



Crawley 2035

Ref No:

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Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council
by 5pm on 2 March 2020.

Representations can be made via this form and emailed to forward.planning@crawley.gov.uk or sent via post to: Local Plan Consultation, Strategic Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, RH10 1UZ. Alternatively, representations can be made online using the [eform](#) which allows attachments of documents.

This form has two parts:

PART A – Personal details

By law, representations cannot be made anonymously. All representations will be published alongside your name, company name (if applicable), and your client's name/company (if applicable). The Council will use the information you submit to assist with formulating planning policy.

Further information about Data Protection Rights in line with the provisions of the General Data Protection Regulations and Data Protection Act 2018, for example, how to contact the Data Protection Officer, how long information is held or how we process your personal information can be found at www.crawley.gov.uk/privacy. Specific reference to the Local Plan and planning policy related public consultation can be found on: www.crawley.gov.uk/pw/web/PUB351893

PART B – Your representation

Please fill in a separate sheet for each representation you wish to make. You may submit multiple "PART B" sections with a single "PART A" completed.

PART A – Personal details

Please ensure that you complete all fields in 1. If a planning agent is appointed, please enter the Title, Name and Organisation in 1, and complete the full contact details of the agent in 2.

1. Personal details

2. Agent's details

Title: MR

First name: CAVIN

Surname: CALLAGHER

Organisation: RAINIER DEVELOPMENTS LTD

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Town/city: HENLEY IN ARDEN

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PART B – Your representation

3. Please tick the document that you would like to make a representation on:

- Crawley submission Local Plan
- Crawley submission Local Plan Map
- Crawley submission Sustainability Appraisal
- Habitats Regulation Assessment Screening Report

4. Which part of the Local Plan does this representation relate to? SEE ATTACHED LETTER

Paragraph:

Policy:

Other:

5. Do you consider the Local Plan to be: (Please tick)

- | | | |
|---|------------------------------|-----------------------------|
| 5.1. Legally compliant? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 5.2. Sound? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 5.3. Compliant with the duty to co-operate? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

6. Please give details explaining your response to 5.1, 5.2, or 5.3 below. Please be as clear as possible.

If required, please continue your response on an additional piece of paper and securely attach it to this response

- 7. Please set out what modification(s) you consider necessary to resolve the issues you have identified above. You need to state why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to suggest how the wording of any policy or text should be revised. Please be as clear as possible. Any non-compliance with the duty to co-operate is incapable of modification at examination.**

PLEASE SEE ATTACHED LETTER

If required, please continue your response on an additional piece of paper and securely attach it to this response

Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations. After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues s/he identifies for examination.

- 8. If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings? (Please tick)**

No, I do not wish to participate in the examination hearings

Yes, I wish to participate in the examination hearings

- 9. If you wish to participate in the public examination hearings, please outline why you consider this to be necessary:**

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

If you would like to make a representation on another policy or part of the Local Plan then please complete a separate PART B section of the form or securely attach an additional piece of paper. Copies of the representation form can also be downloaded from the council's website at: www.crawley.gov.uk/crawley2035

Signature



Date

2 March 2020

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

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VIA EMAIL

2nd March 2020

Dear Sir/Madam,

REPRESENTATIONS TO THE DRAFT CRAWLEY BOROUGH LOCAL PLAN 2020 -2035 JANUARY 2020 FOR SUBMISSION PUBLICATION CONSULTATION – LAND AT MOKA, CRAWLEY

These representations have been prepared by Rainier Developments Ltd (Rainier) to the draft Crawley Borough Local Plan 2020 – 2035 January 2020 Submission Publication Consultation (Draft Local Plan) in relation to our land interests at land south of Station Way, MOKA, Crawley (the Site). The Site is referred in the Draft Local Plan as MOKA at Strategic Policy TC3: Development Sites within the Town Centre Boundary and Strategic Policy H2: Key Housing Sites.

The Site is currently subject to a full planning application (CR/2019/0542/FUL), with the following description of development:

"Demolition of existing nightclub and redevelopment of site providing 152 apartments, Ground Floor Commercial / Retail space (Class A1, A3, A4, B1 and/or D2 uses) split between 2 to 4 units, new publicly accessible public realm (including Pocket Park), new publicly accessible Electric Vehicle Charging Hub and Car Club and associate works".

