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**Our ref:** KT/2011/113399/CS-11/EW1-L01  
**Your ref:**  
**Date:** 25 March 2024

Dear Elizabeth

### **Crawley Borough Local Plan Main Modifications Consultation: SA and HRA**

Thank you for your consultation on the Main Modifications. We have the following comments to make.

#### **MM33, Page 30, Para 15.51**

Please insert the following additional text as highlighted below.

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 (**including reference to the Environment Agency's published Mole Abstraction Licensing Strategy**) and demonstrating with certainty that the alternative supply source does not impact upon the Arun Valley sites.

#### **MM34, Page 31, EP1**

MM34 highlights two modifications to Policy EP1. No objection to these modifications.

In addition, "Amend Policy EP1, Part v: ...development will: ...not be permitted to take place within 8 metres from the edge of bank of any Main River or from any Ordinary Watercourse, nor within 3 metres of any sewer system without prior consent from the appropriate authority;" **Opportunities for ecological enhancements should be explored through implementation of Water Framework Directive mitigation measures contained in the Environment Agency's Catchment Planning System (CPS), see Appendix X [XLS list of mitigation measures attached]; development proposals should not prejudice the future**

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**implementation of CPS measures.**

**Crawley Borough Modifications Local Plan 2023 to 2040, February 2024 - Development and Flooding section which contains Policies EP1 and EP2.**

Note that the proposed modifications as set out in MM34 are reflected in this document within Policy EP1. Also note that paragraph 16.15 has been updated to highlight the 2023 SFRA applies the precautionary approach to identifying Flood Zone 3b using the 2% AEP output, which is welcomed.

**Crawley Local Plan Sustainability Appraisal, February 2024 - Topic Area A includes the risk to flooding.** Paragraphs A12, A13 and A15 all have proposed modifications. No objection to any of these proposed additions to the text.

If you require any further information, please do not hesitate to contact me.

