water neutrality requirements set out in Policy SDC4.*

15.40~~1~~ *Therefore, Local Plan requires that, outside of the Sussex North WRZ, all residential development, including the subdivision of existing buildings into multiple dwellings, achieves the optional requirement set out in Building Regulations<sup>162</sup> of 110 l/p/d (105 l/p/d with an additional 5 l/p/d for external use). For non-domestic development there is currently no nationally applied standard for water efficiency of buildings (only minimum performance requirements for individual water using fixtures). However, BREEAM sets out standards for minimum water performance of such buildings. This is done using the BREEAM water calculation method to assess the percentage reduction in internal potable water usage of the proposed building performance as compared to that of a notional building, using standardised assumptions for occupant behaviour. Given the findings of the council’s Water Cycle Studies and the work undertaken in partnership with the Environment Agency as an area of serious water stress, non-domestic developments are required to install water meters and to meet the highest water efficiency requirements. The Policy requires that, where located outside of Sussex North WRZ, non-residential development must equal or exceed BREEAM Excellent requirements, which require that there is a 25% reduction in potable water use. Further information on water efficiency is provided in the Planning and Climate Change SPD:*

15.42 *Measures that maximise the water efficiency of development are encouraged, and should development be designed to a more ambitious water efficiency standard than outlined in Policy SDC3, this will be supported. Further guidance is provided in the Waterwise UK Water Efficiency Strategy to 2030<sup>163</sup> and the Planning and Climate Change SPD.*

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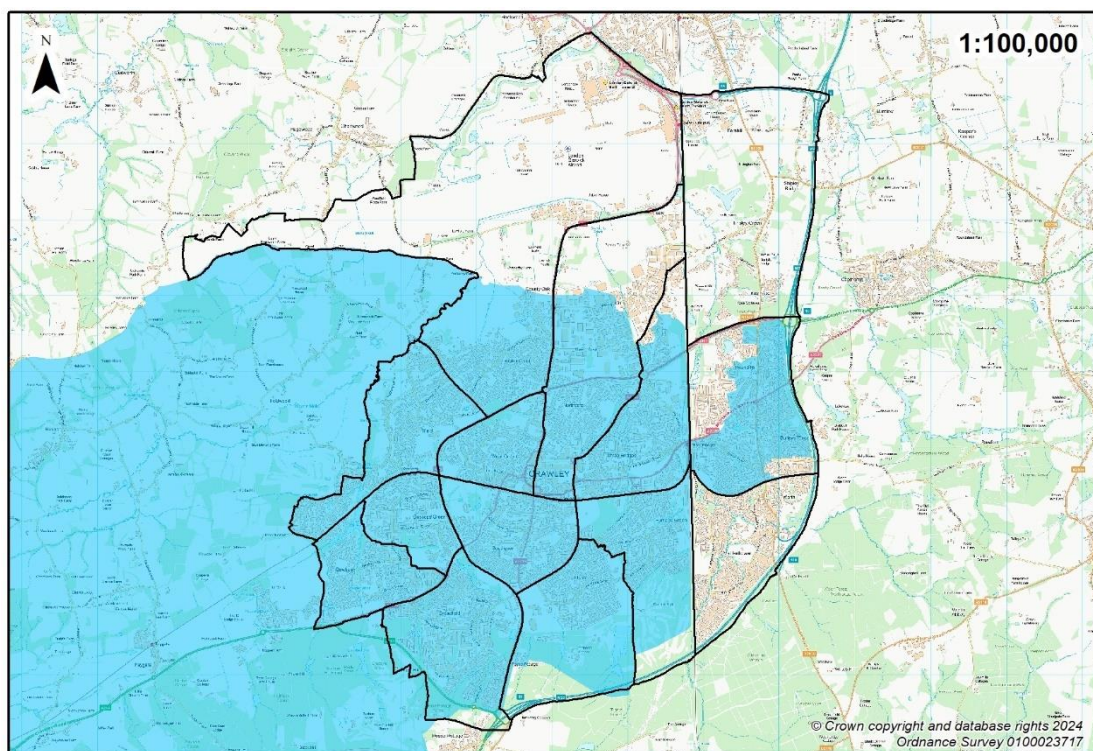
<sup>161</sup> Letter to Local Planning Authorities, *Water Efficiency in New Homes*, 1 September ~~2022~~ 2024, DEFRA

<sup>162</sup> Building Regulations Approved Document G (Sanitation, Hot Water Safety and Water Efficient)

<sup>163</sup> [Waterwise UK Water Efficiency Strategy to 2030](#)  
[J37880-Waterwise Water Efficiency Strategy Inners Landscape WEB.pdf](#)

## Water Neutrality

- 15.4~~3~~<sup>3</sup> Crawley borough lies within Southern Water’s Sussex North Water Resource Zone (WRZ), within which water is mains-distributed by Southern Water. As well as covering Crawley, the WRZ covers Horsham district, parts of Arun district, Chichester district, and areas located in the South Downs National Park.
- 15.4~~2~~<sup>4</sup> Sussex North WRZ is supplied from groundwater abstraction, from the Folkestone beds of the Lower Greensand/Wealden Greens and semi-confined aquifer, on the River Arun, close to Pulborough in Horsham district. The abstraction site is located close to a group of nature conservation sites, known as the Arun Valley Sites, that are nationally or internationally designated as Special Areas of Conservation, Special Protection Area, and a Ramsar Site for their rare and protected habitats. On 14 September 2021, local planning authorities covered by the Sussex North WRZ received a Position Statement from Natural England. This set out that it could not be concluded with certainty that water abstraction at Pulborough was not impacting negatively on the Arun Valley Sites, and outlined that development must not add to this impact. Given the high level of regulatory protection afforded to the Arun Valley Sites, certainty is needed that development will not have an adverse effect on the sites.
- 15.4~~3~~<sup>5</sup> To provide the necessary certainty, the most feasible approach is for development ~~must~~ to demonstrate that it is water neutral. This means that 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. Water neutrality should be achieved by first ensuring that development is highly water efficient, and secondly by ensuring that the additional demand arising from development is offset within the Sussex North WRZ.



■ Sussex North Water Resource Zone: Water Neutrality (Policy SDC4)

**Figure 27: Sussex North Water Resource Zone - Crawley borough**

- 15.4~~6~~<sup>6</sup> This means that all development will need to be designed to achieve water efficiency standards above the requirements set out by the optional requirements in Building

Regulations. New residential development will be required to use no more than 85 litres per person per day (l/p/d) and non-residential buildings 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).

15.457 Water efficient design will not be sufficient alone to achieve water neutrality, as new development, regardless of how efficient it is, would still increase the demand for water above existing levels. Therefore, the 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 and South Downs National Park Authority**-led Offsetting Implementation Scheme (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 to achieve water neutrality through other means, but the key principles of water efficient design and offsetting the additional demand created, remain. Offsetting is expected to be provided prior to occupation of new developments and this shall be secured through the Development Management process.

#### **Strategic Policy SDC4: Water Neutrality**

1. All development within the Sussex North Water Resource Zone (WRZ) will need to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development. This is to be achieved by ensuring that:

##### **Water Efficient Design**

- a) New residential development is designed to utilise no more than 85 litres of mains supplied water per person per day;
- b) New non-domestic buildings achieve a score of 3 credits within the water (WAT01 Water Consumption) issue category for the BREEAM Standard or an equivalent standard set out in any future update;

AND

##### **Offsetting Water Use**

- c) Development proposals demonstrate that having achieved water efficient design, any remaining mains-supplied water use from the development is offset such that there is no net increase in mains-supplied water use within the WRZ compared with pre-development levels.

##### **Water Neutrality Statement**

2. ~~5.~~ **A water neutrality statement will be required to demonstrate how policy requirements have been met in relation to water supply, water efficient design and offsetting. The statement shall provide, as a minimum, the following:**
  - a. **baseline information relating to existing water use within a development site;**
  - b. **full calculations relating to expected water use within a proposed development;**
  - and**
  - c. **full details of how any remaining water use will be offset.**

### Offsetting Schemes

3. ~~2.~~ A local ~~planning~~ authority and South Downs National Park Authority (SDNPA)-led water offsetting scheme will be introduced to bring forward development and infrastructure supported by Local and Neighbourhood Plans. The authorities will manage access to the offsetting scheme to ensure that sufficient water capacity exists to accommodate planned growth within the Plan period.
4. ~~3.~~ Development proposals are not required to utilise the local ~~planning~~ authority and SDNPA-led offsetting scheme and may bring forward their own offsetting schemes. Any such development proposals will need to have regard to the local authority and SDNPA-led offsetting scheme and associated documents.
5. Offsetting schemes can be located within any part of the WRZ, with the exception that offsetting will not be accepted within the Bramber/Upper Beeding area in Horsham district.

### Alternative Water Supply

6. ~~4.~~ Where an alternative water supply is to be provided, the Water Neutrality s 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.

### Water Neutrality Statement

- ~~5. A water neutrality statement will be required to demonstrate how policy requirements have been met in relation to water supply, water efficient design and offsetting. The statement shall provide, as a minimum, the following:~~
- ~~d. baseline information relating to existing water use within a development site;~~
  - ~~e. full calculations relating to expected water use within a proposed development; and~~
  - ~~f. full details of how any remaining water use will be offset.~~

### Area of Serious Water Stress

7. Should the need to demonstrate water neutrality no longer be required, new residential development must be designed to utilise no more than 110 litres of mains supplied water per person per day, as per the Building Regulations optional requirement for tighter water efficiency. For non-domestic buildings, the minimum standards for BREEAM 'Excellent' within the Water category will apply. Should tighter national standards be introduced during the Local Plan period applicable for areas of serious water stress, they will be applied.

### Reasoned Justification

- 15.468 *The impact of groundwater abstraction within the Sussex North Water Resource Zone was identified by Natural England as a concern in 2019. At this time, Natural England advised Southern Water that it could not conclude, with certainty, that existing abstraction within the Sussex North Water Resource Zone was not having an adverse impact on the integrity of the designated sites through reduced water levels and potential water quality impacts. The affected sites include Amberley Wild Brooks SSSI and Pulborough Brooks SSSI, which form part of Arun Valley SPA, Arun Valley SAC and Arun Valley Ramsar site.*
- 15.479 *In addition to existing pressures, Natural England is also concerned that the Sussex North WRZ will be subject to significant future development pressures that would necessitate increased abstraction within the region that would likely further exacerbate any existing impacts on the Habitats Sites. Pursuant to these concerns, on 14*

September 2021 Natural England advised the relevant Local Authorities that existing abstraction within the Sussex North WRZ could not be ruled out as causing an adverse effect on the Habitats Sites. Furthermore, if further development were to be consented in this region (with the requirement for additional abstraction) such development was likely to have an adverse effect on the designated sites. To avoid an adverse effect on integrity, the conservation status of a habitat must, if favourable, be preserved. If unfavourable, it must not be further harmed or rendered more difficult to restore to a favourable status. It is this which Water Neutrality is seeking to achieve.

15.48<sup>50</sup> To ensure that development identified in the Local Plan comes forward in a manner that enables water supplies to be maintained and the environment protected, the affected local authorities have worked with consultants, Natural England, Southern Water, the Environment Agency and others to produce a Water Neutrality Strategy. The Water Neutrality Strategy evidences that the amount of development proposed in this Local Plan and in Local Plans of the other affected authorities, provided it is delivered to the water efficiency standards set out in the policy and achieves sufficient offsetting within the Sussex North WRZ, would not increase abstraction at Pulborough and thus, would not negatively impact on the Arun Valley Sites. It should be noted that the precise boundary of the Sussex North WRZ may be amended by Southern Water over the Plan period, and applicants should clarify with Development Management prior to submitting a planning application.

15.49<sup>51</sup> Applicants using the **Local Authority and SDNPA-led** Offsetting Implementation Scheme (OIS) to offset water, will 'buy in' to the scheme at a level to ensure that their development achieves water neutrality. Where development achieves its offsetting through accessing the Local Authority OIS, a proportionate developer contribution will be secured. Further detail on this contribution is set out in the Planning Obligations Annex. Recognising that the capacity of water offsetting that the OIS can provide may be limited at particular points in time during the plan period, the authorities will monitor use across the WRZ and manage access to the OIS to ensure that, prior to permissions being granted, sufficient water capacity exists to ensure that water neutrality will be achieved when occupation takes place.

**15.52 Offsetting capacity in the OIS is not limitless and access will be managed by the local authorities and SDNPA to ensure there is sufficient capacity in the OIS to demonstrate water neutrality in schemes that are approved. The authorities will publish, and keep regularly updated, a Scheme Access Prioritisation Protocol (SAPP) to show how access to the offsetting in the OIS will be managed. Infrastructure necessary to support planned growth, such as schools, will be prioritised in the SAPP.**

15.50<sup>3</sup> Development is not required to utilise the Local Authority **and SDNPA-led** OIS, and may choose to undertake its required water offsetting through other offsetting schemes. Where this is the case, offsetting must take place within the Sussex North WRZ. The exception to this is the Bramber/Upper Beeding area (Horsham district), as water in this part of the Sussex North WRZ is usually provided by a water source other than the Pulborough abstraction site, meaning that offsetting cannot take place within this area. The Bramber/Upper Beeding area is shown on the interactive Water Neutrality Map: <https://www.westsussex.gov.uk/planning/water-neutrality/>.

15.51<sup>4</sup> For all development, it will be necessary to demonstrate how water neutrality will be achieved through a Water Neutrality Statement to be submitted as part of any planning application within the Sussex North WRZ. This will be required to set out baseline information relating to existing water use within a development site, full calculations

relating to expected water use within a proposed development, and full details of how any remaining water use will be offset. Detail should also be provided as to how delivery of water efficiency measures, alternative water supplies and offsetting prior to occupation of the development will be verified and monitored.

15.55 Should applicants not utilise the Local Authority *and SDNPA-led* OIS, **certainty of delivery of alternative offsetting will need to be demonstrated.** The Water Neutrality Statement should supply full details of the offsetting scheme that their development would rely upon. **Similarly, certainty of alternative supply will need to be demonstrated in the Water Neutrality Statement. For connection to an alternative water company, this could be achieved by confirming that the alternative water company has sufficient capacity and will take on supply to the development. For a private supply borehole or other source of supply, this will require evidence that sufficient water supply is available to meet demand arising from the proposed development, and demonstrating with certainty that the alternative supply source does not impact upon the Arun Valley sites.**

15.56 **To provide the necessary certainty, measures to deliver water neutrality will need to be secured through the Development Management process.** The council will seek to provide additional guidance to further assist applicants with water neutrality statements.

## Environmental Protection

- 16.1 Crawley is distinct in comparison to other districts and boroughs in the sub-region. Whilst located in a countryside setting, it is significantly urban in character, well linked to the motorway network, and contains a major international airport at Gatwick. The borough is also home to one of the largest employment areas in the south east at Manor Royal and County Oak. These attributes have contributed to Crawley becoming a leading economic driver in the sub-region, and a focus for growth, but can also result in pollution impacts which need to be mitigated and managed. With further economic and residential growth required to meet identified needs over the Plan period to 2040, it is vital that development is carefully and sustainably planned with the environment in mind.

### Chapter Content

- 16.2 The NPPF is clear that planning policies and decisions should contribute to and enhance the natural and local environment, including by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by soil, air, water or noise pollution. Policies should also support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, including through taking account of long-term implications for flood risk. This chapter sets out policies to guide the relationship between development and the environment, ensuring that sustainable development is achieved.

### The Key Issues

- 16.3 Crawley is home to major transport hubs and networks, industrial and commercial uses, as well as more sensitive uses including residential areas, green infrastructure, and also countryside outside the built-up area boundary. It is important that the relationship between different land uses is appropriately managed, and development carefully planned, to ensure that it does not result in, nor expose its users to, unacceptable environmental impacts. Crawley is fortunate in having few areas that are subject to serious environmental or pollution issues, though the urban nature of much of the borough, and the variety of different land uses within it, means that the relationship between development and the environment is an important consideration in planning decisions.
- 16.4 Flood risk is a key issue for Crawley. Falling entirely within the River Mole catchment, parts of the borough are significantly affected by river (fluvial) flood risk, and other flood sources including surface water (pluvial), sewer and ground water. High profile flood events serve as a reminder of the need to appropriately manage the relationship between development and areas at risk of flooding, and it is vital that the planning process considers the flood risk implications of development, both for the users of that development and through ensuring that new development does not unacceptably increase flood risk elsewhere.
- 16.5 The presence within the borough of both noise generating and noise-sensitive uses; means that the relationship between development and noise must be carefully managed. Aviation noise is a significant consideration, with a large extent of the borough falling within the noise contours of Gatwick Airport, including the future noise contours of a possible southern wide-spaced runway. Noise from surface transport can be significant, with the M23 motorway located to the east of Crawley and a number of busy roads running through the borough. Given the borough's significant economic



function, noise from commercial and other sources must also be taken into account, having regard to the ‘Agent of Change’ principle.

- 16.6 Air Quality is a significant issue in places, particularly in areas where surface transport is concentrated. This is recognised through the designation of Hazelwick Air Quality Management Area (AQMA) in 2015, and its extension in 2021, following exceedances of the average annual objective for nitrogen dioxide outside the existing boundary. Pollution can take other forms, including land-based contamination which can be harmful to the environment and sensitive land uses, and the effect of light pollution which can be harmful to the night-time environment and potentially have an urbanising effect that undermines amenity and setting.
- 16.7 It is important that development contributes to and enhances the natural and local environment. Through the policies set out in this Chapter, the relationship between development and environmental factors will be appropriately managed to ensure that sustainable development is achieved.

## Local Plan Policies

### Development and Flooding

- 16.8 Crawley borough falls entirely within the upper reaches of the River Mole catchment, with a number of areas at risk of flooding from fluvial sources, and the northward flow of the Upper Mole towards the Thames also having flood implications for Gatwick Airport and neighbouring authorities. River flooding is not the only source of flood risk; Crawley is at the highest risk of surface water flooding in West Sussex, whilst flood risk from groundwater and sewer sources must also be considered.
- 16.9 Development must be planned sustainably with flood risk from all sources in mind to ensure the well-being of its future users over the lifetime of development, whilst ensuring that it does not increase flood risk elsewhere. The NPPF and PPG: *Flood Risk and Coastal Change* categorise different development types according to their vulnerability to flood risk, and considers the extent to which these uses are compatible or otherwise with the level of flood risk at a given site. Through applying the sequential test, development should be directed to the areas of lowest flood risk.

#### Policy EP1: Development and Flood Risk

Development must avoid areas which are exposed to an unacceptable risk from flooding, and must not increase the risk of flooding elsewhere. To achieve this, development will:

- be directed to areas of lowest flood risk having regard to its compatibility with the proposed location in flood risk terms, and, where required, demonstrating that first the sequential test and, if needed, the exception test are satisfied;
- where located in Flood Zones 2 or 3, and for all major development in Flood Zone 1 or where otherwise required by the NPPF, demonstrate through a Flood Risk Assessment how appropriate mitigation measures will be implemented to ensure that over the lifetime of the development and taking climate change into account, that flood risk is acceptable on site, and is not increased elsewhere as a result of the development;
- 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;
- make appropriate provision for surface water drainage to [the](#) ground, water courses or surface water sewers, [having regard to surface water flow paths](#). Surface water will

not be allowed to drain to the foul sewer. **Opportunities to maximise water re-use within a development should also be considered where feasible. For major development, planning applications should be accompanied by a site-specific drainage strategy;**

- v. not be permitted to take place within 8 metres from the **edge of bank of top of** any Main River or ~~12 metres from any~~ Ordinary Watercourse, nor within 3 metres of any sewer system without prior consent from the appropriate authority;
- vi. post construction, provide to the council certification of the drainage works from a third party professional. This should not be the consultant who designed the drainage features. This will be to ensure that the drainage details and design submitted for planning application has been constructed in line with the submitted documents.

### **Reasoned Justification**

- 16.10 *Flooding is a natural process that can happen at any time in a wide variety of locations, potentially posing a risk to life, property and livelihoods. The risk of flooding posed to properties within Crawley arises from a number of sources including river flooding, localised runoff and sewer flooding.*
- 16.11 *Development has the potential to increase the likelihood of flood risk if it is not carefully planned and managed. There are areas which are particularly at risk from fluvial flooding as Crawley is crossed by a number of designated main river watercourses that form part of the River Mole catchment. Climate change, and the predicted alterations to weather patterns this will bring, place additional need to ensure development can be considered as safe for its lifetime. Therefore, to ensure that people and places are not exposed to unacceptable flood risk, it is essential that planning decisions are informed by, and take due consideration of, the flood risk posed to (and by) development.*
- 16.12 *Flash flooding from surface water run-off is frequently an issue across the borough following heavy localised rainfall events. It is a specific issue in Crawley as the underlying clay soil and density of urban development reduces permeability and increases the levels and speed of surface water run-off. This can result in localised surface flooding, and can lead to rivers exceeding their storage capacity more quickly, often resulting in 'flash flooding'. It is the responsibility of the developer to make proper provision for surface water drainage to ground, water courses or surface water sewers. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.*
- 16.13 *The NPPF requires local planning authorities to take a pro-active approach to managing impacts associated with climate change, including flood risk. The risk of a flood event is a function of both the probability that the flood will occur and the consequence to the community as a direct result of the flood. To minimise risks to property, development should be avoided in areas which are at greatest risk of flooding, and directed to sequentially preferable areas of lowest risk. Where, having applied the sequential test, it is not possible for development to be located in areas of lower flood risk, then the NPPF exceptions test should be applied and satisfied. The Exception Test is not a tool to justify development in flood risk areas when the Sequential Test has already shown that there are reasonably available, lower risk sites, appropriate for the proposed development.*
- 16.14 *To guide the location of development, Planning Practice Guidance: Flood Risk and Coastal Change (DLUHC, 2022) identifies the different levels of flood risk, ranging from land at the greatest probability of flooding (Flood Zone 3b functional floodplain)-to Flood Zone 1, the low probability.*

- 16.15 To identify the extent to which land is at risk of flooding, applicants should refer to the Crawley Strategic Flood Risk Assessment. Based on the SFRA mapping, Crawley is delineated into the following fluvial Flood Zones:
- **Flood Zone 1:** Low probability: less than a 0.1% chance of river and sea flooding in any given year.
  - **Flood Zone 2:** Medium probability: between a 1% and 0.1% chance of river flooding in any given year or 0.5% and 0.1% chance of sea flooding in any given year.
  - **Flood Zone 3a:** High probability: greater or equal to a 1% chance of river flooding in any given year or greater than a 0.5% chance of sea flooding in any given year. Excludes Flood Zone 3b.
  - **Flood Zone 3b:** Functional Floodplain: land where water has to flow or be stored in times of flood. The identification of functional floodplain set out in the SFRA takes account of local circumstances and has been agreed with the Environment Agency. Only water compatible and essential infrastructure are permitted in this zone and should be designed to remain operational in times of flood, resulting in no loss of floodplain or blocking of water flow routes. Flood Zone 3b is defined as land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively, or land that is designed to flood (such as a flood attenuation scheme). [The 2023 SFRA applies a precautionary approach, as agreed with the Environment Agency, using the 2% AEP output to derive Flood Zone 3b.](#)
- 16.16 The SFRA mapping is based on the 2020 update of the Environment Agency River Mole modelling, though does inevitably represent a point in time. To ensure that the most up-to-date information is considered, applicants should refer, in addition to the SFRA, to the most recent Environment Agency Flood Map for Planning, and should consult with Environment Agency and Lead Local Flood Authority to understand if more recent data is available.
- 16.17 The NPPF seeks to avoid, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding. Where it is not possible to locate development in low risk areas, the sequential test should compare reasonably available sites with medium risk areas. Only where there are no reasonably available sites in low or medium risk areas should high-risk areas be considered. As a 'more vulnerable' use, residential development should be steered to areas of low risk in the first instance, before areas of medium flood risk are considered, subject to demonstrating compliance with the sequential test and the acceptability of development through a site-specific Flood Risk Assessment. The Flood Risk Assessment will need to demonstrate how flood risk will be managed now and over the development's lifetime, taking climate change into account and with regard to the vulnerability of its users. Residential development on land falling within Flood Zone 3a will only be acceptable where it can be demonstrated through a site-specific Flood Risk Assessment, that firstly the requirements of the sequential test are met, and secondly that the exception test is satisfied.
- 16.18 All housing sites identified in Local Plan Policy H2 are considered to be appropriate locations in terms of flood risk. This assessment follows early engagement on the Local Plan with the Environment Agency and West Sussex County Council (WSCC). Of the sites allocated by the Local Plan for residential development, Land adjacent Desmond Anderson, Tilgate is partly affected by Flood Zones 3b/a and Flood Zone 2. Land West of Balcombe Road/Street Hill, Pound Hill South and Worth, identified as a housing, biodiversity and heritage site, is subject to a small area of Flood Zones 2 and 3. The principle of residential development at each of these sites is accepted, subject to

*applicants demonstrating, through a Flood Risk Assessment, that the proposed development has been carefully planned and is acceptable in terms of flood risk.*

- 16.19 *West Sussex County Council (WSCC) is the Lead Local Flood Authority (LLFA), meaning it is a statutory consultee on planning applications where flood risk is a consideration. In its capacity as LLFA, WSCC published West Sussex Lead Local Flood Authority Policy for the Management of Surface Water (November 2018), which sets out the requirements for drainage strategies and surface water management provisions associated with applications for development. In responding to flood risk as part of the planning application process, applicants should meet the requirements set out by WSCC, demonstrating the extent, position, function and future management arrangements for the sustainable drainage system for a proposed site. This information will be required for all development, except for those development types identified within Local Plan Policy EP2 and at Paragraph 16.17, and should be submitted to the Local Planning Authority at the time that an application is made. Further guidance is provided in the SFRA (2020) and the Climate Change Supplementary Planning Document.*
- 16.20 *The provision of buffer strips is important in preserving watercourse corridors, flood flow conveyance and for future watercourse maintenance and improvement. It also enables the avoidance of disturbing ecology and the structural integrity of riverbanks. The buffer distances set out in the Policy are to ensure the preservation of the watercourse corridor, wildlife habitat, flood flow conveyance and future watercourse maintenance or improvement. Where development is proposed within the buffers referred to at EP1 v.), for Main Rivers, prior consent should be obtained from the Environment Agency. For Ordinary Watercourses, prior consent should be obtained from Crawley Borough Council, and in relation to a sewer system, prior consent should be obtained from Thames Water as the sewerage undertaker.*
- 16.21 *Whilst individual development with appropriate site mitigation measures should not result in measurable local effects with respect to hydrology and flood risk, the cumulative effect of multiple development may be more severe at downstream locations in the catchment. Development should therefore incorporate Sustainable Drainage Systems (SuDS) to manage surface water, with the primary aim of reducing flood risk. SuDS represent the most effective approach to reducing flood risk for relatively high intensity, short and medium duration events, and are particularly important in mitigating potential increases in surface water flooding, sewer flooding and flooding from small and medium sized watercourses resulting from development. SuDS can deliver wider sustainability benefits, enabling surface water to be collected for use in homes and gardens, adaptation to climate change through recharge of the watercourse and underlying aquifers, and biodiversity and habitat enhancements. Use of SuDS can also support the management of diffuse pollution generated by urban areas through the sequential treatment of surface water, reducing the pollutants entering lakes and rivers, resulting in lower levels of water supply and wastewater treatment being required. This treatment of diffuse pollution at source can contribute to meeting Water Framework Directive water quality targets, as well as national objectives for sustainable development.*
- 16.22 *Scope may exist to incorporate natural flood management approaches to protect, restore and re-naturalise the function of catchments and rivers to reduce flood risk by emulating the natural regulating functions of catchments, rivers, and floodplains. A wide range of techniques can be used that aim to reduce flooding by working with natural features and processes in order to store or slow down flood waters, including offline storage areas, restoration of rivers or removal of redundant structures, re-meandering*

*streams, targeted woodland planting, and reconnection and restoration of functional floodplains.*

### **Flood Risk Guidance for Householder Development and Small Non-Residential Extensions**

- 16.23 Some existing residential dwellings and non-residential buildings in Crawley are situated in areas of flood risk, falling within Flood Zone 2 (medium probability), Flood Zone 3a (high probability) or Flood Zone 3b (functional floodplain). It is recognised that the occupiers of these properties may seek to apply for planning permission to undertake small-scale development that is associated with the use of the existing building, such as householder applications, or small ground floor extensions. This type of development, though of a relatively small-scale, still has potential to take up flood storage, and will itself be vulnerable to flooding.
- 16.24 In these situations, a detailed Flood Risk Assessment would not be proportionate to the nature and scale of development being proposed. Therefore, for the development typologies identified in Policy EP2, and defined at paragraph 16.26, a proportionate Flood Risk and Resilience Statement will be required to support planning applications. This will demonstrate how any lost flood storage will be mitigated, and how the proposed development will be made resilient in flood risk terms.

#### **Policy EP2: Flood Risk Guidance for Householder Development, Small Non-Residential Extensions**

Within areas of medium or high flood risk, including Flood Zone 2 (medium probability), Flood Zone 3a (high probability) and Flood Zone 3b (functional floodplain) a detailed Flood Risk Assessment will not be required for:

- i. Householder development
- ii. Minor non-residential extensions with a footprint of less than 250m<sup>2</sup>
- iii. Minor alterations to property.

Instead, a Flood Risk and Resilience Statement must be provided. This will be required to, on a proportionate basis, demonstrate how:

- i) any loss of flood storage resulting from the development will be appropriately mitigated; and
- ii) the development has been designed to ensure that, over its lifetime and taking climate change into account, it is resilient to the level of flood risk posed.