Members of Crawley Borough Council Planning Committee resolved to grant full planning permission for the proposed development at planning committee on the 17th December 2019.

The proposed development will deliver new residential development within a key town centre location, now identified as one of the Town Centre Key Opportunity Sites in the Draft Local Plan. The development will align with the wider regeneration scheme along Station Way and will assist in the creation of a new gateway to the Town. Rainier has a strong track record of delivery and the redevelopment of the site will deliver 152 residential dwellings early on in the plan period and therefore will assist with the wider delivery aspirations of the New Local Plan.

These representations supplement the representations submitted on behalf of Rainier to the Regulation 18 Consultation dated September 2019, attached to this letter. We set out below Rainier's response to the Draft Local Plan, taking each section and policy in turn.

Review

Rainier reiterate our comments to the Regulation 18 consultation in so far as we welcome the commitment to review the plan in 2015, five years after adoption in 2020. We also consider that a new policy should be included in the Draft Local Plan to formalise the period of the review and identify any triggers that may require an early review of the Plan.

Crawley 2035: A Vision

Rainier continue to endorse the vision for the Plan as set out in our Regulation 18 representations.

Strategic Policy SD2: Enabling Healthy Lifestyles and Wellbeing

Rainier's comments regarding enabling healthy physical and mental lifestyles in response to the Regulation 18 consultation remain relevant.

Strategic Policy CL5: Form of New Development – Layout, Scale and Appearance

Strategic Policy CL5 is a revised version to Strategic Policy CD4(b) of the Regulation 18 version Draft Local Plan. Rainier welcome removal of the upper limit for high density development in favour of defining high density development as a 'minimum' of 200 dwellings per hectare.

Rainier also support the removal of identifying a limit to the storey height of new development which is controlled by other policies in the Local Plan.

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

Strategic Policy DD3 is a revision to Strategic Policy CD11 of the Regulation 18 Draft Local Plan. Rainier reiterate our support that all new dwellings should be delivered in accordance with National Space Standards. We note Policy DD3 'encourages' new high-density residential developments in excess of 80 units to achieve higher standards. Rainier are concerned that this may not make most efficient use of deliverable land, particularly in constrained town centre sites.

Strategic Policy DD4: Tree and Landscape Character Planting

Rainier are generally supportive of the Strategic Policy DD4 (revision of Strategic Policy LC3 of the Regulation 18 Draft Local Plan) which seeks to enhance the built form through provision of new tree planting or equivalent soft landscaping.

The policy seeks one new tree or 'equivalent soft landscaping' for each new dwelling. The equivalent soft landscaping to one new tree is not defined. We suggest this is quantified.

Strategic Policy DD5: Tree Replacement Standards

We agreed that mitigating the loss of trees is important however, the number of replacement trees required by Strategic Policy DD5 (and formerly by Strategic Policy LC4 of the Regulation 18 Draft Local Plan) does not have full regard to the girth or maturity of the proposed replacement trees.

As currently worded neither Strategic Policy DD4 nor DD5 consider the viability implications associated with the proposed commuted sum for the cost of new and replacement tree planting which should be considered alongside other Section 106 contributions.

Strategic Policy TC3: Development Sites within the Town Centre Boundary

Rainier support the identification of MOKA at Strategic Policy TC3 as one of the Key Opportunity Sites within the Town Centre Boundary to enhance the town centre vitality and viability in a sustainable location through mixed-use development that meets the economic and social needs of the borough.

Strategic Policy H2: Key Housing Sites

Rainier support the identification of MOKA at Strategic Policy H2 as a key housing site and allocated on the Local Plan Map. MOKA is identified as a deliverable Town Centre Key Opportunity Site. We confirm that MOKA, which benefits from a resolution to grant planning permission as stated above, is deliverable and new housing will be delivered early in the plan period.