Yours sincerely

**Mrs Michelle Waterman-Gay**  
**Planning Advisor**

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WFD water body ID	WFD water body name	Title	Description	Easting	Northing
GB106039017481	Mole upstream of Horley	River Mole: Installation of large woody material as deflectors to help improve flow diversity, especially along straightened sections (between confluences with Gatwick Stream & Man's Brook)	Section was previously restored in 1999, but could use some additional work. TQ2758942427 to TQ2569940964	527589	142427
GB106039017481	Mole upstream of Horley	River Mole (upstream of Gatwick airport): Channel is incised and disconnected from the floodplain. Reconnect the floodplain by creating wetlands and re-grading the banks in places. Additional woody material in channel would help flow diversity.	TQ2473940806 to TQ2473940806	524739	140806
GB106039017481	Mole upstream of Horley	River Mole: Reconnect backwater upstream of Amberley Farm (Gatwick) to provide additional habitat and refuge.	Potentially requires a large amount of sediment to be removed to drop the backwater to current river levels, with difficult machine access.	525877	139165
GB106039017481	Mole upstream of Horley	River Mole: Use a geotextile or coir matting to provide some habitat on outfall edges at Crawley Rugby Club	-	525399	138659
GB106039017481	Mole upstream of Horley	River Mole: Modify bridge soffit at Ifield Green to allow for fish passage and sediment passage (if possible).	A series of rock weirs downstream would hold water levels high enough to allow for fish passage in normal flow conditions. Can't increase flood risk.	525128	138372
GB106039017481	Mole upstream of Horley	Crawler's Brook: Install more large woody material to help improved the diversity of in-channel habitats downstream of Fleming Way	TQ2767939427 to TQ2790839131	527679	139427
GB106039017481	Mole upstream of Horley	Crawler's Brook: Ensure that sediment from the river crossing is not entering the watercourse (at Rowley Farm, upstream of Gatwick)	Appears to be a cattle crossing with high amounts of unconsolidated sediment on the bridge and next to the watercourse.	527680	139428
GB106039017481	Mole upstream of Horley	Crawler's Brook: De-culvert section in Three Bridges where possible and create natural banks with transition between the watercourse and floodplain. Opportunity to re-meander the channel next to the balancing pond which has become full with sediment.	Subject to approval from flood risk and ensuring the land is not contaminated. Lots of Himalayan Balsam present, especially in the upper part of the section. TQ2790939111 to TQ2813638466	527909	139111
GB106039017481	Mole upstream of Horley	Crawler's Brook: Remove weir and culvert underneath footpath at Sussex Manor Business Park and replace with a clear span bridge.	-	528059	138678
GB106039017481	Mole upstream of Horley	Crawler's Brook: Either remove culvert upstream of Gatwick Road as part of a large planning application, or introduce some planting to improve marginal habitat.	Need to ensure flood risk is not increased. TQ2815738838 to TQ2821738220	528157	138388
GB106039017481	Mole upstream of Horley	Crawler's Brook: Remove culvert from Gatwick Road to Woodfield Road under main road and houses and create an open natural channel.	Requires major planning application looking at a total reworking of the land use in the area. TQ2820238066 to TQ2791337778	528202	138066
GB106039017481	Mole upstream of Horley	Crawler's Brook: Remove weir upstream of Cloverlands and any associated culvert to allow for fish/invertebrate/sediment passage.	-	527888	137652
GB106039017481	Mole upstream of Horley	Crawler's Brook: Remove weir and any associated culvert at downstream end of Northgate Playing Field to allow for natural processes to re-establish.	-	527847	137564
GB106039017481	Mole upstream of Horley	Crawler's Brook: Remove culvert pipe under footpath at Northgate Playing Field to remove impoundment and allow restoration of natural processes.	-	527818	137469
GB106039017481	Mole upstream of Horley	Crawler's Brook: Remove trash screen upstream of culvert pipe at Northgate Playing Field	Requires the removal of the culvert pipe initially to remove the requirement of the trash screen.	527818	137469
GB106039017481	Mole upstream of Horley	Crawler's Brook: Channel is overwide adjacent to Northgate Avenue/A2004, impounded in places and over managed. Install deflectors in channel and improve marginal habitat.	Requires the removal of impoundments to allow natural processes to re-establish. TQ2784537566 to TQ2767737223	527845	137566
GB106039017481	Mole upstream of Horley	Crawler's Brook: Remove weir to remove impoundment upstream, downstream of footbridge near Northgate Avenue/A2004.	-	527689	137237
GB106039017481	Mole upstream of Horley	Crawler's Brook: Remove concrete culvert and reinstate natural banks, downstream of footbridge near Northgate Avenue/A2004.	Culvert is already partially failing and erosion is occurring around the back on the left bank.	527689	137237
GB106039017481	Mole upstream of Horley	Crawler's Brook: Remove failed culvert and replace with green bank defence adjacent to Northgate Avenue/A2004.	Culvert is being undermined on the left bank. Some protection needed as there is a footpath on the left bank with limited space.	527568	137129
GB106039017460	Ifield Brook	Evaluate extent of colonisation of Signal Crayfish	Evaluate extent of colonisation of the Signal Crayfish and assess its impact on the fish community. If necessary undertake measures to eradicate or control population.	524690	138000
GB106039017460	Ifield Brook	Ifield Mill Pond - Install floating vegetative islands or floating reed beds	Ifield Mill Pond - Install floating vegetative islands or floating reed beds to reduce the levels of phosphorous and create nursery grounds for fish & inverts.	524430	136000
GB106039017460	Ifield Brook	Combined measure to ensure compliance with various consents and private discharges in the water body	Combined measure to ensure compliance with various consents and private discharges in the water body	-	-
GB106039017460	Ifield Brook	Section downstream of Ifield Mill Stream and Ifield Brook confluence - manage poaching from humans	-	524585	137237
GB106039017460	Ifield Brook	Upstream Newstead Lodge, Ifield Brook. Poaching of bank from human activity causing sediment mobilisation	-	524632	137851
GB106039017460	Ifield Brook	Fish pass at 2 large weirs at Ifield mill pond and waterfield gardens and 6 smaller weirs	Combined measure to make obstructions on the Ifield brook passable to fish and eels. Including 2 large weirs at Ifield mill pond and waterfield gardens and 6 smaller weirs/sluices	524263	135852
GB106039017460	Ifield Brook	Channel enhancements and habitat creation on soft banked areas of the Ifield Brook (4.1km)	Combined measure for channel enhancements and habitat creation on soft banked areas of the Ifield Brook that require it. 4.1km	-	-
GB106039017460	Ifield Brook	Channel enhancements and habitat creation for hard banked areas of the Ifield Brook (5.5km)	Combined measure for channel enhancements and habitat creation for hard banked areas of the Ifield Brook (5.5km)	-	-
GB106039017460	Ifield Brook	Reconnect old meanders in the floodplain	Reconnect an old meander either as a back water to provide refuge or to increase channel length. Straightened section should be encouraged to meander more to create diversity. Approx 350 m.	524556	137423
GB106039017460	Ifield Brook	Remove hard banking on Spruce Hill Brook	Spruce Hill Brook: Remove culverts along the Brook, especially alongside the park (TQ2395134664 to TQ2394335664)	523951	134664
GB106039017460	Ifield Brook	Remove weir at Copeland House (ID: 11551)	Broadfield Brook: Remove or modify the weir (id: 11551) at Rathlin Road to allow for fish and sediment passage. May be some increase in channel erosion upstream	526005	135148
GB106039017460	Ifield Brook	Remove weir at Broadfield House (ID: 12206)	Broadfield Brook: Remove or modify the weir (id: 12206) at Broadfield Park to allow for fish and sediment passage. Consider impacts on pond upstream	526547	134645
GB106039017450	Stanford Brook	Investigate if culvert is negatively affecting fish passage (Gatwick Stream at Maidenbower Drive)	-	529722	135971
GB106039017450	Stanford Brook	Investigate weir removal or fish pass installation at weir downstream of Worth Farm at TQ3012235935 (Gatwick Stream)	-	530122	135935
GB106039017450	Stanford Brook	Investigate weir removal or fish pass installation downstream of Worth Farm at TQ3007935932 (Gatwick Stream)	-	530079	135932
GB106039017450	Stanford Brook	Investigate if fish passage is inhibited where the channel is culverted under the M23 e.g. TQ2880534184	-	528805	134184
GB106039017450	Stanford Brook	Combined measure to tackle agricultural diffuse pollution	Catchment-wide measure	-	-
GB106039017450	Stanford Brook	Low cost habitat improvements made in channel in the urban section of the catchment	-	528891	136458
GB106039017500	Tilgate Brook and Gatwick Stream at Crawley	Combine measure to tackle Urban diffuse pollution in Crawley	Catchment-wide measure	-	-
GB106039017500	Tilgate Brook and Gatwick Stream at Crawley	Combined measure to tackle Agricultural diffuse pollution	Catchment-wide measure	-	-
GB106039017500	Tilgate Brook and Gatwick Stream at Crawley	Notch 2 weirs at Gratans Park upstream of the A211 (TQ 28842 37832 to TQ 28957 38337)	-	528841	137832