#### **Reasoned Justification**

- 16.25 *Some existing buildings within Crawley borough are situated within areas of medium or high flood risk probability, including in fluvial Flood Zones 2 and 3a/b, and are, therefore, subject to an existing level of flood risk. In individual cases where small-scale development is proposed to existing buildings that are already affected by flood risk, this is unlikely to result in a significant increase in flood risk. However, cumulatively, such developments will have an overall impact of reducing flood storage capacity in the borough, unless carefully planned to ensure that any loss of flood storage is appropriately mitigated. Equally, it is recognised that the development proposed will, as is the case for the existing building, be at a risk of flooding. Therefore, it is important that development is designed to ensure that any loss of flood storage is appropriately mitigated, and that development is resilient to the level of flood risk posed.*

- 16.26 *Local Plan Policy EP2 applies to the following development typologies:*

- i. *Householder Development: for example, sheds, garages, games rooms etc. within the curtilage of the existing dwelling, in addition to physical extensions to the existing dwelling itself. This definition excludes any proposed development that would create a separate dwelling within the curtilage of the existing dwelling, e.g. subdivision of houses into flats.*
- ii. *Minor Non-Residential Extensions: for example, industrial, commercial, leisure extensions with a footprint less than 250 square metres.*
- iii. *Minor Alterations to Property: minor development that does not increase the size of buildings, such as alterations to external appearance. This definition excludes changes of use that would increase flood risk as a result of a changed flood risk vulnerability classification.*

16.27 *The nature and scale of these development types can be problematic to consider as part of a detailed Flood Risk Assessment, sometimes resulting in delay to the decision-making process. To simplify the planning process for small-scale development, whilst still ensuring that matters of flood storage and resilience are adequately addressed, a proportionate Flood Risk and Resilience Statement will be required. This will need to demonstrate how any loss of flood storage resulting from the development will be appropriately mitigated, and how the development has been designed to ensure that it is resilient, now and over its lifetime, to the level of flood risk posed. In doing so, the statement will be expected to show how appropriate flood storage mitigation such as green infrastructure or SuDS has been incorporated into the development, and will need to explain how the development will be designed and constructed to reduce impacts in the event of flood water entering the building.*

### **Land and Water Quality**

16.28 Generally land and water quality in Crawley is good. Most land contamination is derived from existing or historic activities, and the potential for contamination is largely, but not exclusively, confined to the existing Main Employment Areas. Historic rural activities which are likely to have been present in the area also have the potential to give rise to land contamination. As a result, it is possible that development may be proposed on land that is already subject to existing land contamination, or which may propose a use that could, if not carefully planned, impact negatively on land or water bodies. In these cases, it will be necessary to ensure that land quality is investigated and remediated.

#### **Policy EP3: Land and Water Quality**

People’s health and quality of life, property and the wider environment will be protected from unacceptable risks of, and adverse effects associated with, radioactivity, chemical substances and biological agents in land.

Development will adhere to the appropriate local and national standards, procedures and principles to ensure that, having undertaken appropriate land quality assessment, remediation, and protection, the land is suitable for the proposed use.

##### **A. Sensitive Development**

Development on land that is affected by the above pollutants will be permitted where it can be clearly demonstrated that the development, its future occupiers and the wider environment will not be exposed to unacceptable risk from, or be adversely affected by, land contamination.

### **B. Development With Potential For Causing Land Contamination**

Development that has the potential to cause land contamination will only be permitted where the applicant demonstrates that:

- i. adequate measures will be put in place to protect land quality and any receiving waters;
- ii. there will be no adverse impacts to occupiers of neighbouring land or the wider environment as a result of the development.

There are complementary pollution control regimes that also have this effect, and therefore the planning regime is only relevant where these pollution control regimes do not exist.

### **Reasoned Justification**

16.29 *The NPPF recognises that development may be proposed on land that is subject to existing land contamination, or may take the form of a use that could impact negatively on land or water bodies. The NPPF also requires that Local Plans aim to minimise pollution and other adverse effects on the natural environment and encourage re-use of despoiled, degraded, or contaminated brownfield land, where appropriate, through remediation and mitigation.*

16.30 *The re-use of brownfield sites is encouraged in order to reduce the need to develop greenfield sites, and remove or reduce the risks posed by contamination to health, safety and the environment. In doing so, it offers a sustainable approach to redevelopment by allowing regeneration of specific areas as well as potentially delivering environmental benefits. After remediation land should be appropriate for the proposed use and as a minimum should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 (or as revised).*

### **Development and Noise**

16.31 Due to the urban nature of Crawley noise sources and exposure vary. There are relatively tranquil areas, such as within Crawley's large parks, ranging to much noisier areas close to the M23, Main Employment Areas, and land close to Gatwick Airport. Where exposure to noise becomes noticeable or significant, this can result in changes to people's behaviour. Should the level of noise exposure become unacceptable the impacts can become far-reaching, fundamentally affecting quality of life, and potentially resulting in serious health and stress related problems, amenity issues, and negative impacts on productivity and learning. For these reasons, it is fundamental that the relationship between noise sources and noise sensitive development is effectively and appropriately managed through the Local Plan.

### **Policy EP4: Development and Noise**

People's health, quality of life and cognitive ability and development will be protected from unacceptable noise impacts by managing the relationship between noise sensitive development and noise sources. To achieve this, Policy EP4 should be read in conjunction with the Local Plan Noise Annex, and development is required to adhere to the provisions and standards contained within it.

#### **A. Noise Sensitive Development**

Residential and other noise sensitive development will **only** be permitted where it can be demonstrated that users of the development will not be exposed to unacceptable noise impact from existing, temporary or future uses. **In the case of development likely to experience noise or effects within the Significant Observed Adverse Effects Level, only**

**when it is first proven that it is necessary to develop in that location having taken all circumstances into account will permission be considered.**

Noise sensitive uses proposed in areas that are exposed to noise above the Lowest Observed Adverse Effect Level (LOAEL) or **at within** the Significant Observed Adverse Effect Level (SOAEL) from existing or future industrial, commercial or transport (air, road, rail and mixed) sources will **only** be permitted where: **in the case of effects within SOAEL there is no alternative; and in all cases** it can be demonstrated good acoustic design has been considered early in the planning process, and that all appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be made acceptable. Noise sensitive uses proposed in areas that are exposed to noise at the Unacceptable Adverse Effect level will not be permitted.

For surface transport noise sources, the Unacceptable Adverse Effect Level is considered to occur where noise exposure is above 66dB  $L_{Aeq,16hr}$  (57dB  $L_{Aeq,8hr}$  at night).

For aviation transport sources the Unacceptable Adverse Effect is considered to occur where noise exposure is above 60dB  $L_{Aeq,16hr}$  (57dB  $L_{Aeq,8hr}$  at night).

#### **B. Noise Generating Development**

Noise generating development will be permitted where it can be demonstrated that nearby noise sensitive uses (as existing or planned) will not be exposed to noise impact that will adversely affect the amenity of existing and future users. Proposals will adhere to standards identified in the Local Plan Noise Annex to establish if the proposal is acceptable in noise impact terms, and where required will, through good acoustic design, appropriately mitigate noise impacts through careful planning, layout and design. Noise Generating Development that would expose users of noise sensitive uses to Unacceptable Adverse Effect noise will not be permitted.

#### **C. Noise Impact Assessment**

A Noise Impact Assessment will be required to support applications where noise sensitive uses are likely to be exposed to significant or unacceptable noise exposure. The Noise Impact Assessment will:

- i. assess the impact of the proposal as a noise receptor or generator as appropriate; and
- ii. demonstrate in full how the development will be designed, located, and controlled to mitigate the impact of noise on health and quality of life, neighbouring properties, and the surrounding area.

In preparing a Noise Impact Assessment, applicants will adhere to Planning Noise Advice Document: Sussex (~~2021~~ 2023 or latest revision) and ProPG (Professional Practice Guidance on Planning & Noise for New Residential Developments) for further guidance. Where there is conflict between these documents and the Local Plan, the Local Plan documents take precedent.

#### **D. Mitigating Noise Impact**

Where proposals are identified as being in the Lowest Observed Adverse Effect Level (LOAEL) or the Significant Observed Adverse Effect Level (SOAEL) categories, either through noise exposure or generation, all reasonable mitigation measures must be employed to mitigate noise impacts to an acceptable level that is as low as is reasonably achievable. Appropriate mitigation must be delivered as part of the development to ensure that the impacts of existing or known potential future noise sources are acceptable on the use being applied for by the applicant.



### **Reasoned Justification**

- 16.32 *Key to the Local Plan approach is a methodology of separating noise sensitive developments and noise generating sources, whilst ensuring that the PPG ‘agent of change’ principle is adhered to. For the purpose of interpreting and applying Local Plan Policy EP4, reference should be made to the Local Plan Noise Annex. The Local Plan Noise Annex outlines specific noise metrics that define when noise impact becomes observed (Lowest Observed Adverse Effect Level – LOAEL), significant (Significant Observed Adverse Effect Level – SOAEL), and unacceptable (Unacceptable Adverse Effect). It also details the appropriate noise contours that need to be taken into account in the preparation and determination of planning applications, and provides wider guidance and evidence relating to noise in Crawley. Development is therefore expected to adhere to the provisions and standards set out in the Local Plan Noise Annex.*
- 16.33 *Crawley is one of 65 large urban areas in England to which the Environmental Noise Directive applies, and the Local Plan approach to managing noise has regard to Noise Action Plans produced by DEFRA to promote good health and good quality of life. Given Crawley’s unique noise environment, it is considered that locally-specific guidance is needed to ensure that national objectives are met, whilst ensuring that an approach that is consistent with adjoining local planning authorities is progressed.*
- 16.34 *The NPPF requires that planning policies and decisions avoid noise giving rise to significant adverse impacts on health and quality of life. New development must be appropriate to its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment. Potential adverse impacts should be mitigated and reduced to a minimum. To ensure that the Local Plan appropriately manages and mitigates against issues of noise on a consistent basis, the policy approach draws on evidence base work.*
- 16.35 *Planning Practice Guidance: Noise expands upon the noise guidance of the NPPF. Specifically, it outlines the ‘agent of change’ principle; this being the position that development that would introduce a new land use (whether this is a noise sensitive use or a noise generating use) is responsible for managing the impact of that change. Paragraph 007 of PPG: Noise continues to recognise that Local Plans may include specific noise standards to apply to various forms of proposed development and locations in their area.*
- 16.36 *However, it is still recognised that the revocation of PPG24 (Planning and Noise) has resulted in an absence of technical guidance relating to noise. Whilst PPG24 provided guidance, through specific noise metrics, in relation to situations in which the onset of noise impact becomes significant, neither PPG: Noise, nor the Noise Planning Policy Statement for England (2010) provide technical noise metrics that define the different levels at which noise represents a planning consideration. However, given the diverse range of noise sources in Crawley (including the airport, rail, motorway, and Manor Royal) detailed technical guidance is required to facilitate the interpretation of Local Plan Policy EP4.*
- 16.37 *ProPG: Planning & Noise – New Residential Development (May 2017) sets out principles of good acoustic design. It recognises the importance of designing out the adverse effects of noise at an early stage, using a holistic design process that creates places that are both comfortable and attractive to live in, where acoustics are considered integral to the living environment.*
- 16.38 *Technical guidance on noise impact is set out in the Local Plan Noise Annex. This draws upon evidence and the PPG24 Noise Exposure Categories as a technical starting point, to provide guidance in assessing the acceptability of development proposals in noise*

terms. The predicted noise contours associated with a possible wide-spaced southern runway at Gatwick Airport are set out in Figure 1 of the Local Plan Noise Annex. These contours, which are the same as those identified in Plan 31 of the Gatwick Airport Master Plan 2019 (Air Noise Map – Additional Runway – Summer Day - 2040), will be used for the purpose of determining planning applications where aviation noise is a consideration, unless otherwise indicated by the Local Planning Authority. Should the contours shown in Noise Annex Figure 1 be superseded by more up-to-date noise contours, it will be for the Local Planning Authority to decide whether these are appropriate for use in planning decisions. In the event that updated noise contours are confirmed, notification of these changes will be published on the council's website.

- 16.39 Where a Noise Impact Assessment is required, consideration should be given to Planning Noise Advice Document, Sussex (~~2021~~ 2023 or latest revision) which has been produced on a joint basis by East and West Sussex local authorities. This has been produced to provide clear and consistent guidance as to the level of information that should be submitted with planning applications for noise generating developments or noise sensitive developments, including guidance on when it is appropriate to submit a noise report and the required content of such a report.

## Air Quality

- 16.40 Air Quality in the borough is mainly good, with national targets being met for all pollutants with the exception of nitrogen dioxide (NO<sub>2</sub>) at a small number of locations including the designated Air Quality Management Area (AQMA). Following exceedance of the objective levels for NO<sub>2</sub> close to Three Bridges Station, the AQMA was extended in 2021 to incorporate this newly identified area<sup>164</sup>. A key contributor to poor air quality in these areas is emissions from all types of vehicles along busy roads and commuter routes.
- 16.41 In addition to traffic, air quality can be affected by a number of pollutant sources, including industrial, commercial and domestic. New development can contribute to local emissions and have an impact on local air quality. Therefore, it is important that opportunities are taken to improve local air quality conditions, and as a minimum, mitigate the impacts of the development through good design and sustainable building measures that promote good air quality. It is important to ensure that development that is intended to reduce greenhouse gas emissions and fuel consumption is not unintentionally detrimental to local air quality. Development in or close to an AQMA should prioritise generation of heat and power through means that do not influence air quality and minimise emissions to air from combustion.
- 16.42 Therefore, it is vital that the maintenance and where possible improvement of air quality is appropriately factored into the location, design and operation of development. The overarching objective is to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by air pollution. To help achieve this, the Local Plan draws upon national and local guidance, including any subsequent Air Quality Supplementary Planning Document (SPD).
- 16.43 The 'Air Quality & Emissions Mitigation Guidance for Sussex' (2021 or latest edition), is a local guidance document produced by Sussex Air Quality Partnership and signed up to by East and West Sussex local authorities to ensure that a consistent cross-authority approach is applied to the consideration of air quality in planning applications. The document identifies situations in which planning applications should be supported by

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<sup>164</sup> Air Quality Annual Status Report (Crawley Borough Council, 2021)

an Emissions Mitigation Assessment and/or an Air Quality Impact Assessment, and details the provision and type of mitigation that will be required.

### **Policy EP5: Air Quality**

People's health, quality of life and the wider environment shall be protected from the significant adverse effects of atmospheric pollution.

Development should help to improve air quality and enhance the environment. New and existing development will be prevented from contributing to, being put at risk from, or being adversely affected by atmospheric pollution. To achieve this, development will be required to prevent, or where this is not practicable, minimise the generation of pollutants that would result in a deterioration in air quality and to prevent exposure to poor air quality.

To ensure that air quality is appropriately taken into account in the planning of development, applicants will adhere to national and local guidance, including the Local Plan Planning Obligations Annex and Air Quality and Emissions Mitigation Guidance for Sussex (2021 or latest version) which should be used to identify if:

- a) an Emissions Mitigation Statement is required as part of a planning application;
- b) an Air Quality Impact Assessment is required as part of a planning application.

To reduce the overall background levels of pollution, sustainable design principles shall be incorporated into the development to ensure that the residual local emissions of air pollution are prevented or, where this is not practicable, minimised. This shall include high standards of insulation, the selection of low emission technology for heating and power; and the provision of facilities for sustainable transport including electric vehicle charge infrastructure and charge points.

Planning permission will only be granted where it can be demonstrated that the development:

- i. has appropriately factored air quality into the location, design and operation of development, and where necessary, provided appropriate mitigation; and
- ii. will not result in a deterioration of air quality within an AQMA; and
- iii. will not lead to the declaration of a new AQMA; and
- iv. does not conflict with the requirements of an air quality action plan; and
- v. will not result in an increase in exposure within an AQMA.

#### **Odour**

Where amenity sensitive development is proposed within 800 metres of a Waste Water Treatment Works an Odour Impact Assessment will be required as part of the planning application. This should confirm that either there will be no adverse amenity impact for occupiers of the proposed development, or demonstrate how appropriate mitigation will be provided to ensure the development is appropriate in amenity terms.

#### **Development of Industrial and Commercial Use**

Development that includes industrial and commercial land uses must submit appropriate detailed evidence to enable assessment of potential significant adverse air quality impacts. Mitigation measures should be included in proposals where evidence suggests a likely significant adverse effect.

### ***Reasoned Justification***

16.44 *The council has responsibility to ensure that poor air quality does not negatively affect the public health or the environment, both within and beyond the borough boundary, and for this reason it is important that the Local Plan is pro-active in supporting the improvement of air quality.*

- 16.45 *The NPPF is clear that planning decisions must contribute to and enhance the natural and local environment, and ensure that development is appropriate to its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment. This is expanded upon through the Planning Obligations Annex and Planning Practice Guidance: Air Quality (2021), which outlines how Local Plans may consider air quality, having regard to the type of development and where it is proposed, and measures for offsetting air quality impacts that may arise from new development.*
- 16.46 *Air Quality & Emissions Mitigation Guidance for Sussex enables the Local Plan to apply a pro-active approach to ensure that development is appropriately planned to take account of air quality, and provides suitable mitigation where air quality is a material consideration. Applicants will be required to refer to the checklists contained within the Guidance to identify if the development being proposed will require supporting information in the form of an Emissions Mitigation Statement, and if required, an Air Quality Impact Assessment. Through this approach, the Local Plan will be able to ensure that development has regard to the air quality impacts that may arise from it, having regard to its scale and location.*
- 16.47 *The purpose of the Emissions Mitigation Statement is to quantify the additional transport emissions created by the development to determine the appropriate level of mitigation that is required to avoid, minimise or offset the impact of the development on air quality. The emissions calculator contained within the document enables the estimation of the monetary value of potential damage from the development caused by nitrogen dioxide and particulate pollutants. The identified figure is the minimum sum that must be spent on practical mitigation measures, which will be implemented as part of the development, following agreement with the Local Planning Authority. The preference will be that mitigation is provided on-site by the developer. If it is not feasible to provide on-site mitigation, an equivalent financial contribution will be sought, to be secured by way of a S106 Agreement.*
- 16.48 *The purpose of the Air Quality Impact Assessment is to determine the significance of the predicted impact of the development. Where an Air Quality Impact Assessment is required, applicants are expected to complete the assessment in accordance with the Institute of Air Quality Management (IAQM) Planning Guidance<sup>165</sup> and should liaise directly with the council's Environmental Health team.*
- 16.49 *Where development is proposed in close proximity to an existing Waste Water Treatment Works, it is important that consideration is given as to whether the proposed development is appropriate, due to the risk of odour nuisance. The Odour Impact Assessment should be undertaken by the developer in liaison with the water infrastructure provider. It should determine if the proposed development would expose future occupiers to an unacceptable amenity impact, and if necessary, detail how mitigation will be provided as part of the development to ensure an appropriate amenity environment for occupiers.*

### **External Lighting**

- 16.50 *Crawley is identified as having one of the highest levels of light pollution in Sussex<sup>166</sup>. As a predominantly urban area with a major international airport and a number of employment locations, it is necessary that urban areas of the borough are appropriately*

<sup>165</sup> available at: <https://crawley.gov.uk/sites/default/files/2021-03/Land%20Use%20Planning%20%26%20Development%20Control%20-%20Planning%20for%20Air%20Quality.pdf>

<sup>166</sup> Campaign to Protect Rural England (Representation to Local Plan, 2019)

lit, particularly given the number of shift workers living in the borough. However, it is important that Crawley's green infrastructure and countryside areas outside the built up area boundary are not exposed to inappropriate light pollution, in order to retain the intrinsic character and beauty of these locations.

### Policy EP6: External Lighting

Development must demonstrate how it will minimise light pollution so as to avoid significant harm to biodiversity **and public and highway safety**, and prevent unacceptable sky glow, glare, light spillage and unnecessary energy usage.

Development will normally be permitted where:

1. the minimum amount of lighting necessary to achieve its purpose is specified; and
2. outdoor lighting is well designed, low impact, and appropriate in terms of its intensity, height, and use of fittings and structures; and
3. outdoor lighting does not cause unacceptable detriment to public and highway safety, nor biodiversity, in particular priority habitat and species.
4. The design and specification of the lighting minimises sky glow, glare and light spillage in relation to local character, the visibility of the night sky, the residential amenities of adjoining occupiers, and public safety; and
5. Low energy lighting is used; and
6. Where lighting of a landmark feature is proposed, the level and type of illumination would enhance the feature itself.

Further information on lighting is provided in the Urban Design Supplementary Planning Document.

#### **Reasoned Justification**

16.51 *The NPPF requires that planning policies and decisions should, amongst other things, “limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”<sup>167</sup>. Within Crawley it is essential that an appropriate balance is struck between ensuring that development is appropriately lit to maximise principles of good design and reducing the fear of crime, whilst avoiding poorly thought out or obtuse angled lighting that would detract from the night-time environment. Particular caution should be applied where lighting is proposed within and adjacent to Crawley's countryside or where this could negatively impact upon the setting of green infrastructure within Crawley's built up area, where unsympathetic lighting can have an urbanising effect that detracts from the asset.*

16.52 *Crawley is also committed to reducing carbon emissions. High energy lamps and poorly designed lighting schemes result in overconsumption of energy with consequent unnecessary carbon emissions.*

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<sup>167</sup> National Planning Policy Framework, paragraph 185 (c) (2021) MHCLG

## Sustainable Transport

- 17.1 The retention of existing transport infrastructure and the provision of additional facilities and services to support new development is a key objective of the planning system. It is important to retain, and where possible enhance, opportunities in the borough for increasing active travel and public transport use, as an alternative to the car, taking into account new innovations and the need to respond to climate change.
- 17.2 It is important that the council continues to work closely with West Sussex County Council, National Highways and public transport operators to ensure that the necessary physical transport infrastructure is in place for the lifetime of the Plan.

### Chapter Content

- 17.3 This chapter sets out the Local Plan policies and approach to ensure sufficient transport infrastructure is in place to meet the needs of the existing and future population. General, social and green infrastructure are covered in separate chapters earlier in this Local Plan.

### The Key Issues

- 17.4 Crawley's population is still growing, two new neighbourhoods are being added to the town and additional housing sites are proposed in this Local Plan. Growth in employment numbers and at Gatwick Airport is also anticipated. Therefore, it is important to ensure that the key transport network is improved and, if necessary, expanded to meet the needs of the town.

### Local Plan Policies

#### Sustainable Transport

- 17.5 Developments normally generate additional traffic and create new access requirements. The location of development and the intensity of the usage are the two crucial variables that will ultimately determine whether developments are sustainable in terms of the local or regional transport network. Therefore, developments, if positioned in sustainable locations, can provide tangible opportunities to improve the wider transport network.
- 17.6 Furthermore, the NPPF states that plans should endeavour to minimise the need to travel and maximise the use of sustainable transport modes. In Crawley, the public transport system is accessible and extensive, and moreover, the distances needed to travel are relatively short, owing to the compact nature of the town. This provides an opportunity for cycling and walking to be an attractive form of transport.

#### Strategic Policy ST1: Development and Requirements for Sustainable Transport

Development should be located and designed so as to encourage travel via the walking and cycling network and public transport routes, while reducing dependency on travel by private motor vehicle (also see Chapter 4). This should include:

- i. Designing developments to prioritise the needs of pedestrians, cyclists and users of public transport over ease of access by the motorist;
- ii. Providing an appropriate amount and type of parking in accordance with Policy ST2;

- iii. Phasing the development process so that walking and cycling infrastructure forming part of the development is in place and usable at the point of first occupation;
- iv. For development which generates a significant demand for travel, and/or is likely to have other transport implications: contributing to improved sustainable transport infrastructure off-site, including, where appropriate, bus priority measures, enhanced passenger information, and routes identified in the council's Local Cycling and Walking Infrastructure Plan, especially in the areas identified in Policy CL3 as appropriate for Moderate and High Density residential form;

Developments should meet the access needs they generate and not cause an unacceptable impact in terms of increased traffic congestion or highway safety. Developments will be considered acceptable in highways terms unless there would be an unacceptable impact on highway safety, or the cumulative impact on the transport network is severe and cannot be satisfactorily mitigated.

In order to consider such impacts, developments that generate a significant amount of movements (thresholds as outlined in the Local List of Planning Requirements) should be supported by a:

- a) Transport Statement, which assesses the impact of a development with relatively small transport implications, and a Travel Plan Statement, which identifies how the development will maximise the usage of sustainable modes of transport as opposed to the private motor vehicle; or a
- b) Transport Assessment, which assesses the impact of a development when there are significant transport implications ([including consideration of the requirements of Policy IN1: Infrastructure Provision](#)), and:
  - for large developments (for example, large-scale major residential developments or any strategic developments), a Mobility Strategy; or,
  - for other developments, a Travel Plan.

The Mobility Strategy or Travel Plan will identify:

- how the development will optimise the usage of sustainable modes of transport as opposed to the private motor vehicle;
- appropriate improvements to sustainable modes, or the introduction of new infrastructure that is required to adequately mitigate development impacts and detail how this will be delivered and operated.

The applicant should view the Local List of Planning Requirements (or any subsequent document) to ensure that they submit an appropriate Transport Statement or Transport Assessment with their planning application.

### **Reasoned Justification**

17.7 *In line with the current NPPF, this Policy reflects the approach that developments which generate a significant amount of movement should be situated in sustainable locations. Sustainable locations are defined as sites which minimise the need to travel, such as the Town Centre, and also takes advantage of the opportunities to utilise and enhance public transport and both the cycling and walking network. As a consequence, it is considered appropriate that large retail, commercial, employment or leisure developments should be concentrated in locations where an existing transport infrastructure can sustain such developments for the long-term. It is envisaged that such a policy will encourage modal change, particularly to public transport, cycling and walking which will subsequently reduce greenhouse gas emissions and the use of private motor vehicles.*

- 17.8 *In order to promote sustainable development, the Policy further supports the national planning policy objectives of identifying and pursuing opportunities to promote walking, cycling and public transport use; providing for high-quality walking and cycling networks; and ensuring that the design and access arrangements of new developments give priority first to pedestrian and cycling movements. National policy objectives are further outlined in [by the Department for Transport in Circular 01/2022: Strategic road network and the delivery of sustainable development, and in ~~Department for Transport's~~ Gear Change: a vision for cycling and walking which expects “sustainable transport issues to be considered from the earliest stages of plan-making and development proposals, so that opportunities to promote cycling and walking are pursued”<sup>168</sup>. Planning policies are to provide for high quality cycling and walking networks, green spaces and green routes, and supporting facilities such as cycle parking \(drawing on Local Cycling and Walking Infrastructure Plans\). The design requirements to achieve this are set out in Policy CL3.](#)*
- 17.9 *For major developments with operational transport needs a planning obligation will be sought towards identified sustainable transport infrastructure schemes in accordance with Policy IN1 and the Planning Obligations Annex to the Plan. Additional obligations may be sought in relation to Travel Plan/Mobility Strategy measures.*
- 17.10 *Where required a Mobility Strategy should seek to plan in a positive and integrated manner for the full access requirements of a development according to Mobility as a Service (MaaS) principles.*
- 17.11 *Starting from this basis and with the support of Travel Plans and Mobility Strategies, where required, developments should mitigate transport impacts according to the following hierarchy:*
- *reduce overall travel demand;*
  - *minimise mode share by private car;*
  - *seek to spread or time shift demand away from peak hours;*
  - *offset residual impact through highway improvements, which must be achieved with no adverse impact on highway safety or to users of sustainable modes.*

## **Parking**

- 17.12 Parking standards are essential in terms of ensuring that developments have a satisfactory provision of car parking spaces and cycle parking spaces, but also to ensure that the more sustainable modes of transport are still prioritised.
- 17.13 In addition, the older residential neighbourhoods, where modern parking needs of residents were not foreseen when the neighbourhoods were first developed, have limited on-street car parking spaces available. However, owing to the limitations of the highway network and the ever increasing need to retain environmental assets and open space, it is considered that policies contained within the Local Plan should continue to concentrate on more sustainable modes of transport in order for the town to accommodate a growing travel demand.
- 17.14 Where parking is provided, it is important that it should be of a type appropriate to the anticipated demand. This should include meeting anticipated demand for Electrical Vehicle (EV) Charging Infrastructure, which is set to increase in light of the Government’s ‘Road to Zero’, and plans to phase out petrol and diesel cars by the

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<sup>168</sup> Gear Change A bold vision for cycling and walking, page 26, (2020) DFT



middle of the century<sup>169</sup>. The provision of EV charging infrastructure in Crawley is further supported by West Sussex County Council's 2019 Guidance on Parking in New Developments and emerging EV Strategy<sup>170</sup>.

### Policy ST2: Car and Cycle Parking Standards

Development will be permitted where the proposals provide the appropriate amount and type of car and cycle parking (~~including electric vehicle charging infrastructure~~) to meet its needs when it is assessed against the borough council's car and cycle parking standards. These standards are contained in the Parking Standards Annex to this Plan.

Car parking standards for residential development are based on the accessibility of the area, the levels of car ownership, and the size of any new dwellings.

Parking standards for other types of developments will be based on the particular usage of the premises, which will take account of the intensity and requirements of each use and the accessibility of an area by public transport and other sustainable modes.