Strategic Policy H3c: Town Centre Sites

Rainier support the principle of Strategic Policy H3c: Town Centre Sites however, as currently drafted we are concerned it could overburden new development which may not be able to meet all of the criteria listed at items i to viii. We suggest that this policy should include flexibility to ensure that it is able to balance the intentions of the policy against the benefits of proposed new town centre development. This could be achieved by requiring proposals to 'generally' meet or meet the 'majority of' the criteria listed.

Strategic Policy H4: Future Housing Mix

Rainier welcome the flexibility included in Strategic Policy H4 which recognises the flexibility required when assessing an appropriate housing mix for a development, providing the ability to deviate from the 'starting point' mix provided in the table at paragraph 13.14. In considering an appropriate housing mix it is important that a development scheme is able to respond to its location and market demand.

The MOKA site, which is in a town centre location, immediately adjacent to Crawley Train Station and Bus Station will have a much different mix to a low-rise housing development on the edge of the town centre. The imposition of a rigid housing mix could impact on the viability and deliverability of residential development.

Strategic Policy H5: Affordable Housing

Rainier welcome the exceptions at Strategic Policy H5 which allow the council to consider relaxing the affordable housing requirement, in part or in full, subject to viability.

We query the interpretation of paragraph 64 of the Framework at paragraph 13.31 of the Draft Local Plan and, for avoidance of doubt, we suggest that clarification is provided regarding this matter. We do not consider that paragraph 64 of the Framework means that every residential development must include 10% of its units as affordable home ownership units. This would be a misunderstanding. This would fail to take into account of the footnote accompanying paragraph 64, which confirms that the 10% figure is to be seen "as part of the overall affordable housing contribution from a site"; and the fact that affordable housing policy has to have regard to the viability of a scheme.

Strategic Policy SDC1: Sustainable Design and Construction

Rainier are concerned that the intentions of Strategic Policy SDC1 are unnecessary and a duplication of building regulations. It is considered that this policy should be refocused and seek to achieve carbon reductions and sustainable design in a more flexible way without adding onerous requirements to new development.

Strategic Policy ST2: Car and Cycle Parking Standards

Strategic Policy ST2 of the Local Plan requires car parking standards for residential development to be based on the accessibility of the area, levels of car ownership, and the size of any new dwellings. The version of Strategic Policy ST2 in the Regulation 18 Draft Local Plan recognises that a level of car parking provision that falls below the required standards may be acceptable in central, highly accessible locations, where comprehensive car parking controls are in place and where travel plan measures targeted at reducing car ownership are provided. Such locations would include centrally located, highly accessible sites such as MOKA. This flexibility has been omitted from Strategic Policy ST2 of the Draft Local Plan; we recommend this deleted text is reinstated.

By having a flexible approach to the application of car and cycle parking provision, the Council will be able to encourage the use of active and sustainable modes of transport in place of the private car. This will assist in the Council's wider vision of protecting the environment and becoming a carbon neutral town.

Rainier welcomes the opportunity to engage with the Crawley Local Plan 2020-2035. These representations have been prepared with a focus on our land interests at land south of Station Way, MOKA, Crawley, which is currently subject to a planning application for 152 dwellings and has the benefit of a resolution to grant planning permission by Crawley Borough Council Planning Committee.

Rainier welcome the identification of MOKA for residential development at Strategic Policy TC3: Development Sites within the Town Centre Boundary and Strategic Policy H2: Key Housing Sites. We confirm the Site is deliverable early on in the plan period of the new Local Plan.

We trust you find these representations helpful. Please contact us if you require any further information or clarification of the above.

Yours sincerely,

Gavin Gallagher
Planning Director
Rainier Developments Limited

Representations to Draft Crawley Borough Local Plan 2020 - 2035

On behalf of Rainier Developments Limited

September 2019

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Contact

Ian Deverell
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16 Sep 2019

1. Introduction

- 1.1 These representations have been prepared by Turley, on behalf of Rainier Developments Limited ('Rainier'), in response to the Draft Crawley Borough Local Plan 2020 – 2035 (July 2019). This representation relates to land to the south of Station Way (also referred to as 'MOKA'), Crawley, which is currently subject to a full planning application (CR/2019/0542/FUL) with the following description of development:

“Demolition of existing nightclub and redevelopment of site providing 152 apartments, Ground Floor Commercial / Retail space (Class A1, A3, A4, B1 and/or D2 uses) split between 2 to 4 units, new publicly accessible public realm (including Pocket Park), new publicly accessible Electric Vehicle Charging Hub and Car Club and associate works”.