GB106039017500	Tilgate Brook and Gatwick Stream at Crawley	Create two stage narrow channel along old course of the river at Grattons Park, bypassing two weirs	Create two stage narrow channel along old course of the river at Grattons Park, bypassing two weirs	528887	138072
GB106039017500	Tilgate Brook and Gatwick Stream at Crawley	Notch low flow channel in culverts	Catchment-wide measure	-	-
GB106039017500	Tilgate Brook and Gatwick Stream at Crawley	Create two-stage narrow channel between Tinesley Bridge (Radford Road) and Crawley STW	-	529139	139689
GB106039017500	Tilgate Brook and Gatwick Stream at Crawley	Carry out work to make 7 small weirs in the catchment passable to fish	-	-	-
GB106039017500	Tilgate Brook and Gatwick Stream at Crawley	Modify Gatwick Link gauging station (id: 3229TH) to enhance fish passage	Located downstream of the A23 on the boundary of Crawley and Reigate & Banstead	528519	141717
GB106039017500	Tilgate Brook and Gatwick Stream at Crawley	Install deflectors at various locations where channel is out of culvert to increase habitat diversity	-	529164	139047
GB106039017500	Tilgate Brook and Gatwick Stream at Crawley	Install coir rolls on hard banks along Gatwick Stream, Crawlers Brook and Tilgate Stream	Catchment-wide measure	528833	136608
GB106039017500	Tilgate Brook and Gatwick Stream at Crawley	Introduce gravels at appropriate points along the water body to create some riffles. Gatwick Stream, upstream of Cornwell Avenue, Forge Wood	-	529164	139284
GB106039017500	Tilgate Brook and Gatwick Stream at Crawley	Create low energy backwater areas above Tinesley Bridge (Radford Road) and Riverside Garden Park	-	528191	142090
GB106039017500	Tilgate Brook and Gatwick Stream at Crawley	Open up tree canopy along the catchment to improve light to the watercourse	Tree thinning across the catchment, in particular at Riverside Garden Park and Stephenson Industrial Estate	528694	136832