#### Reasoned Justification

- 17.15 *In accordance with the NPPF, Local Authorities are encouraged to ensure the appropriate levels of parking are provided, and to seek to enhance the quality of parking, particularly in the Town Centre, to ensure that it is convenient, safe and secure. This Policy will seek to improve parking throughout the town via the assessment of parking standards for developments (or existing developments that increase floor space and/or intensify the permitted usage), which ensures that the appropriate level of cycle and car parking will accompany all planning applications that are permitted.*
- 17.16 *Parking standards for both residential and non-residential development are set out in the Parking Standards Annex to the Plan. In line with the NPPF, the parking standards take into account the accessibility of the development through the use of zones and reflect the ability of certain areas to accommodate further parking spaces. In addition, the particular type, mix and usage of the site will have a bearing on the number of parking spaces that any planning application will require. With these parking standards, an appropriate number of both cycle and car parking spaces will be provided, alleviating congestion.*

#### Rail Stations

- 17.17 The main rail stations provide highly sustainable opportunities for major development and are fundamental to ensuring that sustainable modes of transport are utilised. However, it is important that such development opportunities should reflect the function and operation of the particular stations concerned. The key stakeholder operating the rail stations, Network Rail, is also committed to improving Gatwick Airport and Three Bridges rail stations over the Plan period, with major improvements being progressed for both. Improvements have recently been made at Crawley station, with further transport interchange and public realm improvements planned.

<sup>169</sup> The Road to Zero: Next steps towards cleaner road transport and delivering our Industrial Strategy (2018) DFT

<sup>170</sup> Guidance on Parking at New Developments (2019) WSCC

### Policy ST3: Improving Rail Stations

Any improvements or developments at or within the vicinity of railway stations will be expected to enhance the specific roles of the individual stations, the sustainable access to individual stations, and:

- a) at Gatwick Station, support its function as an airport-related interchange and provide opportunities for broadening the function of the station as an interchange for surface travellers using rail, coach, Fastway and other buses consistently with the safe and efficient operation of the airport;
- b) at Three Bridges Station, support its role as a potential parkway station and as a major interchange between the rail, bus, highway, cycle and pedestrian network;
- c) at Crawley Station, support its role as a major gateway to the Town Centre and improve its integration with the main shopping area and bus station and accessibility by cycle and pedestrians;
- d) at Ifield Station, strengthen its role as a local suburban station meeting the needs of current and future residents in the west of the town.

For further policy guidance relating to land close to the borough's rail stations, please see Policy CL4.

#### **Reasoned Justification**

17.18 *This Policy endeavours to ensure that the specific function of each rail station within the borough is enhanced:*

- *Gatwick rail station is in a highly strategic location for transport, not only within the borough, but for the wider South East region. A major improvement project commenced in 2020, and it is important to continue to seize opportunities for any further improvements for broadening the function of the station as an interchange, to include additional surface travellers, particularly those who use sustainable modes of transport, such as rail or buses. Further improvements to the station's concourse and access may be necessary to support any increases in passenger numbers at the airport in the future.*
- *Three Bridges rail station is a major rail junction for both the Brighton main line and the Bognor Regis/Southampton rail line. As a major transport interchange for commuters, it is envisaged that the station can better serve those using buses, cycles and the highway network. An improvement project is being progressed.*
- *Crawley rail station acts as a major gateway into the Town Centre, and thus, it is important to support the station's integration into the main shopping area and with the bus station through environmental improvements and high-quality urban design. Residential-led redevelopment of the station and car parks has planning permission and station improvements have been made with public realm improvements to both the rail and bus station being progressed.*
- *At Ifield rail station, the development of the Kilnwood Vale neighbourhood and any future proposals to the west of the town (in Horsham district) means it is important to strengthen the role of this suburban rail station in order to meet the needs of any increases in rail patronage.*

17.19 *The NPPF states that Local Plans should allow authorities to identify priority areas for infrastructure provision and/or environmental enhancements to support sustainable economic growth. It is integral for both Crawley and Three Bridges rail stations to have*

*improvements or developments within the locality, in order to ensure that opportunities are exploited for the use of sustainable transport, which coincides with Policy ST1.*

### **Alignment for New Multi-Modal Transport Link**

- 17.20 The Transport Modelling undertaken for the Crawley Borough Local Plan Review has identified a number of junctions within the borough which are already at capacity or require mitigation following new development. This is based on the quantum of development already coming forward in Crawley, and that being delivered through the adopted Mid Sussex District Plan, Horsham District Planning Framework and Reigate and Banstead Core Strategy and Development Management Plan. Further major development is being promoted to the west of Crawley, through the Horsham District Local Plan Review, and Gatwick Airport's Master Plan 2019 anticipates significant growth in passenger numbers at the airport, even just on a single runway. The cumulative impact of these developments will exacerbate existing capacity issues on roads within Crawley.
- 17.21 Therefore, it is considered necessary to undertake further strategic transport assessment considering the cumulative impacts of development across the area. Due to the potential levels of development, it is considered appropriate that the council identifies an area of search within Crawley for a potential full Western Multi-Modal Transport Link, in partnership with West Sussex County Council. This will need to connect to a route corridor within Horsham district, identified by Horsham District Council, to the west.

#### **Strategic Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link**

The Local Plan Map identifies an Area of Search for a Crawley Western Multi-Modal Transport Link connecting the A264 with the A23.

The design and route of the Western Multi-Modal Transport Link must take account of:

- a. its impact on (but not limited to):
  - 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.
- b. the desirability and requirements of bus priority measures (including future proofing for forecast traffic growth and congestion).
- c. [land safeguarded at Gatwick Airport for potential future southern runway expansion.](#)
- d. [protected sites and habitats, through identification of the potential impacts on these.](#)

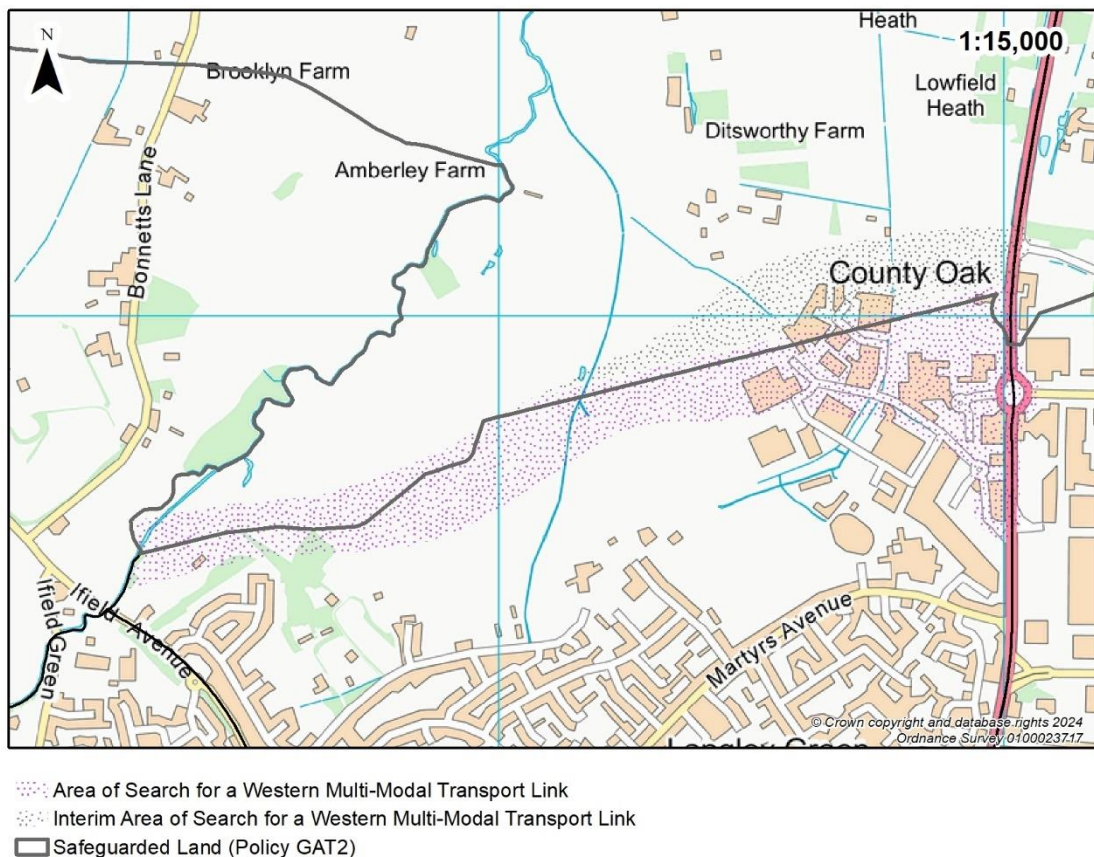
Connectivity by non-vehicular modes of transport between Crawley's urban neighbourhoods and the wider Sussex countryside should be maintained and enhanced.

### **Reasoned Justification**

- 17.22 *The Western Multi-Modal Transport Link should provide a new strategic transport link for travel from the west, and from Kilnwood Vale and any new development west of Crawley*

to link directly with the A23 north of County Oak serving Manor Royal and Gatwick. This will remove the need for this traffic to come further east into Crawley and travel around all the roundabouts accessing Crawley's western neighbourhoods to link with the A23, a route which is known to be increasingly congested at peak times.

17.23 The provision of a full Western Multi-Modal Transport Link between the A264, west of Kilnwood Vale, and the A23 (North of County Oak), associated with significant strategic development to the west of Crawley, outside the borough's administrative boundary, is necessary to reduce existing congestion on the A2220 and A23, remove through traffic from the neighbourhood junctions and residential roads, reduce inappropriate usage and increased levels of traffic on rural routes to Gatwick Airport, and reduce pressure on the M23 Junctions 10 and 11. It will also help mitigate the surface access impacts of growth at the Airport, provide alternatives to help address the impacts from permitted new developments (Kilnwood Vale, Pease Pottage and North Horsham) and from potential future developments on the western side of Crawley. It is anticipated that detailed impacts of further development onto the Crawley road network would be modelled through the Horsham District Local Plan Review process.



**Figure 28: Area of Search for a Crawley Western Multi-Modal Transport Link Corridor**

17.24 Without commitment to the construction of a full Western Multi-Modal Transport Link between the A264 and A23 (North), all the traffic from any development to the west of Crawley, from permitted schemes and any future proposals which could emerge through the Horsham District Plan Review and/or through planning applications permissions granted as windfalls, is likely to feed into residential roads in Ifield and/or Langley Green and onto the already congested A23 junctions, particularly the Ifield Avenue/A23 junction in the long term. New highways crossing the Ifield Brook Meadows and Rusper Road Playing Fields Local Green Space would be wholly unacceptable,

*given the impact this would have on ancient woodland, the biodiversity in the LWS and LNR, the character of Ifield Village Conservation Area, the flood plain and the recreational use of the Local Green Space.*

- 17.25 *A Western Multi-Modal Transport Link would enable the prioritisation of connectivity by more direct routes for public transport, cycling and walking into Crawley from any new development to the west, with vehicular traffic having to take a longer route along the Western Link. Existing Public Rights of Way should be designed into the road, with safe, accessible and convenient road crossing opportunities provided. New opportunities for walking, cycling and horse riding links should be explored.*
- 17.26 *Land was previously safeguarded for a Crawley Western Relief Road as part of the West of Bewbush Joint Area Action Plan (Policy WB23) because, whilst the Transport Assessment for Kilnwood Vale did not demonstrate it was necessary to serve that development alone, it was considered that it might be needed to serve future development west of Crawley, or wider sub regional objectives.*
- 17.27 *The proposed Area of Search partially overlaps the area of land safeguarded for a potential future southern runway at Gatwick Airport. The council is engaging with Gatwick Airport and West Sussex County Council about the partial overlap of these two areas, with the aim of minimising the impact on residents living close to the route and reducing the need for land to be compulsorily purchased.*
- 17.28 *An initial scoping study has been undertaken on behalf of the council to refine the Area of Search within Crawley and to consider its extent into land safeguarded for a potential future southern runway at Gatwick Airport. This study was undertaken for the purpose of facilitating the refinement of the Area of Search shown on the Local Plan Map to support further work to be carried out in the future by the appropriate body responsible for delivery of the route. Such further work would include identifying and assessing specific route alignments and then progressing the development of a multi-modal transport link should significant strategic development to the west of Crawley's administrative boundaries come forward. The route options identified throughout the study are indicative only for the purposes of assessing a reasonable range of possible options, and do not suggest a preferred or final route option in any case.*
- 17.29 *The work carried out as part of the study significantly reduced the overlap into safeguarding for much of the Area of Search length, encroaching only where there is scope for the route to be compatible with the safe operation of an additional wide-spaced southern runway. The study indicates potential examples where the route could fall outside of the safeguarded land completely, should this be necessary.*
- 17.30 *This is with the exception of the eastern end, where an alternative Area of Search is suggested for the interim period unless and until such a time when a southern runway is pursued by Gatwick Airport. The provisions of a route for the Crawley Western Multi-Modal Transport Link in this interim Area of Search would offer opportunities to maintain the full capacity of the transport corridor without impact on any existing commercial properties within County Oak. However, 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 should a southern runway at Gatwick Airport be progressed. Discussion and agreement with Gatwick Airport Limited will form an essential part of this further work.*

**17.31 The Area of Search is located mainly outside the Built-Up Area Boundary, within the Upper Mole Farmlands Rural Fringe, and includes areas of known environmental constraints including, but not limited to, the River Mole floodplain, ancient**

**woodlands, biodiversity opportunity areas, local open spaces, local natural reserves, local wildlife sites and structural landscaping. The requirements and expectations of the other policies in this Local Plan and in national policy relevant to these constraints will apply in the circumstances of route identification and design for the Crawley Western Multi-Modal Transport Link.**

17.3<sup>4</sup><sub>2</sub> *There may be a need for land to be compulsory purchased in order to deliver the scheme once a route has been defined.*

## Appendix A: Sustainability Objectives

1. To minimise climate change, by taking actions to reduce the concentration of greenhouse gasses in the atmosphere.
2. To adapt to the effects of climate change, by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change.
3. To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings.
4. To ensure that everyone has the opportunity to live in a decent and affordable home.
5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.
6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.
7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.
8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.
9. To promote healthy, active, cohesive and socially sustainable communities. To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.

	Significant Positive Impact on the sustainability objective (++)
	Positive Impact on the sustainability objective (+)
	Possible Positive or Slight Positive Impact on the sustainability objective (+?)
	No Impact on the sustainability objective (0)
	Neutral Impact on the sustainability objective (/)
	Uncertain Impact on the sustainability objective (?)
	Possible Negative or Slight Negative Impact on the sustainability objective (-?)
	Negative Impact on the sustainability objective (-)
	Significant Negative Impact on the sustainability objective (--)

Local Plan Policy	SA Objective								
	1	2	3	4	5	6	7	8	9
SD1	++	++	++	+	+	++	++	++	++
SD2	+?	0	0	0	0	+	+	+	+
CL1	+	+	++	++	+	+	++	++	++
CL2	++	++	++	++	+	++	++	+	++
CL3	++	++	+	++	+	+	++	++	++
CL4	++	++	/	++	+	?	++	+	+
CL5	++	++	++	++	+	++	++	+	+
CL6	+?	++	++	+	+	++	+	+	++
CL7	+	0	++	+	0	++	0	0	+
CL8	+?	/	++	/	/	+	+	/	+
CL9	/	/	+	/	/	++	/	+	+
DD1	++	++	+?	+?	/	+?	+	+	+
DD2	0	0	+?	++	+?	0	+?	/	++
DD3	++	+?	0	++	0	0	+	0	+
DD4	++	++	++	/	/	++	+	/	+
DD5	0	0	++	+	+	0	0	0	++
DD6	0	0	++	0	+	++	0	0	+
DD7	?	-	?	0	0	+	-	0	0

Local Plan Policy	SA Objective								
	1	2	3	4	5	6	7	8	9
HA1	0	?	++	0	/	0	0	0	+
HA2	0	?	+	0	/	0	0	0	+
HA3	0	?	++	0	0	+	0	0	+
HA4	0	?	+	0	/	0	0	0	+
HA5	0	?	++	0	/	0	0	0	+
HA6	0	0	++	0	/	+	0	0	+
HA7	0	??	+	0	/	+	0	0	+
OS1	+	+	+	+	+	++	+	+	++
OS2	+	++	+	0	/	+	+	++	++
OS3	+	0	+	0	0	+	++	+	++
IN1	+	+	0	+	+	+	+	++	+
IN2	+	+	/	0	+	+	+	+	+
IN3	+	+	+	+	+	??	+	++	+
EC1	?	?	+	+	++	??	+	+	++
EC2	+	+	+	+	++	+	+	+	++
EC3	??	??	++	0	++	0	+	+	+
EC4	?	??	??	??	++	-	??	+	??
EC5	+	+	+	+	++	0	+	0	+
EC6	+	?	+	0	++	0	0	0	+
EC7	+	+	+	0	+	0	++	0	0
EC8	0	0	0	0	+	0	??	0	0
EC9	0	0	0	0	++	0	0	0	+
EC10	0	0	+	0	+	0	0	0	+
EC11	0	0	++	++	++	0	?	?	+
EC12	+	+	++	?	+	0	++	++	++
EC13	+	0	+	0	+	-	0	+	0
GAT1	-?	?	0	0	++	??	??	??	0
GAT2	??	??	??	??	++	-?	??	+	??
GAT3	-	-	0	0	/	-?	-	/	0
GAT4	0	0	0	0	+	0	+	0	0
TC1	0	0	??	+	++	0	++	+	++
TC2	+	??	+	+	+	0	+	++	++
TC3	+	+	++	++	++	0	++	+	++
TC4	??	??	++	0	0	0	0	0	++
TC5	++	+	++	0	++	0	++	+	+
H1	/	/	/	-?	-?	/	/	/	/
H2	0	+	+	+	0	+	+	+	++
H3	0	??	++	+	0	++	0	?	++
H3a	+	+	++	++	0	/	0	0	++
H3b	0	/	++	+	0	++	0	0	+
H3c	0	/	++	+	++	0	++	/	++
H3d	0	0	++	++	0	0	++	++	+
H3e	++	0	+	++	++	0	+	0	++
H3f	0	+	+	+	0	++	0	++	++
H4	0	0	0	+	0	0	0	0	+
H5	0	0	0	++	++	0	0	0	++
H6	0	0	0	++	++	0	0	0	++
H7	+	+	+	++	+	0	0	0	+
H8	0	0	?	+	0	-	0	0	+
H9	0	0	0	+	0	0	0	0	+
GI1	++	++	++	0	0	++	++	++	++
GI2	++	+	+	/	/	++	/	/	+
GI3	++	++	++	/	/	++	0	+	+
GI4	+	??	0	0	0	++	0	++	++
SDC1	++	++	??	++	++	??	0	0	++
SDC2	++	0	0	+	+	0	0	+	??
SDC3	+	++	0	+	0	++	0	0	+
SDC4	++	++	0	-	-	++	0	0	+



Local Plan Policy	SA Objective								
	1	2	3	4	5	6	7	8	9
EP1	0	++	++	?	?	++	0	+	+
EP2	/	+	0	0	0	+	0	+	+
EP3	++	++	++	+	0	+	0	0	++
EP4	0	0	0	++	+	0	0	0	++
EP5	++	++	0	0	0	++	0	0	++
EP6	++	++	++	+	0	+	0	0	++
ST1	+	+	+	+	+	+	++	+	+
ST2	+	/	+	+	+	+	++	++	+
ST3	+	+	+	0	+	0	++	+	+
ST4	-	-	/	+	+	-	-	++	-

## Appendix B: Supporting Guidance Documents

### Crawley Borough Council Documents

Crawley 2030: Crawley Borough Local Plan 2015 – 2030, 2015

Crawley Local Plan Map, 2015

Crawley CIL Charging Schedule, 2016

Crawley Regulation 123 List, 2016

Manor Royal Design Guide Supplementary Planning Document, 2013

Manor Royal Public Realm Strategy, 2013

Planning and Climate Change Supplementary Planning Document, 2016

Green Infrastructure Supplementary Planning Document, 2016

Town Centre Supplementary Planning Document, 2016

Urban Design Supplementary Planning Document, 2016

Affordable Housing Supplementary Planning Document, 2017

CIL Supporting Document: Instalments Policy, 2016

CIL Supporting Document: Discretionary Social Housing Relief, 2016

CIL Supporting Document: Developer Contributions Guidance Note, 2016

Guidance Note: Energy and Water Efficiency for Alterations and Extensions to Buildings, 2016

Affordable Housing: Summary Guidance Document for Small Residential Developments, 2017

Tinsley Lane Development Brief, 2017

Breezehurst Drive Playing Fields Development Brief, 2018

Brighton Road Conservation Area Statement, 2018

Dyers Almshouses Conservation Area Statement, 2018

Forestfields and Shrublands Conservation Area Statement, 1998

Gossops Green Neighbourhood Centre Conservation Area Statement, *to be prepared*

Hazelwick Road Conservation Area Statement, 2019

High Street Conservation Area Statement, 1998

Ifield Village Conservation Area Statement, 2018

Malthouse Road Conservation Area Statement, *to be prepared*

Queens Square and The Broadway Conservation Area Statement, *to be prepared*

St Peter's Conservation Area Statement, 2005

Southgate Neighbourhood Centre Conservation Area Statement, *to be prepared*

Sunnymead Conservation Area Statement, 2004

Worth Conservation Area Statement, 2018

Crawley Borough Council Climate Emergency Action Plan, 2021

Infrastructure Funding Statement, 2022

Air Quality Management Plan, *anticipated 2021*

HMO Space Standards, 2013

Employment Land Trajectory, Base Date: 31 March 2023

Housing Trajectory, Base Date: 31 March 2023

Strategic Flood Risk Assessment, ~~2020~~ 2023

Local Plan Noise Annex, ~~2020~~ [2024](#)  
Local Plan Planning Obligations Annex, ~~2020~~ [2024](#)  
Local Plan Parking Standards Annex, ~~2020~~ [2024](#)  
New Directions Crawley Transport Strategy, 2020  
Crawley LCWIP: Local Cycling and Walking Infrastructure Plan, 2021  
2022 Legal Agreement between CBC, WSCC and the airport operator  
One Town Crawley Economic Recovery Plan, 2021  
[Employment Land Availability Assessment, 2023](#)  
[Crawley Infrastructure Delivery Schedule, 2023](#)  
[Crawley Infrastructure Delivery Schedule, 2023](#)

### **Other Professional Guidance Documents**

European Directive 2001/42/EC  
Localism Act 2011  
Planning and Compulsory Purchase Act 2004  
Town and Country Planning Act 1990  
Environment Act 2021  
Levelling Up White Paper, DLUHC, 2022  
The Town and Country Planning (Local Planning) (England) Regulations 2012  
Environmental Assessment of Plans and Programmes Regulations 2004  
National Planning Policy Framework MHCLG, 2021  
Planning Practice Guidance MHCLG, 2014 and subsequent updates  
'Affordable Homes Update', Written Ministerial Statement, 24 May 2021  
'Planning Update', Written Ministerial Statement, 25 March 2015  
The Building Regulations 2010  
Building Regulations Approved Document L: Conservation of fuel and power, DLUHC, 2022  
Building Regulations Approved Document M: Access to and use of buildings, DLUHC, 2021  
Building Regulations Approved Document O: Overheating, DLUHC, 2022  
Building Regulations Approved Document S: Infrastructure for electric charging vehicles, DLUHC, 2022  
Gatwick 360° Strategic Economic Plan Coast to Capital Local Enterprise Partnership, 2018  
UK Industrial Strategy: Building a Britain Fit for the Future 2017  
Local Industrial Strategy Coast to Capital, 2020  
Gatwick Diamond Local Strategic Statement 2017  
West Sussex Waste Local Plan WSCC, 2014  
West Sussex Joint Minerals Local Plan WSCC and SDNP, 2018 ([Partial Review 2021](#))  
National Model Design Code, DLUHC, 2021  
Living with Beauty: Final report of the Building Better, Building Beautiful Commission, MHCLG, 2020  
Technical Housing Standards – Nationally Described Space Standards MHCLG, 2015  
Site layout planning for daylight and sunlight: a guide to good practice BRE, 2022  
Planning Practice Guidance: Housing and Economic Needs Assessment MHCLG, 2019  
Planning Policy for Traveller Sites MHCLG, 2015

**West Sussex Joint Strategic Needs Assessment (JSNA) “People and Places”** WSCC 2019

**National Design Guide: Planning practice for beautiful, enduring and successful places** MHCLG 2019

**Building for a Healthy Life Design for Homes**, 2020

**National Model Design Code (NMDC)** MHCLG, 2021

**Urban Design Compendium** HCA 2013 and English Partnerships 2007

**Understanding Place: Historic Area Assessments** Historic England, 2017

**Urban Characterisation** Historic England, 2019

**Secured by Design** Police Crime Prevention Initiatives Limited, 2021

**By Design – Urban Design and the Planning System** DETR

**Creating successful masterplans, a guide for clients** 2008/09 CABE

**Understanding Historic Buildings: A Guide to Good Recording Practice** Historic England, 2016

**Historic Environment Good Practice Advice Planning Note 3: The setting of Heritage Assets** Historic England, 2017

**Active Design Guidance** Sport England and Public Health England, 2015

**Essex Design Guide** Essex Local Authorities Essex Planning Officers Association, 2018

**Residential Developments and Trees: A Guide for Planners and Developers** The Woodland Trust, 2019

**AOA Technical Aerodrome Safeguarding Advice Notes** Airport Operators Association

**Safely Landed? Is the current aerodrome safeguarding process fit for purpose?** Lichfields, 2018

**Dementia and Town Planning RTPI Practice Advice** RTPI, 2017

**Accessible Natural Green Space Standards in Town and Cities** Natural England, 2011

**Space for People, Targeting Action for Woodland Access** The Woodland Trust, 2017

**Natural England Standing Advice**

**Natural Environment and Rural Communities Act 2006**

**Biodiversity 2020** Defra

**Planning & Energy Act 2008**

**Housing Standards Review Consultation** Department for Communities and Local Government, 2013

**Housing Standards Review Technical Consultation** Department for Communities and Local Government, 2014

**The Business Case for Green Building** World Green Building Council. 2013

**Technical Guidance to the National Planning Policy Framework** Department for Communities and Local Government, 2012

**Zero Carbon Homes – Impact Assessment** Department for Communities and Local Government, 2011

**BREEAM New Construction: Non-Domestic Buildings Technical Manual** BRE Global Ltd, 2018

**LEED 2009 for New Construction and Major Renovations Rating Systems** U.S. Green Building Council, 2009

**[Letter to Local Planning Authorities, Water Efficiency in New Homes, 1 September 2022, DEFRA](#)**

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**Water Stressed Areas – Final Classification** Environment Agency, ~~2013~~[2021](#)

**Environment Agency Flood Map for Planning** Environment Agency, updated quarterly

**Delivering Sustainable Drainage Systems** DEFRA, 2014

**Local Flood Risk Management Strategy** WSCC, 2013

**West Sussex LLFA Policy for the Management of Surface Water** WSCC, 2018

**Accessible Natural Green Space Standards in Town and Cities** Natural England, 2011

**Space for People, Targeting Action for Woodland Access** Woodland Trust, 2017

**Pollinator Action Plan 2019 – 2022** WSCC, December 2018

**Dementia and Town Planning RTPI Practice Advice 2017** RTPI, 2017

**Planning Noise Advice Document: Sussex** East and West Sussex Authorities, 2021

**Air Quality and Emissions Guidance for Sussex** Sussex Air, 2020

**Land-Use Planning and Development Control: Planning for Air Quality** Institute of Air Quality Management, 2017

**West Sussex Energy Study** AECOM Limited, 2013

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**The Road to Zero: Next Steps towards cleaner road transport and delivering our Industrial Strategy** 2018

**West Sussex Transport Plan 2022-2036, West Sussex County Council, 2022**

**Guidance on Parking at New Developments** WSCC, 2019

**Gear Change A Bold Vision for Cycling and Walking, DfT, 2020**

**Aviation Policy Framework, DfT, March 2013**

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**Flightpath to the Future, DfT, May 2022**

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[British energy security strategy, BEIS, 2022](#)

[Net Zero Strategy: Build Back Greener, BEIS, 2021](#)

[Environmental Noise and Effects on Sleep: An Update to the WHO Systematic Review and Meta-Analysis, Smith \*et al\*, 2019](#)

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Habitat Regulations Assessment of the Crawley Borough Local Plan (2023) Crawley Borough Council

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A Strategy for West Sussex Landscape (2005) West Sussex County Council

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Trees in the Townscape: A Guide for Decision Makers (2012) Trees and Design Action Group  
High Weald Area of Outstanding Natural Beauty Management Plan 2019 – 2024 (2019) AONB Unit

Crawley Conservation Areas and Non-Designated Assets Review (2020) Place Services  
Crawley ASEQs and Locally Listed Buildings Heritage Assessment (2010) Alan Baxter  
Historic Parks and Gardens Review (2013) Sussex Gardens Trust

Crawley Open Space, Sport and Recreation Assessment: Open Space Study (2020) The Environment Partnership

Crawley Open Space, Sport and Recreation Assessment: Indoor Sport Facilities Study (2020) Strategic Leisure Limited (SLL)

Crawley Open Space, Sport and Recreation Assessment: Playing Pitch Strategy (2020) 4Global  
Crawley Open Space Study (2013) JPC Strategic Planning and Leisure Limited

Crawley Playing Pitch Assessment (2013) JPC Strategic Planning and Leisure Limited

Crawley PPG17 Open Space, Sport and Recreation Assessment (2008) PMP

Crawley Borough Play Strategy and Development Plan 2007-2010 Crawley Borough Council

Crawley Borough Playing Pitch Strategy for Outdoor Sports (2005) Crawley Borough Council

West Sussex Rights of Way Improvement Plan 2018 – 2028 (2018)

Draft Infrastructure Plan (2023) Crawley Borough Council

## **ECONOMIC GROWTH & SOCIAL MOBILITY**

Northern West Sussex Economic Growth Assessment: Supplementary Update for Crawley (2023) Lichfields

Northern West Sussex Economic Growth Assessment (2020) Lichfields

Northern West Sussex Economic Growth Assessment: Focused Update for Crawley (2020) Lichfields

Crawley Economic Growth Assessment Update (2015) NLP

Northern West Sussex Economic Growth Assessment (2014) NLP

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Employment Land Review Part 1 (2009) GL Hearn

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Manor Royal Economic Impact Study (2018) Lichfields

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Crawley Manor Royal: Final Report (2008) Regeneris

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[Jet Zero: Modelling Framework, DfT March 2022](#)  
Gatwick Airport Interim Parking Strategy (April 2017)  
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2019 Gatwick Airport Master Plan  
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Retail Capacity Update (2013) DTZ  
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[Crawley College Campus Master Plan \(2022\)](#)

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Market Housing Mix (2016) Chilmark Consulting  
Starter Homes Needs and Implications (2016) Chilmark Consulting  
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Planning and climate change in Crawley (2007) Energy Centre for Sustainable Communities

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Environment Agency Flood Map for Planning, Environment Agency

Water Stressed Areas – Final Classification (Environment Agency, ~~July 2013~~ [2021](#))

Crawley Borough Council Strategic Flood Risk Assessment (SFRA) (~~2020~~ [December 2023](#)) JBA

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Water Neutrality Study: Part A – Individual Local Authority Areas (July 2021) JBA

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PROPG: Planning and Noise (2017)

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[Topic Paper 7: Development and Noise Technical Appendix \(December 2023\)](#)

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[Control Flow HL2024: Final Report on Crawley Borough Council Pilot \(September 2022\)](#)

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[Natural England Addendum to Position Statement \(November 2022\)](#)

[British energy security strategy \(BEIS, 2022\)](#)

[Net Zero Strategy: Build Back Greener \(BEIS, 2021\)](#)

[Environmental Noise and Effects on Sleep: An Update to the WHO Systematic Review and Meta-Analysis \(Smith \*et al.\*, 2019\)](#)

[Building Regulations Approved Document O: Overheating \(HM Government, 2010\)](#)

[Crawley Infrastructure Delivery Schedule – December 2023 \(CBC, 2023\)](#)

[Crawley Infrastructure Delivery Schedule – October 2023 \(CBC, 2023\)](#)

[Crawley Borough Council CIL Charging Schedule 2016 \(CBC, July 2016\)](#)

[Northern West Sussex Statement of Common Ground July 2023 \(July 2023\)](#)

[Delivering schools to support housing growth \(DfE, August 2023\)](#)

[Crawley Transport Modelling Study TN01 Comparison of Trip Ends in NTEM June 2023 \(Stantec, August 2023\)](#)

[Crawley Transport Modelling Study TN02 GAL Sensitivity Test June 2023 \(Stantec, August 2023\)](#)

[Crawley Transport Modelling Study TN03 Gatwick Green Trip Generation Comparison June 2023 \(Stantec, August 2023\)](#)

[Horsham and Crawley Joint Assumptions Transport Note \(Stantec, June 2021\)](#)

## Glossary

### Definitions

Active Frontages	Street frontages where there is an active visual engagement between those in the street and those on the ground floors of buildings. This quality is assisted where the front facade of buildings, including the main entrance, face and open towards the street. The objective of achieving active frontages can be realised through a variety of means. Overall, the desirable outcome is avoiding blank walls and increasing visual interest and activity and improving surveillance.
Active Travel	Active travel means making journeys by physically active means such as walking or cycling. These are usually shorter journeys, like walking or cycling to the shops, walking the kids to school, cycling to work, or cycling to the station to catch a commuter train. For many people this offers a convenient and accessible way to build physical activity into their lives.
Affordable Housing	<p>Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.</p> <p>See also: Affordable Rented Housing; Intermediate Housing; and Social Rented Housing.</p> <p>Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.</p>
Affordable Rented Housing	Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).
Air Quality Management Area	An area designated by the council because it is likely not to achieve national air quality objectives by the relevant deadlines.
Airport-Related Parking	Parking that is provided for those who travel to the airport by private vehicle for flights. Airport-related parking includes parking associated with hotel guests leaving cars whilst flying from the airport.
Ancient Woodland	An area that has been wooded continuously since at least 1600AD.

Area Action Plan	An optional development plan document. An AAP provides specific planning policy and guidance for a particular location or an area of significant change.
Area-Based Character Assessment (ABCA)	Key baseline evidence which should pinpoint the position, function and extent of various character positive components and defining characteristics of the area, such as its historic, landscape and townscape features, especially the following structural components: movement routes (paths); linear boundaries (edges); character areas; strategic points (inc. movement nodes); and landmarks. It should identify how places are experienced and perceived by both residents and visitors, by identifying framed views and panoramic vistas and significant locally distinctive patterns, the local vernacular, and other landscape and architectural features. Output will need to be communicated at different scales and differing levels of detail.
Areas of Special Local Character	Designated areas that are considered to be of distinctive character or quality and therefore worthy of protection through rigorous control of new development, yet do not quite comply with the criteria for designation as Conservation Areas.
Article 4 Direction	A direction which withdraws automatic planning permission granted by the General Permitted Development Order.
B Use Classes/Business floorspace/Business Uses	Business: B1a, B1b, B1c; General Industry: B2; and Storage or Distribution: B8, as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended).
Biodiversity Net Gain	An approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand. Biodiversity Net Gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off -site or through a combination of on -site and off- site measures.
BRE Environmental Assessment Method (BREEAM)	A BREEAM assessment uses recognised measures of performance, which are set against established benchmarks, to evaluate a building’s specification, design, construction and use. The measures used represent a broad range of categories and criteria from energy to ecology. They include aspects related to energy and water use, the internal environment (health and well-being), pollution, transport, materials, waste, ecology and management processes.
Building Regulations	National Standards, separate to the planning system designed to uphold standards of public safety, health, and construction.

Built-Up Area Boundary	This is the boundary around the area defined in the Local Plan as being built up, distinguishing it from the countryside.
Carbon Neutral	The term given to achieving net zero carbon emissions by balancing the amount of carbon released with an equivalent amount sequestered or offset.
Climate change adaptation	Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which moderate harm or exploit beneficial opportunity.
Climate change mitigation	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
Commission for Architecture and the Built Environment (CABE)	The organisation was the government’s advisor on architecture, urban design and public space in England. Its function was to influence and inspire those making decisions about the built environment. It championed well-designed buildings, spaces and places; ran public campaigns; and provided expert, practical advice. In April 2011 the Design Council and CABE came together as one organisation.
Community Infrastructure Levy	A levy allowing local authorities to raise money from owners or developers of land undertaking new building projects in their area in order to fund improvements to local infrastructure.
Conservation (for heritage policy)	The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.
Conservation Area	Areas of special architectural or historical interest, the character or appearance of which it is important to preserve or enhance.
Core Strategy	The central planning document in the Local Development Framework. This system of planning policy was replaced when the NPPF was published.
Countryside	The area outside of the built up area boundary.
Council	Where the “council” or the “borough council” is used it generally relates to Crawley Borough Council, unless it is specified otherwise.
COVID-19	The highly contagious respiratory Corona Virus Disease 2019, declared a pandemic by the World Health Organisation on 11 March 2020, meaning it had spread worldwide.
Crawley	Where "Crawley" is used, it generally relates to the area that is within Crawley Borough Council's administrative boundary.

Crossovers	A vehicular access from the highway over a pavement or verge to the curtilage of a property.
Decentralised/District Energy Networks	Local renewable energy and local low-carbon energy usually but not always on a relatively small scale encompassing a diverse range of technologies.
Design Code	A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.
Design Concept	The basic design ideas on which a proposal will be based, often expressed in a combination of words and visual material.
Design Guide	A document providing guidance on how development can be carried out in accordance with good design practice, often produced by a local authority.
Development	For the purposes of policy interpretation, all reference to “Development” that is made within the Crawley Local Plan, including reference to “Development Proposals”, “Development Schemes”, “Proposals” or “Schemes”, is as per the statutory definition of development set out in Section 55 of the Town and County Planning Act 1990.
District Heating Priority Areas	Designated areas within Crawley that have particular potential for the establishment of decentralised energy networks.
Edge of centre	For retail policy purposes, edge-of-centre sites are locally defined as those sites falling outside of the Primary Shopping Area, though within the Town Centre Boundary, as identified on the Local Plan Map. For all other Main Town Centre Uses, the NPPF definition of edge of centre applies.
<a href="#">Education</a>	<a href="#">Facilities catering to any/all educational needs including Further and Higher, Secondary, Primary, Early Years, and Special Educational Needs and Disability</a>
Exceptionally significant development	Development which is of national importance.
Embedded carbon/greenhouse gasses	The carbon emissions generated in the supply chain for that item/product, in order to both create it and move it to where it will be used or sold. It includes the emissions created in extracting and transporting the raw materials required to make the product, the emissions from the manufacturing process, and sometimes also the emissions generated in transporting the final product to the point of sale or use.
Employment Uses	Uses as defined within the Use Classes Order that generate employment such as leisure, retail and all B use class development. This does not include any residential uses.

Exception Test	<p>The Exception Test should be applied if, following application of the Sequential Test (Flood Risk), it is not possible for the development to be located in zones with a lower probability of flooding. For the Exception Test to be passed it must be demonstrated that:</p> <ol style="list-style-type: none"> <li>1. The development provides wider sustainability benefits to the community that outweigh flood risk; and</li> <li>2. That the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.</li> </ol>
First Homes	<p>First Homes are a specific kind of discounted market sale housing and should be considered to meet the definition of ‘affordable housing’ for planning purposes. Specifically, First Homes are discounted market sale units which:</p> <ol style="list-style-type: none"> <li>a. must be discounted by a minimum of 30% against the market value;</li> <li>b. are sold to a person or persons meeting specified First Homes eligibility criteria;</li> <li>c. on their first sale, will have a restriction registered on the title at HM Land Registry to ensure this discount (as a percentage of current market value) and certain other restrictions are passed on at each subsequent title transfer; and</li> <li>d. after the discount has been applied, the first sale must be at a price no higher than £250,000 (or £420,000 in Greater London).</li> </ol>
Form of Development	<p>The physical expression of urban design. It consists of the relationships, shape and size of buildings, structures and spaces. It will influence the users activity and movement in a place and so is fundamental to the success of a place.</p>
Frontages	<p>These have been identified locally to help maintain the balance between retail and non-retail uses in the town centre.</p>
Fuel Poverty	<p>A fuel poor household is one that cannot afford to keep adequately warm at reasonable cost. This is generally defined as households that need to spend 10% or more of their annual income on energy to keep their home adequately warm.</p>
Functional Floodplain	<p>Undeveloped land and open space that falls within Zone 3 of the Environment Agency Flood Map. Any areas of the borough that are identified as Functional Floodplain are at the greatest risk of flooding, and fairly regular inundation should be expected.</p>
Gatwick Airport Boundary	<p>The boundary within which airport-related uses are appropriate.</p>
Green Infrastructure	<p>A network of multi-functional green space and waterways and waterbodies, urban and rural, which is capable of</p>

	delivering a wide range of environmental and quality of life benefits for local communities.
Greenhouse Gas	Gases that act to trap heat within the earth's atmosphere, they are produced by burning fossil fuels but do also occur naturally.
Gypsy, Traveller and Travelling Showpeople	<p>Gypsies and Travellers are persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.</p> <p>Travelling Showpeople are members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.</p>
Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment	The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) is a technical study that forms part of the evidence base for the Local Plan. As required by the Housing Act (2004) this document assesses the accommodation needs of Gypsies, Travellers and Travelling Showpeople and outlines how their needs will be met.
Gypsy and Traveller "Pitch"	A 'pitch' refers to a pitch on a Gypsy and Traveller site that provides for residential uses. As a general guide and, in line with national guidance recommendations, the average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, a parking space for two vehicles and a small garden area. The amenity building must include, as a minimum, 'hot and cold water supply; electricity supply; a separate toilet and hand wash basin; a bath/shower room; a kitchen/dining area'. Taking into account the requirements listed above, and, considering the space standards of the borough in relation to the amenity building, an approximate figure of 160 m <sup>2</sup> for each pitch has been established.
Travelling Showpeople "Plot"	A 'plot' refers to a pitch on a Travelling Showpeople site (often called a yard) and refers to a mixed-use site suitable for both employment and residential activities.
Heritage Assets	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets either above or below ground and assets identified by the local planning authority (including local listing).



Heritage Impact Assessments	A document that is required as part of a planning application when the development affects a heritage asset, these were previously known as Heritage Statements.
Historic Parks and Gardens	Areas that encompass aesthetic, philosophical, botanic and scientific heritage and embody shared values of landscape and place.
House in Multiple Occupation	A house in multiple occupation (HMO) is a property that is occupied by a number of individuals who share facilities, or do not have exclusive occupation of the whole property. HMO's generally comprise accommodation where two or more individuals share basic amenities (bath/shower, WC or kitchen).
Housing Market Area	This is a geographical area which is relatively self-contained in terms of reflecting people's choice of location for a new home i.e. a large percentage of people settling in the area will have sought a house only in that area.
Important Views	Specific long or panoramic views of the town as identified through a character assessment of the Borough.
Infrastructure	Includes transport facilities; such as roads, rail stations and bus stations; utility services, including water supply and wastewater and its treatment; waste management and disposal; telecommunications infrastructure; social and community infrastructure such as educational facilities and health facilities, cultural facilities, sports and recreational facilities and open space, parks and play space, libraries, cemeteries, and places of worship; emergency services; and flood defences.
Infrastructure Plan	Local Planning Authorities are expected to work with other Local Authorities and infrastructure providers to assess the quality and capacity of infrastructure within the area, and its ability to meet forecast demands. The Infrastructure Plan will confirm the capacity of infrastructure required to meet the demands of growth within the town anticipated through the Local Plan, and moreover, any mitigation that may be required.
Infrastructure providers	Organisations responsible for the provision of certain types of infrastructure.
Intermediate Housing	Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definitions. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.
Large Developments	Thresholds for larger development, as referred to in Policies CL3 and ST1, include new residential development in excess of 80 units, or other types of development as per the thresholds outlined in the Local Validation Checklist: for

example, hotels, 100 beds or more, 50+ bed hospitals, B1 2500sqm, B2 4000sqm and B8 5000sqm.

Listed Buildings	Buildings which appear on a national list due to their special architectural or historic importance. The buildings are protected by law.
Local Biodiversity Action Plans	Each individual Species or Habitat Action Plan has a number of objectives, and details actions to be carried out in order to conserve and enhance populations of particular animal and plant species, or to protect and enhance valuable habitats.
Local Nature Recovery Strategies	Introduced by the Environment Act 2021. A new system of spatial strategies for nature, which will cover the whole of England. They are established by clauses 100 to 104 of the Environment Bill and are designed as tools to drive more coordinated, practical and focussed action to help nature. Strategies will be locally led and collaborative, led by a 'responsible authority'.
Local Plan	Is the term given to this document. In law this is described as a development plan document adopted under the Planning and Compulsory Purchase Act 2004. It guides development of the local area for the future and was drawn up by the local planning authority in consultation with the community.
Local Planning Authority	The public authority whose duty it is to carry out specific planning functions for a particular area. In this document it tends to refer to Crawley Borough Council.
Local Wildlife Sites	Locally Designated, by independent expert panel, Sussex-Wide sites of particular value for wildlife; previously known as Sites of Nature Conservation Importance. Adopted by local authorities for planning purposes and identified in the Local Plan.
Locally Listed Buildings	Buildings, or structures worthy of protection in the local context due to their historic interest, architectural interest, group and townscape value, intactness, and/or communal value.
Low Carbon Energy	A term attributed to energy generated in a way that produced very low levels of carbon per unit in relation to conventional energy generation techniques.
Low/Zero Carbon Development	Zero carbon developments achieve no net emissions by reducing carbon emissions through use of on-site renewable energy generation, and balancing any imports with exports to the National Grid to achieve a zero balance. Low carbon developments are similar to zero carbon developments, the only difference being that they need to achieve at least a 50% reduction in emissions (where this applies specifically to energy use in buildings).
Main Town Centre Uses	As defined by the NPPF: retail development (including warehouse clubs and factory outlet centres); leisure,

	entertainment facilities, the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
Major Development	<p>As defined by the Town and Country Planning (Development Management Procedure) (England) Order 2010, ‘major development’ means development involving one or more of the following:</p> <p>(a) the winning and working of materials or the use of land for mineral-working deposits;</p> <p>(b) waste development;</p> <p>(c) the provision of dwellinghouses where –</p> <p style="padding-left: 40px;">(i) the number of dwellinghouses to be provided is 10 or more; or</p> <p style="padding-left: 40px;">(ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);</p> <p>(d) the provision of a building or buildings where the floorspace to be created by the development is 1,000 square metres or more; or</p> <p>(e) development carried out on a site having an area of 1 hectare or more.</p>
Manor Royal	Manor Royal is the Gatwick Diamond’s leading business district. For the purposes of the Crawley Local Plan, reference to Manor Royal relates to the area defined as Manor Royal (Policy EC3) on the Local Plan Policies Map. As such, reference within the Local Plan to Manor Royal includes the areas known as Manor Royal Business District (as identified by the Manor Royal Business Group), County Oak (and surrounding employment land), and City Place.
Manor Royal Business District	This is the area of Manor Royal that is represented by the Manor Royal Business Group. This forms part of the wider Manor Royal Main Employment Area, alongside County Oak and City Place.
Modal change/shift	The switch between different forms of transport.
National Planning Policy Framework	Sets out the government's planning policies for England and how these are expected to be applied to produce distinctive local and neighbourhood plans that reflect the needs and priorities of their communities.
Nationally described standards	A series of standards that will be introduced at the national level for Local Authorities to adopt.

Neighbourhood	Crawley has grown up on a neighbourhood-by-neighbourhood basis known as the neighbourhood principle. Each neighbourhood is a large planned development, predominantly consisting of housing with a central shopping parade, supported by other facilities, services, and open space to meet the day-to-day needs of the people who live and work there.
Neighbourhood Centres	The area at the centre of a neighbourhood that forms a small economic and cultural core providing facilities for the residents of that neighbourhood.
Neighbourhood Plans	A plan prepared by a Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004). At present, there are no neighbourhood plans being progressed in Crawley.
Network Ready	Network ready, in relation to Decentralised Energy Networks, means that the development is optimally designed to connect to a District Energy Network on construction or at some point after construction, and include the incorporation of site-wide communal energy systems to serve all demand.
New Town	Crawley is known as a New Town, a product of the New Towns Act 1946. The New Towns consisted of a new community that was carefully planned from its inception and is typically constructed in previously undeveloped areas, or by merging several smaller built up areas. This contrasts with settlements that evolve over a long time period.
Noise Sensitive Development	Any dwelling, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other facility or area of high amenity, which may be susceptible to noise.  Also referred to as: Noise Sensitive Receptor.
Northern West Sussex	Primarily consisting of the three administrative areas of Crawley Borough, Horsham District and Mid Sussex District. As a Housing Market Area a small area of the southern part of Reigate and Banstead Borough also falls within this description.
Objectively Assessed Housing Need	The amount of new housing required over the Plan period which meets household and population projections and takes account of migration and demographic change (births and deaths). This previously was a process undertaken by individual local authorities. However, it is now calculated using the government’s national Standard Method.
Older People	“Older people” is usually the term for people ages 65+ years
Older People’s Housing	Specialist housing to meet the needs of older people; including: sheltered, enhanced sheltered, extra care, registered care, as well as bungalows and general housing,

	including step-free apartments, adapted to meet the needs of maximising the opportunities for assisting older people to retain their independence for as long as possible, including through meeting accessibility standards set out in Part M, category 3 of the Building Regulations.
Open Space Study	An assessment of the needs for open space, sports and recreation facilities and opportunities for new provision.
Open Spaces	Open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
Out of centre	Locations that are situated beyond the Town Centre Boundary, as identified on the Local Plan Proposals Map, are defined as out-of-centre.
Planning Condition	A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.
Planning Obligations	A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.
Playing Field	The whole of the site that encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2010.
Pollution	Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.
Previously developed sites	A site which is or was occupied by a permanent structure, including the curtilage of developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes land that has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.
Primary Shopping Area	A defined area where retail development is concentrated. In Crawley, this comprises the Primary Shopping Frontages,

and Secondary Shopping Frontages which are adjoining and closely related to the Primary Shopping Frontage.

Public Safety Zone	Public Safety Zones are areas of land at the ends of the runways at the busiest airports, within which development is restricted in order to control the number of people on the ground at risk of death or injury in the event of an aircraft accident on take-off or landing.
Public transport	The term used to refer to trains and buses and other communal forms of transport.
Radiant energy	The term is used particularly when radiation is emitted by a source into the surrounding environment. In this document it refers to the energy from the sun.
Renewable & low carbon energy	Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).
S106 Agreement	An agreement under Section 106 of the Town and County Planning Act which contains legally enforceable obligations to mitigate the impact of development proposals.
Safeguarded Land	Land that was required to be safeguarded by the Airports White Paper 2003, the Aviation Policy Framework 2013 and referred to in the draft Aviation Strategy: Aviation 2050 for the building of a wide spaced runway to the south of Gatwick Airport.
Safeguarded Zone	An area defined in Circular 01/03: Safeguarding of aerodromes. This enables the potential impact of development proposals on navigation systems and the safe operation of aircraft to be assessed.
Sequential Test (Flood Risk)	A national planning policy requirement that seeks to steer new development to areas with the lowest probability of flooding. In demonstrating that the requirements of the sequential test have been met, proposals should refer to the NPPF and Planning Practice Guidance, and the Environment Agency Flood Map.
Sequential Test (Main Town Centre Uses)	This applies to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. The test requires applications for main town centre uses to be located in town centres, then in edge-of-centre locations and only if suitable sites are not available should out of centre sites be considered.

Significant Development	This will generally refer to all proposals of significant scale in excess of 150 dwellings or 6,000sqm of commercial floorspace, or may be smaller developments in highly sensitive locations. It also applies to major development in any location where, within a 670 meter radius, cumulative or aggregate quantities of moderate density development comes forward at different sites during the plan period, which together exceed 150 dwellings or 6000sq. metres of commercial space, and/or where comprehensive development is considered particularly critical.
Sites of Nature Conservation Importance	Locally important sites of nature conservation adopted by local authorities for planning purposes and identified in the local development plan. Now known as Local Wildlife Sites.
Social Rented Housing	Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.
Standard Method	The government's expected approach to calculating the unconstrained local objectively assessed housing need for an area. The Method is set out in national Planning Practice Guidance. It involves setting a baseline, based on household growth projections and includes an adjustment for affordability. This does not produce the housing requirement.
Standing Structures	In the context of Heritage Assets these can be any type of built historic structure standing above ground including all types of building whether domestic, agricultural, industrial, military or transport-related and in whatever condition whether habitable, in use or ruined and only partially surviving. Such structures can also include street furniture (for example a historic lamp-post), monuments, headstones and war memorials.
Strategic Housing Land Availability Assessment	The Strategic Housing Land Availability Assessment (SHLAA) is a technical study that forms part of the Evidence Base for the Local Plan. It identifies potential housing sites and assesses whether these sites are developable, how many housing units could be accommodated on them and when they could be delivered.
Strategic Housing Market Assessment	The Strategic Housing Market Assessment is an evidence base document which assesses the housing needs of the area. The Strategic Housing Market Assessment identifies the scale and mix of housing and range of tenures that residents require.

Supplementary Planning Documents	Documents which expand upon identified Local Plan policies to provide more detailed guidance on how the policy should be interpreted and applied.
Sustainability Appraisal	Under the regulations of the Planning and Compulsory Purchase Act 2004, Crawley must undertake a Sustainability Appraisal (SA) of the Local Plan to satisfy independent examination to allow the Plan to be formally adopted. The SA is an ongoing process, which endeavours to identify the social, environmental and economic impacts of planning policies or allocations within a Local Plan.
Sustainable Development	Development that meets the social, economic and environmental needs of the present without compromising the needs of the future.
Sustainability Statement	A document submitted as part of a planning application that sets out how the development has or will achieve the objectives set out in Policy SDC1. The Planning & Climate Change Supplementary Planning Document provides detailed guidance on what should be included in the statement and the level of detail it contains will vary depending on the type and scale of the proposed development.
Sustainable Transport	Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport.
Sustainable Drainage Systems	Designed to control surface water runoff close to where it falls and mimic natural drainage as closely as possible.
Three Bridges Corridor	An area between Three Bridges Station and Crawley Town Centre that offers a selection of older and smaller employment units.
Town Centre	In retail policy terms, the Town Centre is represented by the Primary Shopping Area as identified on the Local Plan Map and defined above.
Town Centre Boundary	The Town Centre boundary is shown on the Local Plan Map, and defines the area within which main town centre uses are focused. It encompasses the Primary Shopping Area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.
Tranquil Areas	Areas sufficiently remote from the visual or audible intrusion of development or traffic to be considered unspoilt by urban influences.
Transport Modelling	A Transport Modelling Assessment is a technical study that forms part of the evidence base for the Local Plan, which assesses the future traffic impact resulting from traffic growth and development on the operation of roads, junctions and transport systems.



Urban Capacity Study	A technical study that forms part of the evidence base for Crawley's Local Plan. The document is used to assess potential employment and housing sites within the town.
Urban Design Compendium (UDC)	A key evidence base reference referred to in the National Design Guide and upon which the National Design Guide 10 characteristics of well-designed places are significantly based. Produced originally by the Homes and Communities Agency in 2007 and updated later in 2013.
Urban Greening Factor	A tool that evaluates and quantifies the amount and quality of urban greening that a scheme provides to inform decisions about appropriate levels of greening in new developments.
Use Class	Land uses as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended).
Viability	Where the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements, when taking account of normal cost of development and mitigation, provide competitive returns to a willing landowner to enable the development to be deliverable.
Water Neutrality	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.
Water Stress	Water stress occurs when the demand for water exceeds the available amount or when poor quality restricts its use.
Windfall Sites	Windfall sites are potential housing sites which have not been specifically identified as available in the Local Plan process. They normally comprise of sites that have unexpectedly become available for a residential use.

## Abbreviations

AAP	Area Action Plan
ABCA	Area Based Character Assessment
ANPS	Airports National Policy Statement
<del>AONB</del>	<del>Area of Outstanding Natural Beauty</del>
ASAS	Airport Surface Access Strategy
ASLC	Area of Special Local Character
AQMA	Air Quality Management Area
BID	Business Improvement District
BNG	Biodiversity Net Gain
BREEAM	BRE Environmental Assessment Method
BUAB	Built-Up Area Boundary
C2C	Coast to Capital (LEP)
CAA	Civil Aviation Authority
CABE	Commission for Architecture and the Built Environment
CHP	Combined Heat and Power
DCLG	Department for Communities and Local Government
DCO	Development Consent Order
DECC	Department of Energy and Climate Change
Defra	Department of Environment, Food and Rural Affairs
DLUHC	Department for Levelling Up, Housing and Communities
DPD	Development Plan Document
DfT	Department for Transport
EA	Environment Agency
EGA	Economic Growth Assessment
ELAA	Employment Land Availability Assessment
ELT	Employment Land Trajectory
EU	European Union
EV	Electric Vehicle
FRA	Flood Risk Assessment
HER	Historic Environment Record
HMO	Houses in Multiple Occupation
HMA	Housing Market Area
LCWIP	Local Cycling and Walking Infrastructure Plan
LDS	Local Development Scheme
LEED	Leadership in Energy and Environmental Design
LEP	Local Enterprise Partnership
LNP	Local Nature Partnership

LNRS	Local Nature Recovery Strategies
MHCLG	Ministry for Housing, Communities and Local Government
mppa	Million Passengers Per Annum
NDG	National Design Guide
NIC	National Infrastructure Commission
NMDC	National Model Design Code
NPPF	National Planning Policy Framework
NSIP	Nationally Significant Infrastructure Project
NWS	Northern West Sussex
OIS	Offsetting Implementation Scheme (water neutrality)
PPG	Planning Practice Guidance
PSZ	Public Safety Zone
S106	Section 106 Agreements (see “Planning Obligations” definition)
SA/SEA	Sustainability Appraisal/Strategic Environmental Assessment
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
UDC	Urban Design Compendium
UGF	Urban Greening Factor
WSCC	West Sussex County Council

## Crawley Local Plan Planning Obligations Annex

The Crawley Local Plan ~~2024~~ 2023-40 makes provision to deliver a minimum of ~~5,000~~ 5,330 homes over the ~~next 16~~ 17 years of the Plan period and, with anticipated growth in employment numbers within the borough and at Gatwick Airport, this will place additional demands on infrastructure provision. Developers will, therefore, be expected to contribute to meeting the need for additional infrastructure generated by their development and ensuring cumulative effects are effectively mitigated.

### Planning Legislation

The statutory framework for planning obligations is set out in Section 106 of the Town and Country Planning Act 1990 as amended by Section 12 of the Planning and Compulsory Purchase Act 1991.

The Planning Act 2008 provides the enabling powers for local authorities to apply Community Infrastructure Levy (CIL) to development in order to support the provision of infrastructure in an area. The CIL Regulations 2010 (as amended) were introduced under this legislation.

CIL Regulation 122 sets out that, for a planning obligation to be used as a reason to grant planning application for development, or any part of a development, the obligation must be:

- Necessary to make the development acceptable in planning terms
- Directly related to the development, and
- Fairly and reasonably related in scale and kind to the development

### National Planning Policy Framework

The National Planning Policy Framework (NPPF) confirms that plans should set out the contributions expected from developments. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan (paragraph 34).

Paragraphs 55 – 58 of the NPPF further set out the requirements for use of planning conditions and obligations as part of decision-making. This confirms that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

The NPPF confirms that where up-to-date policies have set out the contributions expected from development, planning applications for developments that comply with them should be assumed to be viable.

### National Planning Practice Guidance

The National Planning Practice Guidance sets out further detail about the use of planning obligations. This confirms that policies for planning obligations should be set out in plans and examined in public. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. The guidance states that evidence of need at the plan-making stage ‘can be standardised or formulaic’, and that it ‘is not appropriate for plan-makers to set out new formulaic approaches to planning obligations in supplementary planning documents or supporting evidence base documents, as these would not be subject to examination.’

### Crawley Borough Local Plan ~~2024~~ 2023-40

The Crawley Local Plan Review contains policies which set developer requirements. In most instances, the first policy position is that these should be addressed through design and incorporated on site. However, it is accepted that, in some cases, this is unlikely to be feasible. On this basis, financial contributions will be calculated to support off-site provision elsewhere in order to mitigate the impacts of the development.

The Local Plan is supported by a Whole Plan Viability Study. This informed the council’s consideration of potential policies and CIL charging rates from a viability perspective whilst taking into account adopted national policies that may impact on development viability. It was an iterative process, in order to secure the optimum possible approach and ensure the Local Plan secures the necessary requirements in order to make development acceptable in planning terms whilst being viable and deliverable. The Study was updated in 2022 to take account of the additional requirements arising from the necessity to achieve water neutrality. Both studies conclude that, largely, across borough-wide schemes for mixed residential developments, viability is positive and would support the range of planning obligations anticipated by the Local Plan policies, along with Crawley’s Community Infrastructure Levy. For higher density developments on brownfield sites within the Town Centre, particularly, though, viability becomes a concern. On this basis, a bespoke approach has been taken to some of the Local Plan Policies for their application within the Town Centre. This has been carefully considered so as to not undermine the importance of the requirements in order to mitigate against the impacts of the development.

The policies identified in the Plan to have associated developer contributions include:

<b>Policy No.</b>	<b>Policy</b>	<b>Annex Page No.</b>
Policy IN1:	Infrastructure Provision	294
Policy DD1:	Normal Requirements of All New Development	295
Policy DD4:	Tree Replacement Standards	295
Policy OS2:	Provision of Open Space and Recreational Facilities	295
Policy OS3:	Rights of Way and Access to the Countryside	298
Policy EC3:	Manor Royal	298
Policy EC5:	Employment and Skills Development	299
Policy GAT1:	Development of the Airport with a Single Runway	302
Policy H2:	Key Housing Sites	302
Policy H5:	Affordable Housing	303
Policy H6:	Build to Rent	310
Policy GI1:	Green Infrastructure	310
Policy GI3:	Biodiversity and Net Gain	311
Policy SDC2:	District Energy Network	311
Policy SDC4	Water Neutrality	311
Policy EP5:	Air Quality	312
Policy ST1:	Development and Requirements for Sustainable Transport	313

This Annex sets out the calculations for determining the planning obligations and any associated financial contributions (where these are not associated with a case-by-case basis) from these. The council may conduct inflation reviews of the identified contribution levels from time to time to ensure the necessary infrastructure can be delivered.

#### [Supplementary Planning Documents \(SPD's\)](#)

This Annex should be read in conjunction with the Council’s Affordable Housing SPD, Urban Design SPD and Green Infrastructure SPD and their subsequent reviews. These documents

provide greater detail on how the contributions will be identified and where they will be directed.

### Council Expectations and Standards

Generally, unless otherwise agreed, the council will expect the following to be included in the S106 Agreement or Unilateral Undertaking with respect to the procedures for making commuted sum payments:

- The formulae as applied in calculating the amount to be paid as at the date of the application or the date of the Planning Committee resolution.
- Indexation from the date of the Resolution to Grant or Unilateral Undertaking until the date of payment. Indexation will be on an annual basis in accordance with the Retail Price Index.
- The applicant is to notify the council when the payment trigger is reached.
- Penalty interest to be payable on late payments.
- The council will have 10 years in which to spend the capital contribution.

The S106 or Unilateral Undertaking will contain a milestone that triggers the payment of the capital contribution, usually (but not necessarily always) this will be the carrying out of any Material Operation.

When the payment is triggered, the applicant should notify the council that payment is now due. On receipt of the notification, the council will issue an invoice for the amount payable, including any indexation.

### Standard Occupancy Calculations

Occupancy rates are set out in the table below. Where an outline application is made, the average occupancy rate of 2.5 persons (2011 Census) per dwelling will be used. These are applicable to a number of the contribution calculations for policies set out below, including open space, sustainable transport, and skills

<b>Residential Developments</b>	
<b>Dwelling Size</b>	<b>Occupancy</b>
Studio	1.0
1 bed	1.5
2 bed	2.5
3 bed	2.5
4+ bed	2.8
<b>Commercial Developments (per sqm)<sup>171</sup></b>	
Offices (Use Class E)	1 FTE job per 11m <sup>2</sup>
Industrial (Use Class B2 or E)	1 FTE job per 36m <sup>2</sup>
Warehouse & Distribution (Use Class B8)	1 FTE job per 80m <sup>2</sup>
High Street Retail (Use Class E)	1 FTE job per 19m <sup>2</sup>
Food Superstore (Use Class E)	1 FTE job per 17m <sup>2</sup>
Comparison Goods Superstore/Retail Warehouse (Use Class E)	1 FTE job per 90m <sup>2</sup>

<sup>171</sup> HCA Employment Density Guide 3<sup>rd</sup> Edition (November 2015)

Financial & Professional Services (Use Class E)	1 FTE job per 16m <sup>2</sup>
Restaurant & Café (Use Class E)	1 FTE job per 18m <sup>2</sup>
Hotels (Budget) (Use Class C1)	1 FTE job per 3 bedrooms
Hotels (General – 3 Star) (Use Class C1)	1 FTE job per 2 bedrooms
Hotels (4/5 Star) (Use Class C1)	1 FTE job per 1.5 bedrooms
Cinemas (Sui Generis)	1 FTE job per 90m <sup>2</sup>
Amusement and Entertainment (Use Class E or Sui Generis)	1 FTE job per 70m <sup>2</sup>
Sports Centres and Private Clubs (Use Class E or Use Class F2 or Sui Generis)	1 FTE job per 65m <sup>2</sup>

### Policy Contributions

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

Development will be permitted where it is supported by the delivery and maintenance of necessary infrastructure both on and off-site (Policy IN1).

For individual proposed developments this includes the provision of mitigation to avoid any substantial cumulative effects on the existing infrastructure services (Policy IN1).

The council will charge Community Infrastructure Levy (CIL) on development taking place within the borough in accordance with the council's adopted CIL charging schedule (Policy IN1).

Where appropriate, developer contributions will be sought in the form of planning obligations to address site specific issues, subject to the tests in the CIL Regulations (Policy IN1).

Infrastructure covers a wide range of services and facilities including:

- Transport (covered more in Policy ST1)
- Education
- Health
- Social infrastructure
- Community facilities
- Cultural facilities
- Sports and recreation centres and facilities
- Open space (covered more in Policies OS1, OS2 and OS3)
- Parks and play space (covered more in Policies OS1 and OS2)
- Waste management and disposal
- Libraries
- Cemeteries
- Emergency services
- Places of worship
- Utility services
- Waste water treatment
- Telecommunications Infrastructure (covered more in Policy IN3)
- Flood defences.

It is a fact that development will place additional demands on infrastructure provision and that developers will be expected to contribute to meeting the need for additional infrastructure generated by their development and ensuring the cumulative effects are effectively mitigated.

The borough council will charge developers the Community Infrastructure Levy (CIL) on development, in accordance with the council’s adopted CIL Charging Schedule and the CIL Regulations (2010) as amended.

Section 106 agreements will address relevant site specific issues in accordance with the statutory tests set out in CIL Regulation 122, and the policies identified in this annex.

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

Proposals must be supported by a future management and maintenance plan for all shared hard and soft landscaping, semi-public or semi-private areas to ensure these areas become well-established (Policy DD1).

Streetscene improvements, public art, CCTV and access and safety measures (such as fire hydrants), or contributions towards these, will be sought on a site specific basis in accordance with policy and relevant service requirements (Policy DD1).

Public art can highlight what is special or locally distinctive about an area and create cultural assets that help in the creation of interesting streets and spaces.

Major developments will be required to allocate a sum equivalent to 1 per cent of build costs to the commissioning of public art work to be included as part of the scheme, or else as a commuted payment towards offsite provision of public art, where viability allows.

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

Where development proposals would result in the loss of trees, the number of replacements is based on the size of tree to be lost, as set out in Policy DD4.

Where commuted sums are sought in lieu of on-site provision, these will be based on the cost on a per tree, taking account of constraints to planting.

The cost of off-site planting will be based on the cost of a sixteen to eighteen centimetre girth tree measured at 1.5m off the ground, planting, sundries and watering over a five year period.

Where tree planting will occur within a hard paved area, the additional cost of construction for a tree pit must be funded.

The contribution covers the cost of providing the tree pit (where appropriate), purchasing, planting, protecting, establishing and initially maintaining the new tree.

The “open ground” contribution will apply where development results in the loss of council-owned trees in open ground and where the development results in the loss of trees on the development site, and it is unable to provide the required replacement tree planting on site. The council will plant the replacements in a location that contributes to the character and appearance of the borough and regains loss of biodiversity.

The “hardstanding” contribution will apply where new tree planting in hard standing is required off-site to mitigate the impact of development.

Tree in open ground (no tree pit required)	£700
Tree in hard standing (tree pit required)	£3,319

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

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



replacement open space and to provide and improve the Public Rights of Way network both within the development and connecting to the surrounding countryside (Policy OS2).

Existing playing fields and pitches, unless demonstrated to be surplus to requirements through the evidence base (Playing Pitch Study), are to be replaced with equivalent or better provision in terms of quantity and quality and in a suitable location. Where the council agrees that on-site provision of open space cannot be reasonably provided, the council will seek a financial contribution towards enhancement of existing facilities in order to mitigate the increased demand.

The additional demand for open space, sport and recreation facilities created by new residential development is to be mitigated and addressed through either:

- on-site provision of open space, where the characteristics and location of housing sites allow this to be appropriate; or
- alternatively, where it is agreed this cannot reasonably be provided on-site, as a financial contribution towards the enhancement of existing facilities (or new provision through changing the typology of an open space site) in order to mitigate the increase demand.

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

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

The table below is a guide as to whether a housing proposal may generate a need for new on-site provision:

Type of Provision	1-9 dwellings	10-49 dwellings	50-199 dwellings	200+ dwellings	Town Centre Residential
Play Space	X	✓	✓	✓	✓
Amenity Green Space	X	✓	✓	✓	✓
Outdoor Sports Space	X	*	✓	✓	*
Allotments	X	*	✓	✓	✓
Parks and Recreation Grounds	X	*	*	✓	X
Natural Green Space	X	*	*	✓	X
<b>KEY:</b>					
X S106 contributions not normally sought.					
* Contribution towards off-site provision may be required.					
✓ On-site provision of facility may be required.					

Higher density development within the Town Centre will be expected to consider opportunities to provide on-site amenity open space, play space and community food growing space. A financial contribution will be expected, proportionate to the associated anticipated increase in

population generated by the development, towards strategic sports pitch and ancillary facilities provision. Taking viability into account, higher density town centre developments will not be expected to provide a contribution towards parks and recreation spaces or natural green space. Imaginative design solutions suitable for high density, Town Centre style developments should be considered in meeting the biodiversity net gain requirement on-site (Policy GI3). Where provision of any of the open space typologies required from higher density development is agreed cannot reasonably be provided fully on-site, the council will seek financial contributions.

Contributions for proposals under 10 dwellings will not normally be sought. Whilst these developments will have a small cumulative impact on open space it is not generally expedient to consider on a case-by-case basis as required by the CIL regulations test for planning obligations. In these cases, high quality on-site amenity open space and hard and soft landscaping will be essential as part of the design and layout of the proposal.

Contributions towards children’s play space will be expected from all new residential units on schemes of ten dwellings or more. Studio and 1-bed units have an anticipated occupancy calculation of 1 and 1.5 persons respectively. However, this does not negate the council’s view that children are often residents of such properties<sup>172</sup>, and in these cases, access to high quality outdoor play space located close to the property is arguably even more critical for the quality of life.

The Table below can be used to calculate the contributions required towards off-site provision.

Type of Provision	A	B	C
	Standard m <sup>2</sup> per person	Cost per m <sup>2</sup>	Contribution per person (A x B)
Play Space	0.7	£170	£119
Amenity Green Space (0.2ha min)	4.5	£15	£67.50
Outdoor Sports Space	12.5	£21	£262.50
Allotments	1.5	£30	£45
Parks and Recreation Grounds	13	£72	£936
Natural Green Space	10	£15	£150
Maintenance	Where the council adopts areas of open space, sport and recreational provision, contributions will be sought towards their maintenance to cover a period of 10 years.		

Cost per m<sup>2</sup> is to be used when on-site provision can be provided that partly meets requirements but a contribution towards off-site provision should also be sought, where possible, to meet requirements in full. The following formula will be used to determine outstanding costs:

$$(overall\ requirement\ m^2 - on-site\ provision\ m^2) \times cost\ per\ m^2 = outstanding\ contribution$$

<sup>172</sup> Census 2011 records the presence of 575 dependent children permanently resident in studio or single bedroom flats in Crawley, and given worsening affordability in the subsequent period it is considered likely that this number has increased since then.

On-site provision and/or contributions towards Amenity Green Space and Natural Green Space can form part of proposals to meet Biodiversity Net Gain requirements for a development (as established by Policy GI3).

Management and maintenance arrangements must be agreed with the council and secured to ensure the long-term usability of the site. In the first instance, the developer is expected to maintain on-site open space provision for up to 10 years, after which arrangements must be put in place for a management company and/or third party to manage the space in perpetuity.

If the developer does not wish to assume responsibility for maintaining the open space, the council may be willing to accept a commuted sum and make arrangements for management of the open space through the council or a third party. Adoption will be subject to the council being satisfied that the facility meets the quality requirements of the council. It is therefore important to agree the specification of the open space/facilities with council at an early stage in the planning process. The Table below provides an indication of the costs of maintaining the different types of open space. The exact maintenance sum will need to be agreed with the council as part of the S106 discussions.

<b>Typology</b>	<b>Annual Cost 2013/14 (£/m<sup>2</sup>)</b>
Children & Young People’s Space	£3.67
Parks and Recreation Grounds	£2.20
Outdoor Sports Space	£0.92
Amenity Green Space	£0.62*
Natural Green Space	£0.42
Allotments	£0.13
*maintenance varies significantly, dependent on the exact specification of the space.	

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

Proposals which detract from the character of a right of way or other type of recreational route must adequately mitigate the impacts or provide a new resource of equal or better value (Policy OS3).

This may include the provision of safe and convenient links to nearby rights of way/recreational routes, and/or new or upgraded existing rights of way to multi-functional routes including environmental functions and visual amenity to create benefits for a range of users (Policy OS3).

### **Policy EC3: Manor Royal**

To support ongoing improvements to the Manor Royal environment, a developer contribution will be sought towards public realm improvements.

Where developments involve a net increase in gross internal area in excess of 100sqm, the council will seek a proportionate contribution of £2 per square metre of additional floorspace (GIA) towards public realm improvements in Manor Royal. This will be used towards specified projects identified by the council in liaison with Manor Royal BID, subject to appropriate projects being identified.

It is recognised that for smaller development where the financial contribution sought would be £500 or less, the costs involved in preparing a S106 agreement may mean that it is not

expedient to secure a contribution in this way. Where this is the case, the public realm contribution may take the form of appropriate on site provision, to be negotiated with the council.

### **Policy EC5: Employment and Skills Development**

This section relates to Policy EC5 (Employment and Skills Development). It explains how Crawley's Employment and Skills Programme 2019-2024 (and any subsequent updates)<sup>173</sup> will be delivered through the planning process, detailing the obligations and developer contributions that will be sought from major development in order to help improve social mobility, inclusion and address the existing skills gap.

#### Policy Context

Crawley is an economically successful borough at the heart of the Gatwick Diamond, home to around 4,000 active businesses and over 85,000 jobs. However, local residents' average earnings are below those of in-commuters, and they are less likely to access higher-skilled, higher-paid jobs. In a recent social mobility report, State of the Nation, Crawley was ranked 304<sup>th</sup> out of 324 local authorities for low social mobility.

Policy EC5 takes a pro-active approach to addressing what is an identified economic weakness for Crawley, requiring qualifying development to contribute towards addressing the skills gap and improving social mobility.

This is to be achieved through two obligations that will be required from all major development:

- i) Committing at the Planning Application stage to prepare and submit a site specific Employment and Skills Plan, the content of which must be agreed by the council, prior to the commencement of development.
- ii) The making of a proportionate financial contribution towards employment and skills initiatives in Crawley.

For all major development, developers will be required to satisfy parts i.) and ii.) of the Policy. The following guidance explains to how this can be achieved.

#### Part i) Employment and Skills Plan

At the planning application stage, the applicant will be asked to commit to preparing a site-specific Employment and Skills Plan (ESP) relating to the development. This commitment will form part of the obligations on a planning permission, secured by way of a Section 106 Agreement. The ESP should be prepared by the applicant, in liaison with the council, and must be submitted to and agreed by the council prior to the commencement of development. An advice note has been prepared by the council on the process and content of an ESP (<https://investcrawley.co.uk/employment-and-skills/employments-and-skills-programme>).

#### Requirements of Part (ii): Developer Contribution towards Employment and Skills

All major residential and employment developments will be required to make a proportionate financial contribution towards employment and skills initiatives to support those sections of the Crawley workforce who face challenges in accessing employment. The financial contributions will be used by Employ Crawley to fund workplace coordination, training and tailored support that enables individuals to better access employment opportunities, including those arising from development at either the construction or end user phase. This will normally focus on people that have been out of work for a long period of time, or that may possess a lower level of skills who might struggle to access employment or training opportunities without extra support.

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<sup>173</sup> Crawley Employment and Skills Programme 2019 – 2024

Where it can be clearly demonstrated that measures in lieu of the financial contribution would achieve greater benefits in delivering employment and skills initiatives to help Crawley residents access employment opportunities, this will in principle be supported, subject to negotiation and agreement with the council. Such measures would be expected to go beyond those identified in the Employment & Skills Plan. This may include for example on-site training provision or other interventions. Any such measures would be secured by way of a legal agreement.

The following approach will be used to calculate the financial contribution sought from development. The calculation methodology takes account of local circumstances relating to the employment market and, as appropriate, residential occupation assumptions to ensure that the financial contribution sought is locally specific and proportionate to the type and quantum of development proposed. Please note that the method set out below is the same as that shown in the Employment and Skills Provision Guidance Note.

Where major development incorporates a mix of different uses, the contribution will be calculated on the basis of the individual uses that make up that development. For example, for a mixed use office and residential development, the contribution will be calculated on the basis of both the commercial and residential elements. In all cases, the financial contribution will be secured by way of Section 106 Agreement to be paid upon the commencement of development.

Based on Department for Work & Pensions data, £6,500 is the minimum cost for training, preparing and placing into sustainable employment an unemployed person claiming Employment Support Allowance. This figure is used to inform the amount that would be required by Employ Crawley to provide the necessary training to help support a long-term unemployed individual to access employment, and feeds into the calculation for both commercial and residential developments.

#### *Residential Development, including as part of Mixed-Use Development*

For residential development, including residential components of mixed-use development, the contribution required is calculated as shown below.

#### **Employment and Skills Contribution from Residential Development**

The Employment and Skills contribution from residential development, including residential components of mixed use development, is based on the following parameters:

- a. minimum cost for supporting an individual to access employment (£6,500);
- b. number of dwellings proposed;
- c. expected adult occupancy rate for those dwellings, these being; 1 adult per studio/1 bed unit; 2 adults per 2/3/4+ bed unit;
- d. proportion of Crawley's working age population with no (or other) qualifications (7.6%)

It is calculated as:  $(a \times b \times c \times d) / 2$ , this being:

$$(\mathbf{£6,500} \times \mathbf{\text{number of dwellings proposed}} \times \mathbf{\text{expected adult occupancy}} \times \mathbf{0.076}) / 2$$

For example, for a development of 10 x 1-bedroom flats and 5 x 2-bedroom flats, the financial contribution would be calculated as:

$$(\mathbf{£6,500} \times \mathbf{10} \times \mathbf{1} \times \mathbf{0.076}) / 2 = \mathbf{£2,470} + (\mathbf{£6,500} \times \mathbf{5} \times \mathbf{2} \times \mathbf{0.076}) / 2 = \mathbf{£2,470} = \mathbf{£4,940}$$

#### *Commercial Development, including as part of Mixed-Use Development*

For commercial development, including commercial components of mixed-use schemes, development that would involve a net increase in gross internal area in excess of 1,000sqm will be subject to a proportionate financial contribution towards employment and skills.

The contribution required is based on the following parameters:

- a) Net increase in Gross Internal Area;
- b) Standard Occupancy;
- c) Crawley’s resident employment self-containment rate;
- d) Proportion of Crawley’s working age population with no (or other) qualifications;
- e) Minimum cost for supporting an individual to access employment (£6,500)

Standard Occupancy (b) should first be calculated to feed into the commercial employment and skills calculated. This will vary according to the type of commercial development that is proposed, and should be calculated on the basis on the Standard Occupancy Calculations set out below. For hotel development it will first be necessary to calculate the total number of staff based on a ‘per room’ assumption. This figure is then divided by the Gross Internal Area to feed into the next part of the formula. Sui Generis development does not have a standard occupancy, and the financial contribution required for Sui Generis development will be subject to negotiation with the council on a case-by-case basis.

### Standard Occupancy for Commercial Development

Standard Occupancy for Commercial Development is calculated on the basis below:

Offices (Class E)	1 FTE job per 11sqm
Industrial (Class B2 or E)	1 FTE job per 36sqm
Warehouse & Distribution (Class B8)	1 FTE job per 80sqm
High Street Retail (Class E)	1 FTE job per 19sqm
Food Superstore (Class E)	1 FTE job per 17sqm
Comparison Superstore/Retail Warehouse (Class E)	1 FTE job per 90sqm
Financial & Professional Services (Class E)	1 FTE job per 16sqm
Restaurant & Café (Class E)	1 FTE job per 18sqm
Hotels (Budget) (Use C1)	1 FTE job per 3 bedroom
Hotels (General – 3 Star) (Class C1)	1 FTE job per 2 bedroom
Hotels (4/5 Star) (Class C1)	1 FTE job per 1.5 bedroom
Cinemas (Sui Generis)	1 FTE job per 90sqm
Amusement and Entertainment (Class E or Sui Generis)	1 FTE job per 70sqm
Sports Centres and Private Clubs (Class E or Class F2 or Sui Generis)	1 FTE job per 65sqm

**As identified in the Northern West Sussex Economic Growth Assessment 2020, Crawley has a total working population of 55,676 people, of which 36,583 people live and work within the borough<sup>174</sup>. This figure, 65.7%, represents (c) the resident employment self-containment rate:**

**At the time of the 2021 Census, there are 85,000 jobs in the borough. Crawley has a total working population of 58,737 people, of which 44,335 live and work within the borough.**

<sup>174</sup> Source: ONS census [2021](#) [2011/Lichfields analysis](#)

Expressing the number of people who live and work within the borough as a percentage of Crawley's total jobs provides the employment self-containment rate (c). For Crawley, the employment self-containment rate is 52%.

In relation to **residential qualification levels (d)**, 92.4% of Crawley residents of working age are qualified to at least NVQ1 or above. This means that 7.6% of Crawley's working age population have no (or other) qualifications. It is these people that are most likely to face challenges in accessing sustainable employment, and who will require support in accessing the training or the employment market.

### Employment and Skills Contribution from Commercial Development

The Employment and Skills contribution from commercial development, including commercial components of mixed use development, is based on the following parameters:

- Net increase in Gross Internal Area;
- Standard Occupancy;
- Crawley's **resident** employment self-containment rate (~~65.7~~ **52**%);
- Proportion of Crawley's working age population with no (or other) qualifications (7.6%);
- Minimum cost for supporting an individual to access employment (£6,500)

The contribution required should be calculated according to the type of development, on the basis below:

#### Commercial Development (excluding Office and Hotel uses)

$(a/b) \times c \times d \times e$ , this being:

$(\text{Net increase in Gross Internal Area} / \text{Standard Occupancy}) \times \del{0.657} \mathbf{0.52} \times \mathbf{0.076} \times \mathbf{£6,500}$

For example, for a Class B2 industrial development of 1,000m<sup>2</sup> net increase in gross internal area, the financial contribution would be calculated as:

$(1,000 / 36) \times \del{0.52} \mathbf{0.657} \times \mathbf{0.076} \times \mathbf{£6,500} = \del{£7,135.55} \mathbf{£9,015.50}$

#### Office Development

The equation applied for offices is the same as that used for commercial, though for reasons of viability, the final output is halved. The equation is therefore:

$(a/b) \times \del{0.52} \mathbf{0.657} \times \mathbf{0.076} \times \mathbf{£6,500} / 2$

For example, for a Class E office development of 1,000m<sup>2</sup> net increase in gross internal area, the financial contribution would be calculated as:

$(1000 / 11) \times \del{0.52} \mathbf{0.657} \times \mathbf{0.076} \times \mathbf{£6,500} / 2 = \del{£11,676.36} \mathbf{£14,752.63}$

#### Hotel Development

For hotel development, it is first necessary to identify the anticipated number of staff, which is calculated on a ratio of staff per room, depending on the type of hotel. This is calculated on the basis of:

$(\text{Number of Rooms} / \text{Standard Occupancy}) = z$

$(a / z) \times \del{0.52} \mathbf{0.657} \times \mathbf{0.076} \times \mathbf{£6,500}$

For 150 bedroom budget hotel development of 1,000m<sup>2</sup> net increase in gross internal area, the financial contribution would be calculated as:

$(150 / 3 = 50 \text{ staff})$

$(1,000 / 50) \times \del{0.52} \mathbf{0.657} \times \mathbf{0.076} \times \mathbf{£6,500} = \del{£5,137.60} \mathbf{£6,491.16}$

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

The control or mitigation of impacts, compensation, infrastructure and benefits of growth at the Airport will be secured through appropriate planning conditions and/or S106 obligations (Policy GAT1).

### Policy H2: Key Housing Sites

A number of Key Housing Sites have been identified with specific requirements:

- **Tinsley Lane Housing and Open Space Site** (includes the replacement of Oakwood Football Club; the provision of a senior football pitch and facilities; a junior 3G football pitch; community use arrangements for the sports pitch facilities; enhancement and management for public access of Summersvere Woods; on-site publicly accessible play space and amenity greenspace; and provision of allotments).
- **Breezehurst Drive Playing Fields Housing and Open Space Site** (includes the retention of good quality pitch provision to the south of the pavilion; provision of enhanced pitch drainage off-site; new or retained provision of changing facilities; and allotments).
- **Land East of Balcombe Road/Street Hill Housing, Biodiversity and Heritage Site** (includes the long-term commitment to the ecological enhancement and proper management of the remainder of the Local Wildlife Sites for the benefit of biodiversity, and adequate mitigation and compensation measures provided to offset any harm caused to the site's important assets).

#### **Policy H5: Affordable Housing**

Policy H5 requires 40% affordable housing from all residential developments (**including both C3 and C2 use classes**) resulting in a net increase of at least one new housing unit which fall outside the Town Centre.

The council expect a minimum of 75% of the affordable housing to be Affordable Rent, or Social Rent where other forms of subsidy exist, and up to 25% as First Homes. This equates to 30% of the total scheme for Affordable/Social Rent and 10% of the total scheme as First Homes.

**On C2 developments outside the Town Centre, the value of the developer's contribution will be determined by using the Borough-Wide Commuted Sums Calculator, applying the scheme's Net Sale Area (NSA) to account for the gross-net ratio of care schemes, and that value shall determine the number of units (or bed spaces) that can be acquired on-site, with or without any additional subsidy, and of an appropriate tenure. NOTE: On-site provision will be reliant on West Sussex County Council Adult Services agreeing to support the care package, and any reasonable care-related service charges. Where Adult Services elect not to support a scheme, this will be considered an exceptional circumstance, and the Council will in this case accept an off-site commuted payment as valued at the outset.**

~~For sites of 10 dwellings or less, a commuted sum towards off site affordable housing provision will be sought, unless on site provision is preferred, with the on-site tenure mix to be agreed.~~

#### **Crawley Town Centre**

For residential developments resulting in a net increase of at least one new housing unit within the Town Centre, Policy H5 requires 25% affordable housing.

The council will expect 60% of the affordable housing in the Town Centre to be Social Rent and/or Affordable Rent, and up to 40% as Intermediate Tenure. 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.

**The Town Centre Commuted Sums Calculator will be applied in determining the value of the developer's on-site contribution on C2 developments, and/or off-site commuted payments for both C2 and C3 developments where exceptional circumstances apply. In the case of C2 developments the scheme's Net Sale Area (NSA) will be used to account for the gross-net ratio of care schemes.**

#### **Sites of 10 dwellings or less**

**For sites of 10 dwellings or less (whether C2 or C3), a commuted sum towards off-site affordable housing provision will be sought, using the Borough-Wide or the Town Centre Commuted Sum Calculator according to the location of the site, unless on-site provision is**



preferred, with the on-site tenure mix to be agreed as appropriate. For C2 schemes the relevant Commuted Sum Calculator inputs will be based on Net Sale Area only.

#### 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. Each scheme will be considered on a case-by-case basis in relation to any specific or exceptional matters. However, the starting point remains as:~~

- ~~•—Borough Wide: 40% affordable provision (tenure to be determined)~~
- ~~•—Town Centre: 25% affordable provision (tenure to be determined)~~

For traditional Care Homes, in the case of on-site provision, the requirement will be for the on-site provision ~~of the equivalent percentage in~~ to be made in the form of affordable care beds in order to meet the Policy.

#### Exceptions

Policy H5 states that, except for sites of 10 dwellings or less, payments in lieu will only be accepted in exceptional circumstances where it can be demonstrated that there are robust planning reasons for doing so and provided that the contribution is of equivalent financial value.

For high density schemes elsewhere in the borough, as defined in Policy CL4(i), and falling outside of the Town Centre, should viability evidence be provided to justify similar levels of affordable housing to that required in the Town Centre, this will be considered with claw-back mechanisms in place to secure higher levels of affordable housing provision, up to the Policy level of 40% should viability improve during the period of development construction, or in exceptional circumstances an off-site commuted payment in lieu may be considered.

The council will only consider relaxing this affordable housing requirement, in part or in full, in exceptional circumstances, where a scheme is clearly subject to abnormal costs, not including land costs, and not otherwise envisaged by the Local Plan Viability Assessment, and where this is evidenced by robustly assessed viability. The scheme must also evidence that it addresses a demonstrative and immediate housing need. In such situations, the scheme is expected to appraise various permutations of affordable housing provisions to best address local affordable housing needs, and where concessions are agreed by the council then claw-back mechanisms will be expected to be put in place and the scheme independently assessed.

Build to Rent will also be considered as an exception while it remains all for rent, and is further detailed in Policy H6, which will revert back to Policy H5 should such schemes cease to be predominantly private rental.

Rent to Buy is considered as an exceptional Intermediate Tenure that may be considered only in exceptional circumstances where it can be evidenced to address local housing needs, and will not be considered as a rental tenure.

#### Mechanism to Secure the Delivery of Affordable Housing

Section 106 Planning Agreements (or Unilateral Undertakings) will be required to secure the delivery of affordable housing. The council will expect affordable housing to receive free serviced land as a starting point, whereby the Registered Provider receives transfer of the built-out units at a price commensurate with the affordable tenure or under special circumstances receives free transfer of serviced land at an equivalent aggregate value. The S106 Agreement will require applicants to provide an Affordable Housing Scheme setting out the provisions of affordable housing in keeping with this Policy requirement (para. 13.32).

Where exceptional circumstances result in the council accepting an off-site commuted payment, the basic rationale will be for the council to secure a capital contribution that would be at a minimum equivalent to free-serviced land, and should reflect the cost to the

development had affordable housing been provided on-site. The approach to be taken in calculating the financial contribution is based on a Square Metre Levy.

This is an approach whereby a square metre levy is applied across the whole development ([or the Net Sale Area in the case of C2 developments](#)) aimed at securing an appropriate proportion of the build area towards the provision of affordable housing on an alternative site. This approach seeks to achieve a value equivalent to free-serviced land for the proportion of affordable housing that would otherwise have been provided on-site. For Crawley, a land-value tariff of £350 p/sqm ([£218.75 p/sqm in the Town Centre](#)) is considered appropriate.

**Square Metre Levy:**

[Boroughwide](#)

$$GIA \times [\pounds350] \text{ p/m}^2 = \text{Commuted sum}$$

[Town Centre](#)

$$GIA \times [\pounds218.75] \text{ p/m}^2 = \text{Commuted sum}$$

**Note:** The key variables of [£350 or £219](#) per square meter and [30%](#) of gross development value applies in full from [11] units upwards.

To address any 'disproportional burden', these variables on smaller schemes of [10 units or less] are 'discounted' on a sliding scale, the first unit starting at [one-third] of these respective values.

[Affordable Housing Calculator](#)

<b>Key Variables:</b>				Value Equal to % AH
Free land to m2:		£350		
Free land to OMV:		30%		
Policy Requirement:		40%		
Units	% of OMV	Units	m2 tariff	% AH
1	10.0%	1	£116.67	13%
2	12.0%	2	£140	16%
3	14.0%	3	£163	19%
4	16.0%	4	£187	21%
5	18.0%	5	£210	24%
6	20.0%	6	£233	27%
7	22.0%	7	£257	29%
8	24.0%	8	£280	32%
9	26.0%	9	£303	35%
10	28.0%	10	£327	37%
11	30.0%	11	£350	40%
12	30.0%	12	£350	40%
13	30.0%	13	£350	40%
14	30.0%	14	£350	40%
15	30.0%	15	£350	40%

**Key Variables – Model Assumptions:**

1. Free Land to m2: £350 notional value of free serviced land for the 40% affordable housing quota.
2. Free Land to OMV: 30% of market value of the 40% affordable housing quota, equating to a notional value of free serviced land, for 11+ units, with a sliding discount applied from 1-10 units.

**Indicative Scheme for modelling purposes only:**

Unit type	units	m2	circulation	Total m2
Studio Flat	0	37	20%	0
1b/2p Flat	2	50	20%	120
2b/3p Flat	0	62	20%	0
2b/4p Flat	2	70	20%	168
2b/4p House	2	79	20%	158
3b/5p House	0	95	0%	0
4b/6p House	0	106	0%	0
	<b>6</b>			<b>446</b>

**Affordable Housing [on-site/off-site] Calculator**

Total number of residential units:  units  
Total Gross Internal Area (GIA):  m<sup>2</sup>  
Number of affordable units applicable: 2.4 AH units  
**Committed Payment Due:**  
**Square meter levy**  £233 p/m<sup>2</sup>

## Boroughwide Affordable Housing Calculator

<b>Key Variables:</b>		
Free land to m2:	<input type="text" value="£350"/>	Value Equal to % AH
Free land to OMV:	<input type="text"/>	
Policy Requirement:	<input type="text" value="40%"/>	

Units	m2 tariff	% AH	AH units	avg. GIA	Sum due	Avg pu
1	£116.67	13%	0.13	60	£7,000	£52,501
2	£140	16%	0.32	120	£16,800	£52,501
3	£163	19%	0.56	180	£29,400	£52,501
4	£187	21%	0.85	240	£44,800	£52,501
5	£210	24%	1.20	300	£63,000	£52,501
6	£233	27%	1.60	360	£84,000	£52,501
7	£257	29%	2.05	420	£107,800	£52,501
8	£280	32%	2.56	480	£134,400	£52,501
9	£303	35%	3.12	540	£163,800	£52,501
10	£327	37%	3.73	600	£196,000	£52,501
11	<b>£350</b>	<b>40%</b>	4.40	<b>660</b>	£231,000	£52,500
12	£350	40%	4.80	720	£252,000	£52,500
13	£350	40%	5.20	780	£273,000	£52,500
14	£350	40%	5.60	840	£294,000	£52,500
15	£350	40%	6.00	900	£315,000	£52,500

### Key Variables – Model Assumptions:

- Free Land to m2: £350 notional value of free serviced land for the 40% affordable housing quota.
- Free Land to OMV: 30% of market value of the 40% affordable housing quota, equating to a notional value of free serviced land, for 11+ units, with a sliding discount applied from 1-10 units.

## Indicative scheme for modelling purposes only

### BOROUGH-WIDE Affordable Housing Calculator (40% policy)

Total number of self-contained residential units:	<input type="text" value="6"/>	units
GIA for C3 Residential & NSA for C2 Residential	<input type="text" value="446"/>	m2
Number of affordable units applicable:	2.4	AH units
<b>Commuted Payment Due:</b>	<b>£104,067</b>	@ £23 /m2

## Town Centre Affordable Housing Calculator

Units	m2 tariff	% AH	AH units	avg.GIA	Sum due	Avg pu
1	£73	8%	0.08	60	£4,375	£52,521
2	£87	10%	0.20	120	£10,500	£52,516
3	£102	12%	0.35	180	£18,375	£52,512
4	£117	13%	0.53	240	£28,000	£52,509
5	£131	15%	0.75	300	£39,375	£52,507
6	£146	17%	1.00	360	£52,500	£52,505
7	£160	18%	1.28	420	£67,375	£52,504
8	£175	20%	1.60	480	£84,000	£52,503
9	£190	22%	1.95	540	£102,375	£52,502
10	£204	23%	2.33	600	£122,500	£52,501
<b>11</b>	<b>£219</b>	<b>25%</b>	<b>2.75</b>	<b>660</b>	<b>£144,375</b>	<b>£52,500</b>
12	£219	25%	3.00	720	£157,500	£52,500
13	£219	25%	3.25	780	£170,625	£52,500
14	£219	25%	3.50	840	£183,750	£52,500
15	£219	25%	3.75	900	£196,875	£52,500

### Key Variables – Model Assumptions:

**1. Free Land to m2: £218.75 notional value of free serviced land for the 25% affordable housing quota.**

**2. Free Land to OMV: 30% of market value of the 25% affordable housing quota, equating to a notional value of free serviced land, for 11+ units, with a sliding discount applied from 1-10 units.**

### Indicative scheme for modelling purposes only

TOWN CENTRE Affordable Housing Calculator (25% policy)	
Total number of self-contained residential units:	10 units
GIA for C3 Residential & NSA for C2 Residential	1,000 m <sup>2</sup>
Number of affordable units applicable:	2.5 AH units
<b>Commuted Payment Due:</b>	<b>£204,167 @ £204 p/m<sup>2</sup></b>

Normally, for schemes of one to ten dwellings payments shall be made on occupation of the first property. For schemes of 11 dwellings or more, the payment schedule will be 50% on commencement and 50% upon occupation of the first market units, unless otherwise agreed. Indexation will continue until the final payment is made.

The council may spend the capital contribution in any part of the borough, or within developments beyond Crawley's administrative boundary where the council secures nomination rights to affordable housing, for the provision of and/or improvements to affordable housing.

### Approach for Small Sites:

Where financial contributions are sought (including for calculating the value for on-site tenure options in developments of six to ten new dwellings), the Affordable Housing Calculator has a built-in sliding scale discount, to ensure the contribution required remains proportionate and viable for smaller developments. For smaller schemes (ten dwellings or less) payment is accepted at the point of first occupation in order to aid cash-flow constraints.

On smaller schemes of 10 units or less the starting point will be to establish the capital value of the expected affordable housing contribution using the Affordable Housing Calculator. This will determine the commuted sum payable on schemes of 5 residential units or less, unless the applicant wishes to consider on-site provision whereby the approach detailed below will also apply.

For schemes in the range of 6 to 10 residential units, the capital contribution established by the Affordable Housing Calculator for on-site provision will be modelled by the council to determine the most appropriate on-site use of this resource to address local housing needs while taking into account practical considerations and constraints.

The council's options would then be to apply this capital value across the available affordable housing units as either Discounted Market Sale or Shared-Equity, which would not require the involvement of a Registered Affordable Housing Provider. Alternatively, with the involvement of a Registered Affordable Housing Provider, the options available to the council would then include either Shared-Ownership or Affordable Rent. The council may choose to apply this capital value over fewer affordable units than are due in order to improve the affordability of the affordable units.

### **Worked Examples**

**For example:**

**C3 Scheme:** A scheme comprising of 6 residential units (2 x 1b/2p flats, 2 x 2b/4p flats, and 2 x 2b/4p houses) **outside the Town Centre** would have:

- an affordable housing requirement of 2.4 affordable units;
- which would be equivalent to a capital contribution towards affordable housing ranging between £104,067 and £119,953.
- This is based on 446m<sup>2</sup> GIA and almost £1.5m GDV, depending on which option is applied.

**C2 Scheme: A scheme with a Gross Internal Area (GIA) of 10,000 square metres, outside the Town Centre, comprising 100 self-contained dwellings, and with a Net Sale Area (NSA) of 6,500 square metres, would result in an affordable housing requirement of £2,275,000.00 (£350 x 6500).**

**Subject to West Sussex County Council providing a care package, this could be used to secure affordable housing within the scheme as follows:**

**Average market value of scheme dwellings: £340,000**

**Average cost per dwelling of securing 55% equity: £187,000**

**Number of dwellings secured by affordable housing requirement =  $2275000 / 187000 = 12.166$ . This could be increased to 13 with an additional £156,000 in grant funding.**

In addition, to further reduce disproportionate burdens on smaller developments, the council will seek to simplify viability assessment requirements. If a viability or delivery problem is accepted, then the council will consider:

- i. Varying mix/tenure split;
- ii. Varying payment timing;
- iii. Reducing percentage of affordable and/or applying a lower sum to the off-site calculation.

### **Policy H6: Build to Rent**

Build to rent schemes are regarded as an exception to Policy H5, whereby Policy H5 will be deferred for as long as the scheme remains all-rental, during which time Affordable Private Rent is expected on the following basis:

- i. Schemes shall incorporate an element of Affordable Private Rent comprising:
  - 20% of dwellings in schemes within the town centre, or
  - 30% of dwellings in schemes elsewhere in the borough.In both settings rentals will not exceed either 80% of market rent values or Local Housing Allowance rates, and shall be offered to the council for qualifying nominations on an Assured Shorthold Tenure (AST) basis. Under no circumstances will less than 20% affordable private rent be provided in line with NPPF guidance.
- ii. A deferred Affordable Housing Scheme is to be identified, for future provision in the event that the scheme ceases to be all-rental, in accordance with the requirements of Policy H5 (as applicable to the location of the development).

The deferred Affordable Housing Scheme will be triggered and delivered in the event that the scheme ceases to be all-rental, and shall be disposed of to a Registered Provider at their best consideration (Policy H6).

To accommodate this particular investment model, and where ongoing management is to be provided in a fully rented scheme, the council will not require a Registered Provider to take on the affordable units, and council is prepared to defer the intermediate tenure requirement of the policy for as long as the scheme remains all-rental (para. 13.43).

In such circumstances, the council will require the rentals to be made available at affordable rent levels, not exceeding 80% of the equivalent open market values and not exceeding Local Housing Allowance rates, and the council will enter into a Lettings Agreement to allow for nominations to be made into the affordable private rented units (para. 13.44).

The scheme will be expected to enter into a S106 Agreement that will remain with the land, and in the event that the scheme ceases to be all-rental the S106 Agreement will require the affordable units, including the deferred intermediate tenure properties, to be made available to Registered Providers in line with the council's affordable housing policy, which shall include any claw-back provisions in the event that the council allows any concessions to the affordable housing policy requirements (para. 13.45).

A planning obligation will be sought for the following purposes detailed in Policy H6 in respect of the rental scheme:

- Securing the status of the units as Build to Rent for at least 15 years;
- Securing the unified ownership and unified management across the Build to Rent scheme, embracing both Market Rent and Affordable Private Rent units;
- Affordable housing requirements (including review mechanisms where appropriate) and regular provision of evidence of compliance by the scheme operator;
- Securing council nomination rights in respect of the affordable units through an agreed Deed of Nomination;
- Clawback mechanisms to secure compensation in the event of the loss of Market Rent homes before the expiry of the covenant period;
- Site management arrangements.

### **Policy GI1: Green Infrastructure**

Policy GI1 states that proposals which reduce, block or harm the functions of green infrastructure should be avoided. Any loss will be required to be adequately justified,

minimised, and mitigated against or as a last resort compensated for to ensure the integrity of the green infrastructure network is maintained.

Proposals should maximise the opportunity to maintain and extend green infrastructure links to form a multi-functional network of open space, providing opportunities for walking and cycling, and connecting to the urban/rural fringe and the wider countryside beyond.

Large proposals will be required to provide new and/or create links to green infrastructure where possible.

### **Policy GI3: Biodiversity and Net Gain**

All development proposals will be expected to incorporate features to encourage biodiversity and enhance existing features of nature conservation value within and around the development. Development will be required to demonstrate how it will meet the government's requirement for securing a 'net gain' in biodiversity. As a minimum, all development proposals will be need to achieve a net gain for biodiversity in accordance with government expectations<sup>175</sup>: a 10% increase in habitat value for wildlife compared with the pre-development baseline (Policy GI3).

In the first instance, net gain for biodiversity will be expected to achieve a minimum 10% increase on site. Only where it is clearly justified this is not practicable to achieve, and where it is shown to have been considered and sought from the early stages of the design and layout of the development, will off-site provision, in the form of equivalent financial contributions, be agreed.

Defra and Natural England have worked together to prepare and publish a Biodiversity metric: <http://publications.naturalengland.org.uk/publication/6049804846366720>

The Natural England link above provides more information on the Biodiversity Metric as well as the tools and user guides required to understand the metric. It also includes the project specific calculation tool.

### **Policy SDC2: District Energy Networks**

Where a connection to an existing District Energy Network is proposed, the council may secure the implementation of this by means of a planning obligation.

### **Policy SDC4: Water Neutrality**

Policy SDC4 sets out how development within the Sussex North Water Resource Zone (WRZ) will be expected to achieve water neutrality, in order to comply with the Habitats Regulations.

Developments will be required to achieve identified levels of water efficiency through water efficient design, and remaining mains-supplied water use will be required to be offset such that there is no net increase in mains-supplied water use within the WRZ compared with pre-development levels.

A local planning authority-led water offsetting scheme will be introduced within the WRZ as one way to bring forward development that is supported by local plans. Development proposals are not required to utilise this scheme and may achieve water neutrality through bringing forward their own offsetting schemes.

Where developments propose to use a water offsetting scheme or an alternative water supply in order to meet the requirement for water neutrality set out in Policy SDC4, planning obligations will be imposed as needed in accordance with the tests set out in CIL Regulation 122.

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<sup>175</sup> Government's Environment Act (2021)



Where a development is accessing the Local Authority Offsetting Implementation Scheme (OIS), a proportionate financial contribution will be secured to cover the costs of the offsetting measures required as well as the operating overheads of the OIS. Assuming that residential development meets the required water efficiency standard of 85 litres per person per day in accordance with the policy, a large proportion of the net water demand from planned development in the Sussex North Water Resource Zone during the Plan period (projected at 87.7 per cent in the Water Neutrality Part C Report) will be offset by measures to be undertaken by Southern Water as part of their Water Resource Management Plan (WRMP) later in the Local Plan period. This will mean that developments only need to pay for the cost of offsetting their residual demand (i.e. projected at 12.3 per cent).

These costs and the associated terms and conditions for accessing the OIS will be subject to confirmation as the OIS is established, and these are likely to vary over the Local Plan period as offsetting measures and associated costs are reviewed. The Water Neutrality Part C Strategy projects that offsetting measures alone (i.e. excluding the operating overheads of the OIS) could cost £3.30 per litre per day in 2022 values. An indicative cost per-dwelling in residential development can be derived from this using further assumptions derived from the report and the council's own residential occupancy assumptions, i.e.:

- a) that the development achieves a water efficiency level of 85 litres/person/day in accordance with the policy;
- b) applying the standard occupancy of persons per dwelling<sup>176</sup>;
- c) that 87.7 per cent of water demand is offset by the Southern Water WRMP.

On this basis, an indicative cost of offsetting measures per-dwelling can be calculated. The worked example below assumes for two-bed dwelling (2.5 occupants) as follows:

$£3.30 \times 85 \text{ (litres/person/day)} \times 2.5 \text{ (occupants)} \times 0.123 \text{ (proportion of water demand remaining to be offset after Southern Water Measures)} = £86.25$

The cost of the operating overheads of the OIS remain to be confirmed, but are likely to be at least as much again.

In response to these costs, and to the further costs of achieving water efficient design in accordance with the Policy, the Viability Assessment Addendum for the Local Plan makes an allowance of £2,000 per dwelling for the total cost of achieving water neutrality through water efficient design and offsetting. While the clear majority of this allowance is likely to be required for water efficient design measures, this figure is considered to be sufficient to meet the additional costs arising from offsetting measures secured via a S106 agreement (including overheads of the OIS, where relevant).

### **Policy EP5: Air Quality**

Development that may reasonably be considered to impact upon air quality, will be expected to contribute towards achieving a reduction in levels of air pollution, and should demonstrate how this will be achieved through an Air Quality Assessment (Policy EP5).

#### Emissions Mitigation Calculation

The purpose of an emissions mitigation assessment is to:

- 1) calculate the additional transport emissions associated with a development;
- 2) determine the appropriate level of mitigation required to help avoid, minimise and/or off-set the impact on air quality.

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<sup>176</sup> Where the dwelling size mix of the development is known, assumed occupancy will be calculated on the basis of the 'Standard Occupancy Calculations' relating to different dwelling sizes which are set out earlier in this Annex. Where the dwelling mix is not known the average figure of 2.5 persons per dwelling will be used.

The calculation methodology is provided in the latest version of the [Air Quality and Emissions Mitigation Guidance for Sussex](#). In summary, the calculation is a two stage process:

**Step 1** uses the DEFRA Emissions Factor Toolkit (EFT) to estimate the transport emissions of NO<sub>x</sub> and PM<sub>2.5</sub> from a proposed development (over a 5 year period)

<http://laqm.defra.gov.uk/review-and-assessment/tools/emissions.html>

**Step 2** uses the output data from the EFT to estimate the associated health damage cost from each of these pollutants (over a 5 year period) using the Defra Damage Cost Appraisal Toolkit (DCAT)

<https://www.gov.uk/guidance/air-quality-economic-analysis#damage-costs-approach>

The sum of the health damage cost from both pollutants (NO<sub>x</sub> and PM<sub>2.5</sub>) provides the total emissions mitigation value to be applied to practical mitigation measures.

### **Policy ST1: Development and Requirements for Sustainable Transport**

For development which generates a significant demand for travel, and/or is likely to have other transport implications contributions to improved sustainable transport infrastructure off-site will be required. This may include, where appropriate, bus priority measures, enhanced passenger information, and routes identified in the council's Local Cycling and Walking Infrastructure Plan (Policy ST1).

A contribution will be sought from major residential and commercial developments including new buildings outside of the Gatwick Airport Boundary as follows:

**Contribution = notional unit cost of infrastructure x proportion of infrastructure catchment arising from the development x notional distance covered by scheme (rounded to the nearest £1)**

Where:

**Notional unit cost of infrastructure** = £375,000 (the cost per km of providing a notional cycling/walking route)

**Proportion of infrastructure catchment arising from the development** = a fraction calculated in the following way:

- In Manor Royal:  $O / (O + 13,931^*)$
- Outside Manor Royal:  $O / (O + 4,000^\dagger)$

Where O = the net additional occupancy generated by the development, based on the development type, and calculated in accordance with the Standard Occupancy Calculations set out above.

**Distance** = the higher figure of either 0.5 km or the distance (to the nearest 0.1km) by foot or bicycle between the development site and the nearest of either a railway station OR a stop on the high frequency, quality bus corridor identified in Policy CL4.

**No contribution will be sought where the amount calculated using this method falls below £500 for the entire development.**

\*13,931 is a notional catchment figure for sustainable transport infrastructure projects in Manor Royal, representing half of the working population of the Business District.

†4,000 is a notional catchment figure for sustainable transport infrastructure projects in Crawley's neighbourhoods, representing roughly half of the average population of a Crawley neighbourhood.

**Worked Example 1:**

50-dwelling town centre residential scheme comprising 15 1-bed dwellings, 23 2-bed dwellings, 10 3-bed dwellings and 2 4-bed dwellings, located within 0.5km of a railway station/high frequency bus corridor.

Occupancy is as follows:

$$15 \text{ 1-bed dwellings} = 15 \times 1.5 = 22.5$$

$$23 \text{ 2-bed dwellings} = 23 \times 2.5 = 57.5$$

$$10 \text{ 3-bed dwellings} = 10 \times 2.5 = 25$$

$$2 \text{ 4-bed dwellings} = 2 \times 2.8 = 5.6$$

$$\text{Total} = \mathbf{111} \text{ (rounded up from 110.6)}$$

Thus the proportion of infrastructure catchment arising from the development is calculated as follows:

$$111 / (111 + 4000) = 111 / 4111 = 0.02700073$$

The contribution should therefore be calculated as follows:

$$£375,000 \times 0.02700073 \times 0.5 = \mathbf{£5,063} \text{ (to the nearest £)}$$

**Worked Example 2:**

2000sqm office building in Manor Royal within 1km of a railway station/high frequency bus corridor.

Occupancy is as follows:

$$2000\text{sqm office} = 182 \text{ FTE workers at 1 worker per 11 sqm (rounded up from 181.8182).}$$

Thus the proportion of infrastructure catchment arising from the development is calculated as follows:

$$182 / (182 + 13931) = 182 / 14113 = 0.01289591$$

The contribution should therefore be calculated as follows:

$$£375,000 \times 0.01289591 \times 1 = \mathbf{£4,836} \text{ (to the nearest £)}$$

**Worked Example 3:**

1000sqm storage and distribution building in Manor Royal within 0.5km of a railway station/high frequency bus corridor.

Occupancy is as follows:

$$1000\text{sqm storage and distribution} = \mathbf{13} \text{ FTE workers at 1 worker per 80sqm (rounded up from 12.5).}$$

Thus the proportion of infrastructure catchment arising from the development is calculated as follows:

$$13 / (13 + 13931) = 13 / 13944 = 0.0009323$$

The contribution should therefore be calculated as follows:

$$£375,000 \times 0.0009323 \times 0.5 = \mathbf{£175} \text{ (to the nearest £) – therefore no contribution as amount is less than £500.}$$

Further planning obligations may be used to secure:

- sustainable transport measures or mitigation identified as part of an agreed Travel Plan or Mobility Strategy;
- mitigation of residual impacts on the highways network.

## Crawley Local Plan Parking Standards Annex

The standards set out below are indicative minimum standards, setting out the level of provision which the council will generally expect in new developments.

Where a lower level of provision is proposed, the council will expect this to be justified on site-specific grounds, including (where appropriate) evidence concerning the accessibility of the location.

Evidence should be provided to demonstrate where overflow parking demands can be accommodated (on-street or elsewhere), that there is sufficient capacity for these demands to be met and that mitigation can be provided where necessary to ensure that overflow parking would not create a highway safety issue. This could include, where appropriate, measures included in a Travel Plan or Mobility Strategy, the funding of additional waiting restrictions, or restrictions on the ability of occupants of new development to qualify for residents and visitors parking permits.

The associated car parking zone maps can be found at the end of this Annex. These maps are not to scale. For a scaled version please download the electronic copy found on the council website.

### Residential Uses

Parking standards for residential development are based on likely demand in terms of car ownership, taking into account the accessibility of the area by modes of transport other than the car. Other factors that will be taken into account include age, household types and the type of housing.

### Dwellings

The standards and associated parking behaviour zones in respect of dwellings are consistent with the West Sussex County Council Guidance on Parking at New Developments (2019). The zones are based on (pre-2019) ward boundaries, and accordingly the standards should be applied flexibly where there are significant variations in parking demand within a zone, for example, where there are clear variations in density between neighbouring areas of housing, or in those zones which include parts of the Town Centre, where significantly lower levels of demand and parking will be expected. (Please note figures for Parking Behaviour Zone 1 which mainly applies to rural areas have not been included as no areas within Crawley are identified as falling within that zone.)

Residential Parking Demand (spaces per dwelling)					
Number of bedrooms	Number of habitable rooms	Parking Behaviour Zones			
		2	3	4	5
1	1 to 3	1.4	0.9	0.9	0.6
2	4	1.7	1.3	1.1	1.1
3	5 to 6	2.1	1.8	1.7	1.6
4+	7 or more	2.7	2.5	2.2	2.2

#### Notes:

*The standards are per dwelling, and do not distinguish between flats and houses.*

*The boundaries of the zones are shown on zone plans. These boundaries are indicative only, and consideration will be given to applying similar standards in close proximity to the boundaries.*

*In the case of an application to extend a dwelling, additional parking may be required in accordance with these standards.*

Where it is proposed that parking spaces will be allocated to individual dwellings, the parking provision should include allowance for visitor parking and/or flexible, unallocated spaces as appropriate to the circumstances of the site, so as to ensure efficient use of space.

Habitable rooms include all rooms used for cooking, eating, sleeping and living.

#### Other residential uses

Description	Use Class	Standard
Sheltered accommodation and flats for the elderly *		1 space per 2 units, plus staff space
Care and residential nursing homes	C2	1 space per 20 residents and; 1 visitor space per 8 residents and; 1 staff space per 5 residents
Houses in multiple occupation		0.5 spaces per unit
Hostels		1 space per 4 residents 1 visitor space for every 20 residents

\* Sheltered accommodation is where development is provided with internal communal facilities and warden accommodation. In other cases, the residential standard will apply.

#### Offices Use Class E(g)(i)

In order to reflect different levels of accessibility within the town, a zonal approach to applying parking standards for office development is adopted. The three zones are:

1. the Town Centre;
2. around Three Bridges Station; and
3. Manor Royal.

The boundaries of the three zones are set out on the attached maps.

Zone 1 – Town Centre	Zone 2 – Three Bridges	Zone 3 – Manor Royal	Other locations
1 space per 41m <sup>2</sup>	1 space per 35m <sup>2</sup>	1 space per 31m <sup>2</sup>	1 space 30m <sup>2</sup>

Notes:

These standards are indicative and are intended to reflect likely demand. Provision below these standards may be acceptable if it can be demonstrated how the total access needs of the development can be met.

The suggested boundaries of the zones are shown on zone plans. These boundaries are indicative only, and consideration will be given to similar standards in close proximity to the boundaries.

#### Other Industrial and Retail Uses

	Use Class	Car Parking	Lorry Parking
Food retail *	E(a) / F2(a)	1 space per 14m <sup>2</sup>	
Non-food retail *	E(a) / F2(a)	1 space per 20m <sup>2</sup>	
Financial and Professional services	E(c)(i-iii)	1 space per 30m <sup>2</sup>	
Restaurants, cafes	E(b)	1 space per 5m <sup>2</sup> public area and 2 spaces per bar for staff	
Research and development/ Light Industry	E(g)(ii-iii)	Assessed individually. A lower level of parking than in equivalent office uses will typically be expected.	
Industrial	B2	1 space per 40m <sup>2</sup>	1 space per 500m <sup>2</sup> . 1 space minimum

Warehousing	B8	1 space per 100m <sup>2</sup>	1 space per 500m <sup>2</sup> . 1 space minimum
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\* For extensions and small shop units under 100m<sup>2</sup> – no spaces will be sought.

### Other Uses

Any uses not listed in the following table will be considered on their own merits.

		<b>Car Parking</b>	<b>Lorry Parking</b>
Car sales		1 space per 30m <sup>2</sup> of internal and external gross display area. Staff spaces to be clearly designated.	On merits but to include space for off-loading car transporters
Motor repair garages		1 space per 45m <sup>2</sup> for staff and 3 spaces per service bay (or 25m <sup>2</sup> ).	Assessed individually
Places of assembly/leisure	E or F2 or Sui Generis	1 space per 22m <sup>2</sup>	
Large scale places of assembly serving more than a local catchment		1 space per 15m <sup>2</sup>	
Cinemas and conference facilities		1 space per 5 seats	
Stadia		1 space per 15 seats	
Vets and medical centres		1 space per practitioner plus 4 spaces per consulting room plus 1 space per 20m <sup>2</sup> of office space	
Hotels and guesthouses	C1	1 space per bedroom	
Schools		Assessed individually within the context of a travel plan using 1 space per 2 staff as a guide	
Higher and further education		1 space per 2 staff 1 space per 15 students	
Children's Nurseries		Assessed individually using 1 space per 2 staff as a guide with provision for dropping off	
Playing fields		12 spaces per hectare	
Hospitals		Assessed individually based on a travel plan	
Garden centres		1 space per 20m <sup>2</sup> for covered sales 1 space per 30m <sup>2</sup> for uncovered sales	Under 1,000m <sup>2</sup> – 2 spaces Over 1,000m <sup>2</sup> – 3 spaces
Wholesale cash and carry		1 space per 50m <sup>2</sup>	1 space per 200m <sup>2</sup>
Open storage		1 space per 100m <sup>2</sup>	Assessed individually

		<b>Car Parking</b>	<b>Lorry Parking</b>
Tennis, badminton and squash courts		2 spaces per court	
Swimming pools		1 space per 10m <sup>2</sup> of pool area	
Golf courses		4 spaces per hole	
Riding schools/ stables		2 spaces per loose box	
Indoor equestrian centres		1 space per 20m <sup>2</sup> of arena	1 space per 150m <sup>2</sup> of arena

### Disabled Parking

The Department for Transport has published guidance entitled “Inclusive Mobility”: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (December 2002). This document includes technical advice on a range of mobility/access related issues, including recommended standards for parking provision. Additional guidance is provided in the government publication ‘Manual for Streets’

<https://www.gov.uk/government/publications/manual-for-streets>.

For employment uses - a minimum of one space or 5% of total parking provision.

For car parks associated with shopping areas, leisure, recreation and places open to the general public - a minimum of one space per disabled employee plus 6 percent of total capacity.

### Electric Vehicle Charging Infrastructure

**Provision of EV charging infrastructure as part of new vehicular parking should be made in accordance with Building Regulations, with EV charge points being designed and located in a manner appropriate to the requirements of the development.**

**Until the introduction of national requirements for EV charging infrastructure in new developments, through Building Regulations or otherwise, provision should be made as follows:**

- ‘Active’ charging points for electric vehicles should be provided on a set proportion of car parking spaces, in accordance with the following table. This is based on West Sussex County Council Guidance on Parking at New Developments (2019), and is informed by the government’s intention that 50% - 70% of new car sales should be ultra low-emission by 2030;**
- Ducting provided at all remaining spaces where appropriate to provide ‘passive’ provision for these spaces to be upgraded in future.**

<b>Year</b>	<b>Proportion of ‘active’ charging points</b>
2020	28%
2021	33%
2022	37%
2023	41%
2024	45%
2025	49%
2026	53%
2027	58%
2028	62%
2029	66%
2030	70%



## Car Parking Space Sizes

The dimensions of parking spaces should follow guidance set out in 'Manual for Streets' (see link above). Perpendicular car parking spaces should have a minimum width of 2.4m and a minimum length of 4.8m.

## Cycle Parking

All cycle parking must be sheltered and secure and in accordance with local guidance and best practice design. However, flexibility and innovation will be encouraged. It is essential that cycle parking is considered carefully within the design of new development.

## Non Residential Uses

Use class		Staff	Visitors
Retail uses	E(a) / F2(a)	1 space per 100m <sup>2</sup>	1 space per 100m <sup>2</sup>
Financial services	E(c)(i-iii)	1 space per 100m <sup>2</sup>	1 space per 200m <sup>2</sup>
Restaurants/Takeaways	E(b)	1 space per 4 staff	1 space per 25m <sup>2</sup>
Offices	E(g)(i)	1 space per 150m <sup>2</sup>	1 space per 500m <sup>2</sup>
Industrial	B2	1 space per 200m <sup>2</sup>	1 space per 500m <sup>2</sup>
Warehousing	B8	1 space per 500m <sup>2</sup>	1 space per 1000m <sup>2</sup>
Places of assembly and leisure	E or F2 or Sui Generis	1 space per 4 staff	Assessed individually

## Residential Uses

No additional cycle parking spaces will be required where a garage is provided.

One bed dwellings -

One space per dwelling and 1 space per 8 dwellings for visitors

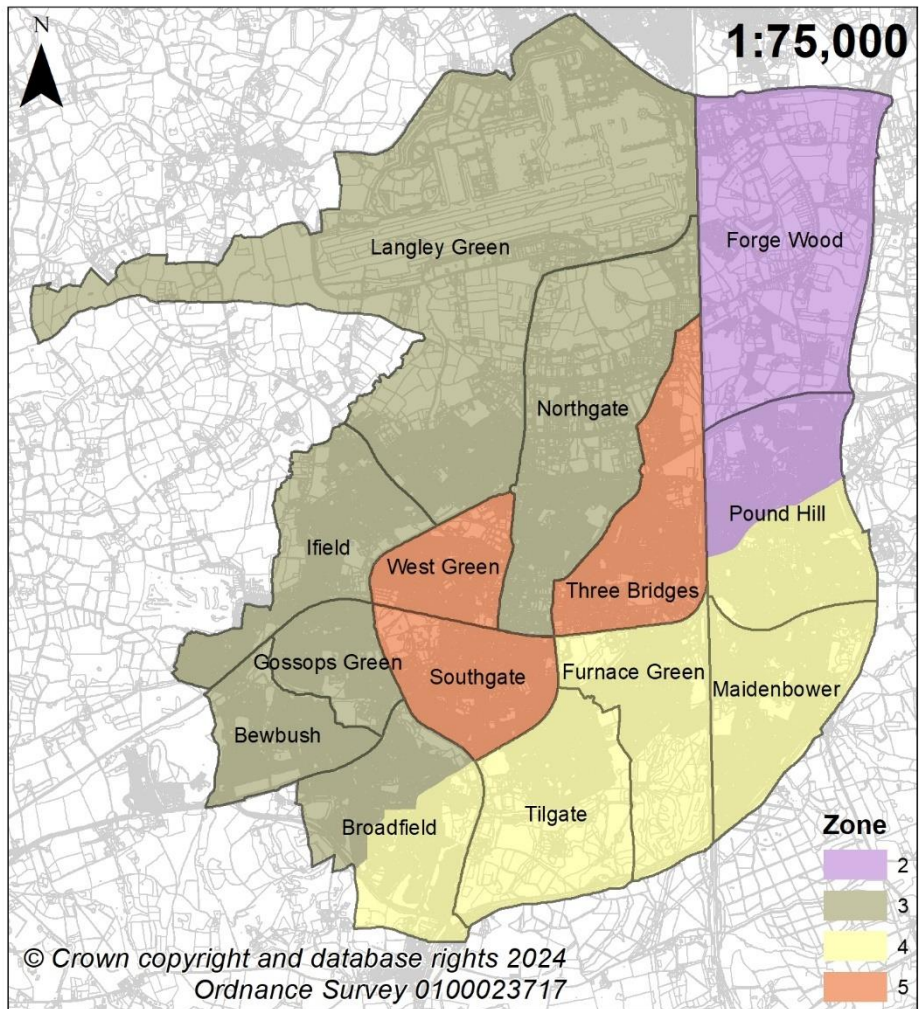
Two bed dwellings or more -

2 spaces per dwelling and 1 space per 8 dwellings for visitors

## Motorcycle Parking

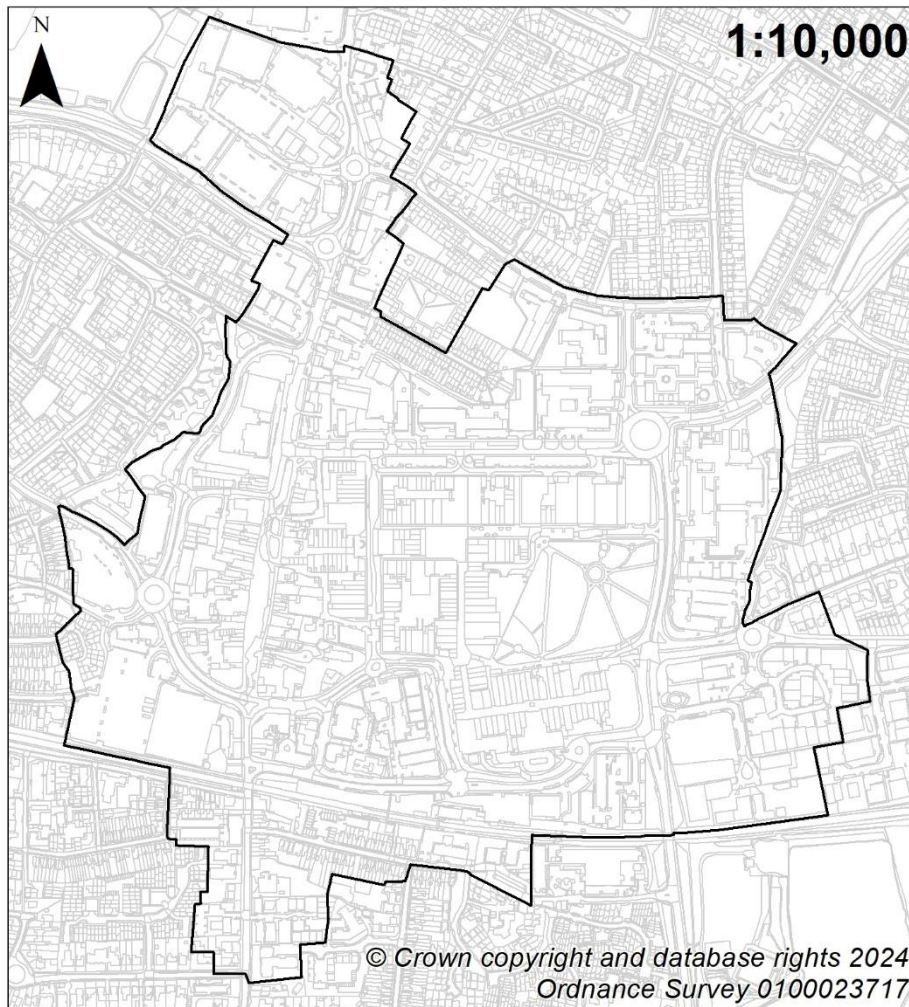
1 space plus one space per 10 car parking spaces.

For retail uses involving bulky purchases the provision may be reduced to 1 space per 25 car parking spaces.



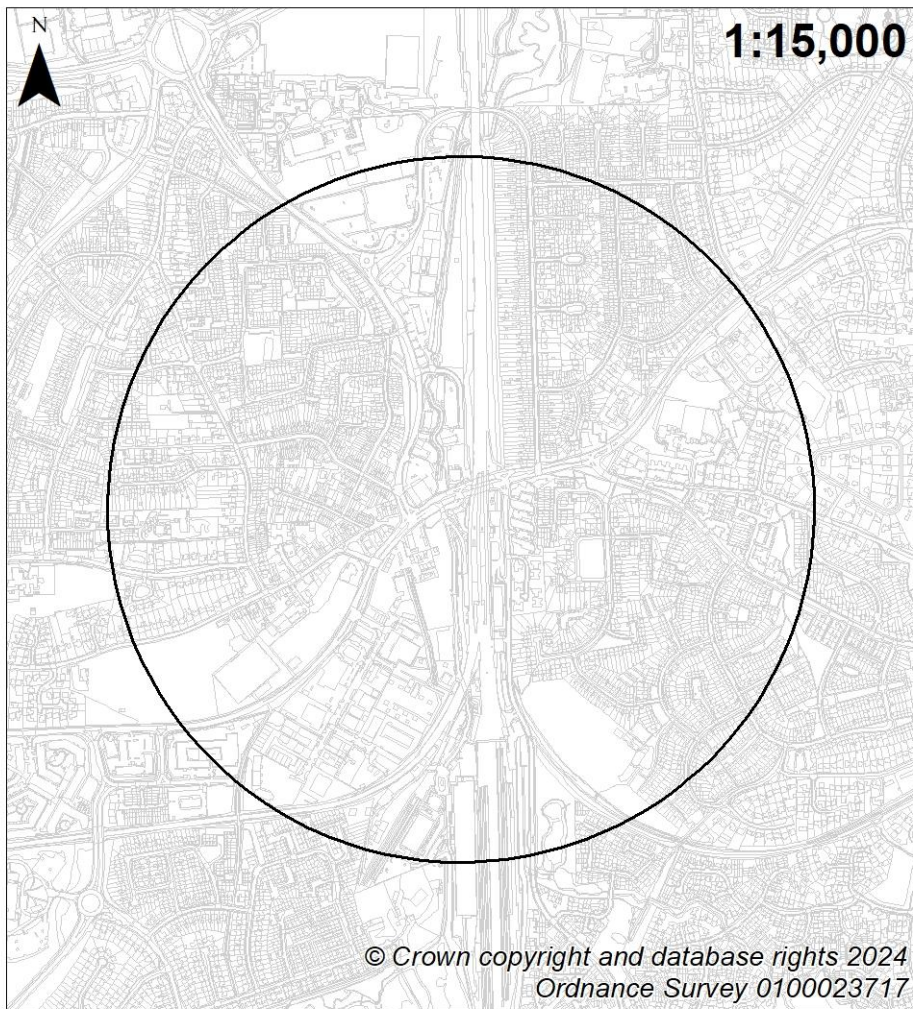
### Parking Behaviour Zones - C3 dwellings

Figure 29: Parking Behaviour Zones - C3 dwellings



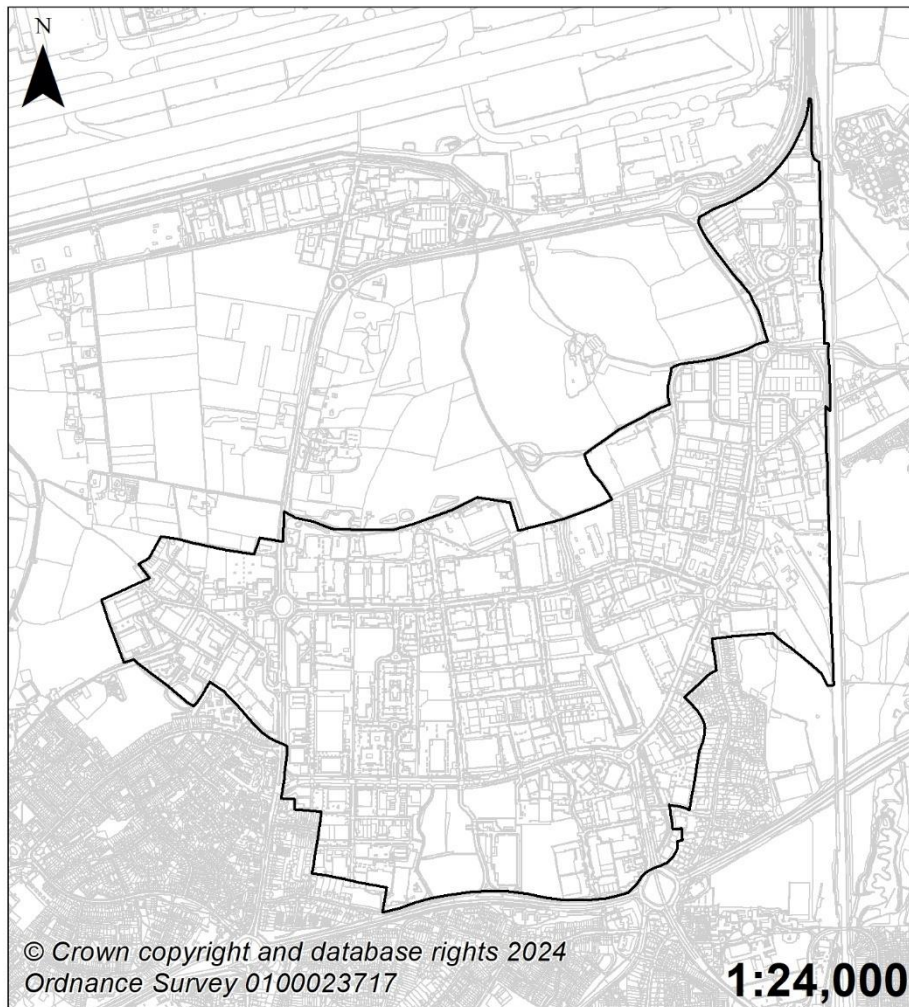
**E(g)(i) (Office) Zone 1 - Town Centre**

**Figure 30: E(g)(i) (Office) Parking Zone 1 - Town Centre**



**E(g)(i) (Office) Zone 2 - Three Bridges**

**Figure 31: E(g)(i) (Office) Parking Zone 2 - Three Bridges**



**E(g)(i) (Office) Zone 3 - Manor Royal**

**Figure 32: E(g)(i) (Office) Parking Zone 3 - Manor Royal**

# Crawley Local Plan Noise Annex

## 1.0 Introduction

- 1.1 Crawley is home to Britain's largest single-runway airport, a key sub-regional employment destination at Manor Royal Business District, and a major motorway (M23). Noise, therefore, represents an important planning consideration in the town.
- 1.2 The revocation of Planning Policy Guidance 24 (Planning and Noise) has resulted in an absence of detailed technical guidance at the national level to guide the relationship between development and noise. This Annex and the supporting Noise Topic Paper, therefore, draws upon evidence to provide policy context and establish locally specific guidance through which the approach of Local Plan Policy EP4: Development and Noise should be applied.
- 1.3 The council also recognises the inter-relationship between acoustics, ventilation, overheating and carbon minimisation. Good design needs to consider all these factors together and ensure that a solution to one single aspect is not to the detriment of the other three.

## 2.0 Planning Policy Context

### 2.1 National Policy Objectives

- 2.1.1 The National Planning Policy Framework (NPPF) sets out the Government's key planning objectives, recognising the need to reduce pollution as one of its 12 key principles. It requires the planning system to prevent new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of pollution (paragraph 170). Paragraph 180 provides more detail, outlining that local plan policies and development management decisions should avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development. Where conflict does arise, impacts must be mitigated and reduced to a minimum.
- 2.1.2 The NPPF supersedes previous national level Government planning guidance. This included Planning Policy Guidance 24: Planning and Noise, which outlined measurable numeric noise categories through which the relationship between development and noise could be assessed.
- 2.1.3 With PPG24 having been revoked, the NPPF identifies the Explanatory Note of the Noise Policy Statement for England (DEFRA, 2010) as guidance for interpreting the level at which noise is considered to give rise to significant adverse impact. However, this does not identify measurable noise values to identify the 'Significant Observed Adverse Effect Level', the noise exposure level above which significant adverse effects on health and quality of life occur.
- 2.1.4 The government has since published *Planning Practice Guidance: Noise* (MHCLG, 2019). This outlines that local authorities should take account of the acoustic environment in plan making and decision taking, and in doing so should consider:
  - whether or not a significant adverse effect is occurring or likely to occur;
  - whether or not an adverse effect is occurring or likely to occur; and
  - whether or not a good standard of amenity can be achieved.

- 2.1.5 In line with the Explanatory Note of the Noise Policy Statement for England, this would include identifying whether the overall effect of noise exposure is, or would be, above or below the Significant Observed Adverse Effect Level (SOAEL), and the Lowest Observed Adverse Effect Level for the given situation (LOAEL). The Planning Practice Guidance does not provide technical guidance to establish the levels at which SOAEL or LOAEL occur. It does, however, identify that local planning authorities may produce local plan specific noise standards to apply to various forms of proposed development and locations in their area.
- 2.1.6 ~~Section 130 of the NPPF states ‘Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents’.~~ Paragraph 134 of the NPPF states “Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:
- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or
- b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.’.
- 2.1.7 ~~Paragraph 130~~ ~~Section 127a~~ of the NPPF states that ‘*Planning policies and decisions should ensure that developments... will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development*’.
- 2.1.8 ProPG: Planning & Noise – New Residential Development (May 2017) sets out principles of good acoustic design. It recognises the importance of designing out the adverse effects of noise at an early stage, using a holistic design process that creates places that are both comfortable and attractive to live in, where acoustics is considered integral to the living environment.

## 2.2 Local Policy

- 2.2.1 The key objective of Local Plan Policy EP4 is to guide the relationship between noise sensitive development and noise sources to ensure that a good quality of life **and health** is maintained for current and future residents.
- 2.2.2 This Local Plan Noise Annex identifies locally specific noise thresholds comprised of measurable value ranges through which noise impact from transport sources can be determined in order to support Policy EP4. These are based on the noise exposure hierarchy set out in *Planning Practice Guidance: Noise* and are discussed in detail in Section 4.1 of this Annex.
- 2.2.3 This Annex also provides guidance where proposals for noise sensitive development may be affected by industrial/commercial noise sources (Section 4.2), and on Noise Generating Development (Section 4.3).

2.2.4 Local Plan Policy EP4 also refers to the ‘*Planning Noise Advice Document: Sussex*’ (2023<sup>+</sup> or latest revision), to assist in the preparation of Noise Impact Assessments. This document has been produced on a joint basis by East and West Sussex local planning authorities to provide clear and consistent guidance as to the level of information that should be submitted with planning applications for noise generating developments or noise sensitive developments, including guidance on when it is appropriate to submit a noise report and the required contents of such a report.

### 3.0 Understanding When Noise Could Become a Concern

3.1 *Planning Practice Guidance: Noise* identifies a noise exposure hierarchy which provides broad guidance on the levels at which noise exposure could become a concern. For consistency with national policy, this Noise Annex applies the noise hierarchy set out by the PPG, drawing upon technical evidence to assign measurable noise standards to each of its noise exposure categories.

3.2 At the lowest extreme, when noise is not noticeable, there is by definition no effect. As noise exposure increases, it crosses the **No Observed Effect Level**. This is the stage at which noise becomes noticeable, though it has no adverse effect as it does not cause any change in behaviour or attitude. If the noise is at this level, no specific measures are required to manage the acoustic environment.

3.3 As noise exposure increases it crosses the **Lowest Observed Adverse Effect Level**; and at this point it is an observed adverse effect ~~may reach the Observed Adverse Effect Level~~. At this level noise can start to cause small changes in behaviour, and attitude or other physiological response. For example, this could cause people to turn up the volume on the television or needing to speak more loudly to be heard. There may be some reported sleep disturbance. Where noise is identified as falling within the lowest observable adverse effect level but below the significant observed adverse effect level then it should be mitigated and reduced to a minimum. As noise approaches the significant observed adverse effect level, greater effort is likely to be required to mitigate and reduce it to a minimum proportionate to the effect. The noise level starts to have an adverse effect and steps need to be taken to mitigate and minimise those effects.

3.4 Continued increase in noise exposure will at some point cause the **Significant Observed Adverse Effect Level** to be crossed. Above this level, noise causes a material change in behaviour, attitude or other physiological response, for example necessitating that windows are kept closed most of time. If noise exposure is above this level, the planning process should be used to prevent this effect from occurring, by use of appropriate mitigation, for example through design and layout.

3.5 At the highest extreme, the **Unacceptable Adverse Level**, noise exposure would cause extensive and sustained changes in behaviour, attitude or other physiological response, without an ability to mitigate the effect of noise. At this level, the impacts on health and quality of life are such that regardless of the benefits of the activity causing the noise, noise exposure to sensitive uses should be prevented from occurring.

3.6 Although the word ‘level’ is used here, this does not mean that the effects can only be defined in terms of a single value of noise exposure. This annex states locally adopted evidence based levels for specific circumstances. However, this is not appropriate or



possible in all circumstances. Compliance with World Health Organization levels or requiring sound to be at no more than background level is not a guarantee that the noise exposure would not result in a statutory nuisance, which can be said within planning terms to unreasonably affect amenity.

- 3.7 The NPSE and PPG recognises that level of effect can ~~also~~ be described in terms of behavioural responses such as having to have windows closed or the person having to make adaptations as a result of noise. These effects can often not be described by a single or combination of sound values. In such circumstances subjective criteria may be required whether supported or not by specific sound indices.

#### **4.0 Managing Noise in Crawley: Guidance to Support Local Plan Policy EP4**

##### 4.1 Noise sensitive development affected by noise from transport sources

- 4.1.1 Local Plan Policy EP4 outlines that noise sensitive uses will only be permitted where users of the development will not be exposed to unacceptable noise disturbance from existing or proposed uses.
- 4.1.2 This section provides guidance to determine the threshold at which noise exposure from transport-based sources (air, road, rail, and mixed sources) is considered to become significant or unacceptable in a Crawley context.
- 4.1.3 Building on the noise exposure hierarchy identified in *Planning Practice Guidance: Noise*, and using the previous guidance in PPG24 and evidence identified in [Topic Paper 7 Section 6](#), the Annex identifies measurable local values through which to determine the acceptability of noise sensitive proposals where noise exposure from transport is a factor.
- 4.1.4 In particular, it identifies measurable threshold metrics for the Lowest Observed Adverse Effect Level (LOAEL), i.e. the level at which noise exposure can bring about changes in behaviour, and for the Significant Observed Adverse Effect Level (SOAEL), i.e. the noise level at which significant adverse effects on health and quality of life occur. It also outlines a measurable threshold to identify the Unacceptable Adverse Effect, this being the level at which noise exposure can cause extensive and regular changes in behaviour, attitude, and an inability to mitigate effect of noise, leading to psychological stress.
- 4.1.5 In determining the acceptability of noise sensitive proposals where noise exposure from a transport source is a factor, the standards set out in Table 1 (below) will be applied.

## NOISE ANNEX TABLE 1:

Standards for exposure at the façade<sup>177</sup> for all habitable rooms<sup>178</sup> of noise sensitive development affected by noise from transport sources.

	Examples of Outcomes	Daytime (07:00 – 23:00) Threshold	Night time (23:00 – 07:00) Threshold
<b>No Observed Adverse Effect Level (NOAEL)</b>	<b>Present and not intrusive:</b> Noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. Can slightly affect the acoustic character of the area, but not such that there is a change in the quality of life.	<p><u>&lt;51dB LAeq,16hr</u></p> <p><u>&lt;55dB LAfmax</u></p> <p>&lt;51dB LAeq,16hr</p> <p>&lt;65dB LAfmax</p>	<p><u>&lt;40dB LAeq,8hr</u></p> <p><u>&lt;48dB LAfmax</u></p> <p>&lt;45dB LAeq,8hr</p> <p>&lt;60dB LAfmax</p>
<b>Lowest Observed Adverse Effect Level (LOAEL)</b>		<p>51dB LAeq,16hr</p> <p>65dB LAfmax</p>	<p>45dB LAeq,8hr</p> <p>60dB LAfmax</p>
<b>Lowest Observed Effect Level (LOAEL)</b>	<b>Present and intrusive:</b> Noise can be heard and causes small changes in behaviour, attitude or other physiological response, e.g. turning up volume of television; speaking more loudly; where there is no alternative ventilation, having to close windows some of the time because of the noise. Potential for some reported sleep disturbance. Affects the acoustic character of the area such that there is a small actual or perceived change in the quality of life.	<p><u>Surface Transport</u> <u>Between 51dB and 55dB</u> <u>LAeq,16hr</u></p> <p><u>Aviation Transport</u> <u>51 to 54dB LAeq,16hr</u></p> <p><u>All Transport Sources</u> <u>&gt;= 55dB LAfmax</u></p> <p>Between 51dB and 55dB LAeq,16hr (51 to 54dB LAeq,16hr for aviation transport sources)</p> <p>&gt;65dB LAfmax</p>	<p><u>Surface Transport</u> <u>Between 40dB and 48dB</u> <u>LAeq,8hr</u></p> <p><u>Aviation Transport,</u> <u>Between 40dB and 48dB</u> <u>LAeq,8hr</u></p> <p><u>All Transport Sources</u> <u>&gt; 48dB LAfmax</u></p> <p>Between 45dB and 48dB LAeq,8hr for surface and aviation transport sources.</p> <p>&gt;60dB LAfmax</p>
<b>Significant Observed Adverse Effect Level (SOAEL)</b>	<b>Present and disruptive:</b> The noise causes a material change in behaviour, attitude or other physiological response, e.g. avoiding certain activities during periods of intrusion; where there is no alternative ventilation, having to keep windows closed most of the time because of the noise. Potential for sleep disturbance resulting in difficulty in getting to sleep, premature awakening, and difficulty getting back to sleep. Quality of life diminished due to change in acoustic character of the area.	<p><u>Surface Transport</u> <u>Between 55dB and 66dB</u> <u>LAeq,16hr.</u></p> <p><u>Aviation Transport</u> <u>54 to 60dB LAeq,16hr</u></p> <p><u>All Transport</u> <u>65dB to 82dB LAfmax</u></p> <p>For surface transport sources, between 55dB and 66dB LAeq,16hr (54dB to 60dB LAeq,16hr for aviation transport sources)</p> <p>65dB to 82dB LAfmax</p>	<p><u>All Transport Sources</u> <u>Between 48dB and 57dB</u> <u>LAeq,8hr.</u></p> <p><u>60dB to 82dB LAfmax</u></p> <p>Between 48dB and 57dB LAeq,8hr for surface and aviation transport sources, 60dB to 82dB LAfmax</p>
<b>Unacceptable Adverse Effect</b>	<b>Present and very disruptive</b> <b>Extensive and regular changes in behaviour, attitude or other</b>	<b>Surface Transport</b> <b>Greater than 66dB LAeq,16hr</b>	<b>All Sources</b> <b>Greater than 57dB</b>

<sup>177</sup> This is the predicted free-field level at the proposed façade and not the final 'façade' level.

<sup>178</sup> Habitable rooms includes living/dining rooms, bedrooms, kitchen diners and studies.

	Examples of Outcomes	Daytime (07:00 – 23:00) Threshold	Night time (23:00 – 07:00) Threshold
	<a href="#">physiological response and/or an inability to mitigate effect of noise leading to psychological stress, e.g. regular sleep deprivation/awakening, loss of appetite, significant medically definable harm, e.g. auditory and no- auditory.</a>	<p><b>Aviation Transport</b> Greater than 60dB <math>L_{Aeq,16hr}</math></p> <p><b>All Sources</b> &gt;82 <math>L_{AFmax}</math></p>	<p><math>L_{Aeq,8hr}</math></p> <p><b>All sources</b> &gt; 82dB <math>L_{AFmax}</math></p>
<b>Unacceptable Adverse Effect</b>	<b>Present and very disruptive</b> Extensive and regular changes in behaviour, attitude or other physiological response and/or an inability to mitigate effect of noise leading to psychological stress, e.g. regular sleep deprivation/awakening, loss of appetite, significant medically definable harm, e.g. auditory and no- auditory.	<p>For surface transport sources, greater than 66dB <math>L_{Aeq,16hr}</math></p> <p>For aviation transport sources, greater than 60dB <math>L_{Aeq,16hr}</math></p>	<p>greater than 57dB <math>L_{Aeq,8hr}</math> for surface and aviation transport sources:</p> <p>&gt; 82dB <math>L_{AFmax}</math></p>

- 4.1.6 All the above levels would include the predicted noise from any proposed or required changes in transportation noise including the potential additional southern wide spaced runway at Gatwick Airport, for which land is required to be safeguarded in the 2013 Aviation Policy Framework. The predicted noise contours associated with a possible wide-spaced southern runway at Gatwick Airport are set out in Figure 1 and 2 of the Local Plan Noise Annex. These contours in Figure 1, which are the same as those identified in Plan 31 of the Gatwick Airport Master Plan 2019 (Air Noise Map – Additional Runway – Summer Day - 2040).; The night contours in Figure 2 were produced by Jacobs in 2014 to inform the Airports Commission. These figures will be used for the purpose of determining planning applications where aviation noise is a consideration, unless otherwise indicated by the Local Planning Authority. Should the contours shown in Noise Annex Figure 1 or 2 be superseded by more up-to-date noise contours, it will be for the Local Planning Authority to decide whether these are appropriate for use in planning decisions. In the event that updated noise contours are confirmed, notification of these changes will be published on the council’s website.
- 4.1.7 In interpreting the categories for the purposes of Local Plan Policy EP4, noise exposure is considered to be acceptable where the internal noise climate achieves standards set in BS8233 or replacement guidance. (N.B. the noise levels provided in BS8233 refer to steady noise sources only). It is also expected that to achieve an acceptable internal noise climate that individual noise events shall not exceed 45dB  $L_{AFmax}$  on a frequent basis. The acceptability of the frequency of events will depend on the level of exceedance of the 45dB  $L_{AFmax}$  criteria. Up to 10 events may be acceptable for small exceedances (<5dB), whilst for high exceedances (>10dB) less than 5 events will be acceptable.
- 4.1.8 For surface transport sources, the Lowest Observed Adverse Effect Level (LOAEL) is 51dB  $L_{Aeq,16hr}$  and 45dB  $L_{Aeq,8hr}$  at night. The Significant Observed Effect Level (SOAEL) is between 55dB and 66dB  $L_{Aeq,16hr}$  and between 45dB and 57dB  $L_{Aeq,8hr}$  at night. The Unacceptable Adverse Effect occurs where noise exposure is above 66dB  $L_{Aeq,16hr}$  (57dB  $L_{Aeq,8hr}$  at night).
- 4.1.9 For aviation transport sources, the Lowest Observed Adverse Effect Level (LOAEL) is 51dB  $L_{Aeq,16hr}$  and the Significant Observed Adverse Effect Level is between 54dB and

60dB  $L_{Aeq, 16hr}$ . The Unacceptable Adverse Effect occurs where noise exposure is greater than 60dB  $L_{Aeq, 16hr}$  (57dB  $L_{Aeq, 8hr}$  at night). The lower standard for the day period is required as aviation noise affects the whole neighbourhood and not just a single façade as with surface transport. This is less of an issue at night so the level is the same as for surface transport.

- 4.1.10 For private amenity areas (private and communal gardens), the upper limit of noise exposure is considered to be 50dB  $L_{Aeq, 16hr}$ , so that they can be enjoyed as intended. Where this is not possible to achieve despite implementing all reasonable mitigation measures, the standard can be relaxed by 5dB so that the sound level in private and communal gardens (including balconies) does not exceed 55dB  $L_{Aeq, 16hr}$ . In very high noise areas where the less stringent standard of 55dB  $L_{Aeq, 16hr}$  cannot reasonably be achieved, with careful design it should be achieved in some parts of the amenity space. In the case of balconies then the use of winter gardens must be considered.
- 4.1.11 Where noise exposure is likely to be of a material concern (LOAEL or SOAEL), a Noise Impact Assessment will be required in support of planning applications to demonstrate how noise impact will be made acceptable. For further information on the requirements of a Noise Impact Assessment, please see Section 5 of this Annex, ProPG and *Planning Noise Advice Document: Sussex (2023~~4~~)* or latest version).
- 4.1.12 Any development where an acceptable internal noise climate cannot be achieved with windows opened must employ all reasonable mitigating steps with regards to window and façade design to allow the dwelling to be ventilated naturally. Where this is not possible alternative natural forms of ventilation must be provided by use of acoustic louvres or ventilators of adequate size to effectively deal with the effects of summer over-heating without the necessity to open the windows. The need for ventilation as a result of overheating (giving rise to discomfort and health effects) shall be minimised in the design, layout and features of the building having regard to the cooling hierarchy in Policy SDC1: Sustainable Design and Construction.
- 4.1.13 If it can be clearly demonstrated that this cannot be achieved, then as a last resort, in exceptional circumstances, alternative mechanical ventilation may be acceptable. Any mechanical forms of ventilation must achieve an internal Noise Rating Curve of 25 (NR25) or lower. Where Mechanical Ventilation and Heat Recovery (MVHR) is used it will be expected to have a 100% fully automated, modulated, summer bypass. Furthermore, when operating at maximum boost the in duct velocity shall be kept as low as reasonably practicable but in any event no greater than 3.5 metres per second and the motor capacity at no more than 70% of operating capacity unless it can be demonstrated that an alternative design criteria can deliver a suitable internal acoustic environment. The fan unit shall not be sited within bedrooms and any air inlets and outlets shall be acoustically treated to prevent noise ingress. The use of sealed windows will not be acceptable as they do not create a suitable living environment for the occupants.
- 4.1.14 Evidence of satisfactory implementation of the agreed mitigation will be required for developments in the SOAEL category. This would be the form of a post completion report to be submitted to and agreed by the LPA once the development has been completed and prior to occupation or sale.

## 4.2 Noise sensitive development affected by industrial or commercial noise sources

- 4.2.1 Local Plan Policy EP4 outlines that noise sensitive uses proposed in areas that are exposed to noise from existing or planned industrial or commercial sources, will only be permitted where future users will not be exposed to an unacceptable noise impact. For example, the creation of a statutory nuisance. This reflects the approach of NPPF Para 170(e).
- 4.2.2 This is based on the recognition that to introduce new noise sensitive receptors into locations where they may be affected by noise from established businesses can create conflict between those two uses and may prejudice the existing and future industrial or commercial operations.
- 4.2.3 NPPF paragraph 182 expands, recognising that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.
- 4.2.4 It is also recognised that some industrial or commercial uses may be planned, in the sense that they are subject to an extant planning permission, or have been identified for economic use through the Local Plan. For this reason, the policy approach also has regard to future planned developments.
- 4.2.5 To ensure that proposed noise sensitive uses do not conflict with existing or planned industrial/commercial uses, noise sensitive development will only be considered acceptable where future users would not be exposed to noise impact that would result in, for example, a statutory nuisance.
- 4.2.6 To ensure that proposals are acceptable in noise terms, an assessment should be made using BS4142:2014 + A1:2019 *Method for Rating and assessing industrial and commercial sound*, or any replacement guidance.
- 4.2.7 Where there is risk that noise sensitive proposals would be affected by noise that may, for example, create a statutory nuisance, a Noise Impact Assessment will be required in support of planning applications to demonstrate how that noise impact will be made acceptable. For further information on the requirements of a Noise Impact Assessment, please see Section 5 of this Annex, and *Planning Noise Advice Document: Sussex* (2021 or latest revision).
- 4.2.8 If it cannot be demonstrated that appropriate mitigation will be provided to manage significant or unacceptable noise impacts to an acceptable level, the proposal will be refused.
- 4.2.9 Where it is proposed to have a mixed-use development of residential and commercial units combined then there must be adequate sound insulation between the commercial and residential uses. In such circumstances a minimum DnTW of 65dB would be required.

### 4.3 Noise generating development

- 4.3.1 Local Plan Policy EP4 outlines that noise generating development will be permitted where it can be demonstrated that any nearby noise sensitive uses (as existing or

planned), will not be exposed to noise impact that will adversely affect the amenity of users of surrounding noise sensitive premises.

- 4.3.2 To ensure that proposals are acceptable in noise terms, development should comply with BS4142:2014 + A1:2019 *Method for Rating and assessing industrial and commercial sound*, or any replacement guidance.
- 4.3.3 When assessing the noise impact using BS 4142 the Noise Rating level must be equivalent to the background ( $L_{A90}$ ) level. BS4142 advises that there are locations where existing noise levels are high and might result in adverse impacts themselves. Therefore when existing noise levels exceed 50dB  $L_{Aeq,1hr}$  during the day or 40dB  $L_{Aeq,15mins}$  during the night the Noise Rating Level must be at least 3dB below the background ( $L_{A90}$ ) level.
- 4.3.4 The daytime figure relates to the upper limit for external amenity areas and the night time figure relates to the maximum external noise level required to achieve the 30dB  $L_{Aeq,8hr}$  level specified in BS8233 for undisturbed sleep with windows wide open.
- 4.3.5 Where there is risk that development would adversely affect the amenity of users in surrounding noise sensitive premises, a Noise Impact Assessment will be required in support of planning applications, to demonstrate how noise impact will be made acceptable. For further information on the requirements of a Noise Impact Assessment, please see Section 5 of this Annex, and *Planning Noise Advice Document: Sussex (2023* [†](#) or latest revision).
- 4.3.6 If it cannot be demonstrated that appropriate mitigation will be provided to manage noise impact to an acceptable level, the proposal will be refused.

## **5.0 Noise Impact Assessment**

- 5.1 As identified in Part C of Local Plan Policy EP4, a Noise Impact Assessment will be required to support applications where noise sensitive uses are likely to be exposed to significant or unacceptable noise exposure.
- 5.2 The Noise Impact Assessment will be required to assess the impact of the proposal as a noise generator or receptor, as appropriate.
- 5.3 It will also be required to demonstrate in full how the development will be designed, located, and controlled to mitigate (as appropriate) the impact of noise on health and quality of life, neighbouring properties, and the surrounding area.
- 5.4 In some circumstances, reliance on a third party structure may not be acceptable as a part of a noise control proposal.
- 5.5 In all cases, the best practical means (or ‘all reasonable steps’) of mitigation will be required to mitigate noise impact to an appropriate level, and in liaison with Crawley Borough Council Environmental Health. In some circumstances this may include the use of alternative sites to the one proposed.
- 5.6 If it cannot be demonstrated that appropriate mitigation will be provided to manage significant or unacceptable noise impacts to an acceptable level, the proposal will be refused.

5.7 In preparing a Noise Impact Assessment, applicants should adhere to *Planning Noise Advice Document: Sussex* (2023<sup>1</sup> or latest revision), which supports Local Plan Policy EP4 and this accompanying Annex. **Where there is any disagreement between that document and the Crawley Local Plan documents, the Local Plan documents take precedence.**

## **6.0 Further Reference**

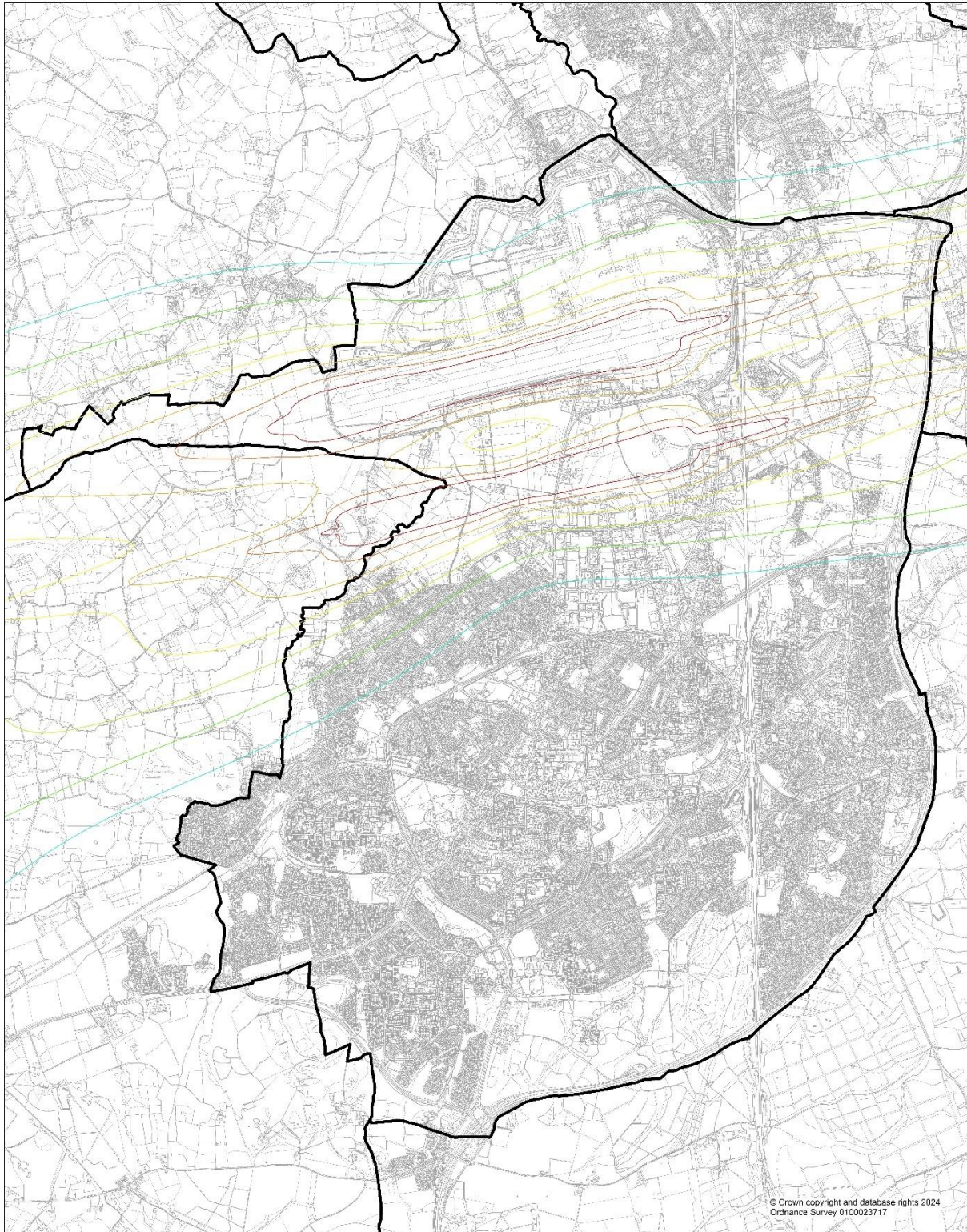
6.1 Where development proposals are likely to be affected by noise, either as a source or receptor, applicants are strongly encouraged to liaise with Crawley Borough Council Environmental Health prior to submitting an application.

6.2 To contact Environmental Health please email [environmentalservices@ Crawley.gov.uk](mailto:environmentalservices@ Crawley.gov.uk).

**NOISE ANNEX SUMMER DAY (07:00 – 23:00) WIDE-SPACED 2040 NOISE CONTOURS  
( $L_{Aeq, 16hr}$ ) TAKEN FROM PLAN 31 OF THE GATWICK AIRPORT MASTER PLAN 2019**

**Summer Day Wide Spaced 2040 (Gatwick Airport Master Plan 2019)**

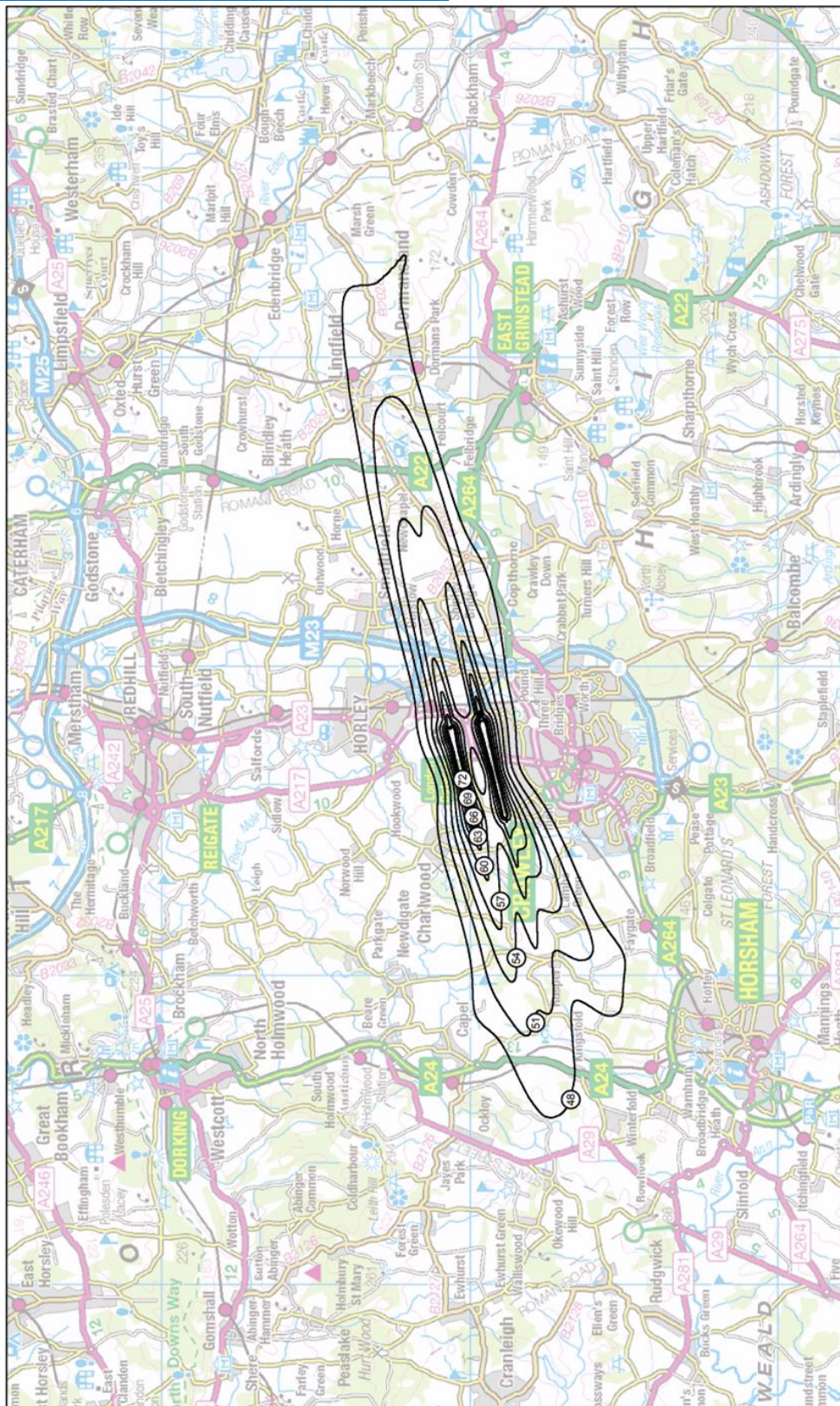
72dB 69dB 66dB 63dB 60dB 57dB 54dB



**Figure 33: Noise Annex Summer Day Wide-Spaced 2040 Noise Contours**



**NOISE ANNEX FIGURE 2: SUMMER NIGHT (23:00 – 07:00) WIDE-SPACED 2040 NOISE CONTOURS (L<sub>Aeq</sub>, 8hr) TAKEN FROM PAGE E-83 AIRPORTS COMMISSION COMPENDIUM PRODUCED BY JACOBS<sup>179</sup>**



G40-2R-X-C: Gatwick 2040 do-something, GAL - no sensitivity test, Carbon Traded  
Summer average 8-hour night-time L<sub>Aeq</sub>,8h

E-83

<sup>179</sup> (<https://assets.publishing.service.gov.uk/media/5a809e34e5274a2e87dbad69/airports-commission-compendium-of-results-part-E-06.pdf>)

## Housing Trajectory Base Date 31 March 2023

# Housing Trajectory - Base Date 31 March 2023

## Summary Trajectory

Local Plan Year			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	Total 2023- 40
	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	2035/ 36	2036/ 37	2037/ 38	2038/ 39	2039/ 40	
Gross (incl. permitted small sites 2023-27)	359	190	213	185	311	645	550	60	498	537	647	24	0	0	0	0	0	0	0	3670
Losses	-3	0	-1	0	0	0	0	0	-13	-5	0	-6	0	0	0	0	0	0	0	-25
Net	356	190	212	185	311	645	550	60	485	532	647	18	0	0	0	0	0	0	0	3645
Windfalls (excl. permitted small sites 2021-26)	0	0	0	98	99	100	100	100	100	100	100	100	100	100	100	100	100	100	100	1597
Communal Accommodation	0	0	0	0	0	81	0	0	0	-31	33	0	0	0	0	0	0	0	0	83
Projected net delivery	356	190	212	283	410	826	650	160	585	601	780	118	100	100	100	100	100	100	100	5325

**Local Plan Housing Requirement 2023-40**

**5330**

**Stepped Requirement for Years 1 to 5 of Local Plan Period**

**386 + 386 + 386 + 386 + 386 = 1930**

**Stepped Requirement with 10% buffer added**

**2123**

**Projected net completions in Years 1 to 5**

**2381**

**Years' supply projected for Years 1 to 5**

**5.6**







# Employment Land Trajectory Base Date 31 March 2023

Employment Land Trajectory  
Base Date 31 March 2023

Site Reference	Site/Location	Commentary	Planning Reference	Suitable	Available	Achievable	Site Area (Ha)	Business Floor space (Sqm)	Office floor space (Sqm)	Industrial & Warehouse floor space (Sqm)	Other Employment Floorspace (Sqm)	Office (Ha)	Industrial & Warehouse Land (Ha)
<b>Sites Deliverable</b>													
A	Wingspan Club	Landowner, CBC Property, assessing options for development of site.	N/A	Yes	Yes	Yes	0.43	0	0	0	0	0	0.43
B	Former GSK Site (north and west land parcel)	Permission CR/2014/0415/ARM relates to the north and west land parcel. It permits development of 2 data storage halls (Buildings 1 and 2), an emergency power building (Building 3), and a business hub building comprising café at ground floor with offices above (Building 4). Building 1 is complete and occupied - it provides 13,431sqm B8 on a 2.106 ha plot and is no longer included in the ELT.  Building 2 provides approx. 1,521sqm B1a and 19,391sqm B8 on a 2.59ha plot. Work is yet to commence on this building. Building 3 provides 2,696sqm plant on a 0.2ha plot. Building 4 provides 1,433sqm B1a office and 87sqm A3 cafe on a 0.4ha plot.	CR/2014/0415/ARM	Yes	Yes	Yes	3.19	22,345	2,954	19,391	87	0.565	2.4
C	Elekta, London Road and Fleming Way (Phase 2)	Phase 1, Building A (11,828 Sqm B1a floorspace) is complete. Phase 2, for the erection of a second building to provide 4,345 Sqm B1a floorspace is not built out.	CR/2014/0760/FUL	Yes	Yes	Yes	0.4	4,345	4,345	0	0	0.4	0.0
D	Land at Jersey Farm (Site A)	Planning Permission CR/2019/0696/FUL for a B8 warehouse, associated landscaping and car parking. Development commenced.	CR/2019/0696/FUL	Yes	Yes	Yes	0.69	2,095	0	2,095	0	0.00	0.69
E	Land at Faraday Road & Manor Royal	Planning permission for demolition of the existing B8 warehouse and B1a office buildings and the construction of a new warehouse with ancillary offices.	CR/2021/0174/FUL	Yes	Yes	Yes	1.45	7,397	0	7,397	0	0.00	1.45
F	Tilgate Forest Business Park, Vacant Plot	Site is located in the Tilgate Forest Business Park Main Employment Area. Discharge of condition relating to permission CR/2013/0423/FUL for 2 x three storey office blocks extension of time. Office development is subject to a technical commencement and is therefore extant.	CR/2017/0346/FUL	Yes	Yes	Yes	0.9	4,630	4,630	0	0	0.9	0
G	Southways, London Road	Site is situated within land that is subject to Gatwick Airport Safeguarding. However, Certificate of Lawfulness CR/2013/0008/192 confirms that development for twin office buildings is commenced and extant. Site is currently in depot use on a temporary basis.	CR/2013/0008/192 CR/2013/0094/FUL	Yes	Yes	Yes	2.83	3,241	3,241	0	0	2.83	0
H	County Buildings, Northgate Avenue	Site included in WSCC Asset Management Strategy and is identified as a priority for mixed-use residential and commercial (office) development. Assumption is for 75% of the site to be dedicated to housing, with 25% (plot ratio 2.0) dedicated to office use. Completion is anticipated no later than 2025.	N/A	Yes	Yes	Yes	1.04	5,200	5,200	0	0	0.26	0
I	Moka, Station Way	Residential-led mixed-use development. Will deliver 650sqm ground floor commercial floorspace, this being flexible within use classes A1/A3/A4/B1/D1 and split between 2 to 4 units.	CR/2019/0542/FUL	Yes	Yes	Yes	0.36	650	650	0	0	0.36	0
							<b>11.29</b>	<b>49,903</b>	<b>21,020</b>	<b>28,883</b>	<b>87</b>	<b>5.32</b>	<b>4.97</b>

Site Reference	Site/Location	Commentary	Planning Reference	Suitable	Available	Achievable	Site Area (Ha)	Business Floor space (Sqm)	Office floor space (Sqm)	Industrial & Warehouse floor space (Sqm)	Other Employment Floorspace (Sqm)	Office (Ha)	Industrial & Warehouse Land (Ha)
<b>Allocation for a Strategic Employment Location</b>													
J	Land East of Balcombe Road and South of M23 Spur (Gatwick Green)	The Local Plan allocates land at East of Balcombe Road and south of the M23 spur, referred to as Gatwick Green, for development of an industrial-led Strategic Employment Location of a minimum 17.93ha, predominantly of B8 storage and distribution warehouse (Class B8) uses, supported by light industrial and general industrial and a limited amount of complementary ancillary uses that support the principal storage and distribution function. The allocation will meet Crawley's outstanding business land supply requirement, which equates to a minimum of 62,737sqm B8 floorspace.  A total area of 44ha land is included in the allocation boundary - however, any industrial floorspace or ancillary uses beyond the identified 17.93ha need must be justified by appropriate evidence. The identified site is larger because of the need for the strategic development to provide comprehensive supporting infrastructure, appropriate landscaping and to protect the amenity of neighbouring properties. There may be scope, where justified by evidence, for further industrial uses and supporting uses catering for the needs of employees.	Allocated in Reg. 19 Local Plan	Yes	Yes	Yes	44	62,737	N/A	62,737	N/A	0	17.93
							<b>44.00</b>	<b>62,737</b>	<b>0</b>	<b>62,737</b>	<b>0</b>	<b>0</b>	<b>17.93</b>

	Office floor space (Sqm)	Industrial & Warehouse floor space (Sqm)	Total Business Floorspace (Sqm)	Office (Ha)	Industrial & Warehouse Land (Ha)	Total Business Land (Ha)
Sites Deliverable	21,020	28,883	49,903	5.32	4.97	10.29
Gatwick Green SEL	0	62,737	62,737	0.00	17.93	17.93
Local Plan Total	<b>21,020</b>	<b>91,620</b>	<b>112,640</b>	<b>5.32</b>	<b>22.90</b>	<b>28.22</b>