- 1.2 A location plan is enclosed at **Appendix 1**.
- 1.3 The proposed development seeks to deliver new residential development within a key town centre location, which will align with the wider regeneration scheme along Station Way, and will assist in the creation of a new gateway to the Town. Rainier has a strong track record of delivery and the redevelopment of the site will deliver 152 residential dwellings early on in the plan period and therefore will assist with the wider delivery aspirations of the New Local Plan.
- 1.4 These representations have regard to the national and local policy context, and are framed in the context of the requirements of Local Plans to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF) (2019), paragraph 35. For a development plan to be sound it must be:
- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

2. Representations

- 2.1 This section sets out Rainier’s response to the Draft Crawley Borough Local Plan 2020 – 2035, taking each section and policy in turn.

Review

- 2.2 Rainier welcome the Draft Local Plan’s commitment to a review of the plan in 2025, five years after the anticipated adoption of the Plan in 2020, in order to ensure that the Plan remains up-to-date and consistent with national policy and ultimately the legal requirement for all local plans to be reviewed at least every five years. This is also necessary given the significant level of unmet need from the wider Northern West Sussex Housing Market Area. In undertaking regular monitoring and review, it will be possible to identify any shortcomings in the Plan and identify any delay in the delivery of strategic housing allocations.
- 2.3 While it is recognised that all local plans should be reviewed at least every five years in accordance with the NPPF (footnote 18), Rainier consider that a new policy should be included within the Draft Local Plan. Such a policy would formalise the period for review and identify any relevant triggers which would require an early review of the Plan (i.e. the level of unmet housing need is not being met within the wider Northern West Sussex Housing Market Area).

Crawley 2035: A Vision

- 2.4 Rainier welcome the strategic vision for the Plan, in particular its focus on wellbeing, creating stronger communities, delivering the Borough’s housing needs and working towards becoming a carbon neutral Town.
- 2.5 Rainier’s proposals for Station Way will contribute to meeting Crawley’s housing needs in a central location within the Town Centre, complementing the emerging Station Gatewayscheme, and will therefore be consistent with this vision. The site is in a central location, in close proximity to Crawley Train and Bus Stations, so is inherently sustainable and promotes walking, cycling and the use of public transport, with excellent connections within and beyond the region. Recognising this, the proposals therefore include limited car parking spaces. Of the spaces provided, five will be operated as an electronic vehicle (EV) car club, with all other spaces providing EV charging points available to all Crawley residents and visitors. It is therefore considered that the proposed development will deliver much needed housing within a highly sustainable location, promoting the use of active and sustainable transport, aligning with the Council’s vision of protecting the environment and making significant progress towards Crawley becoming a carbon neutral town.
- 2.6 It will also deliver significant benefits for the wider community through the provision of a high quality pocket park, contributing to the wider public realm improvements planned as part of the Station Gateway proposals.

Policy SD2: Enabling Healthy Lifestyles and Wellbeing

- 2.7 Rainier agree in principle with this proposed policy and its intention to facilitate and control development to promote healthy physical and mental lifestyles. NPPF paragraph 96 recognises that access to high quality open spaces can make an important contribution to the health and well-being of communities, the proposed high quality pocket park on the MOKA site will therefore make a significant contribution to achieving healthy lifestyles. The proposals also promote this through the provision of private amenity space, (including a roof garden). The commercial space at ground floor level has been designed to include co-working space. Such facilities will increase opportunities for the social interaction of residents as well and aligning with the wider range of improvements to the public realm and pedestrian infrastructure associated with the Station Gateway scheme.
- 2.8 As currently drafted the policy states that “new development **must** be designed to achieve healthy, inclusive and safe places”. NPPF paragraph 11 seeks for Local Plans to be flexible in order to respond to rapid change. On this basis we recommend the policy is reworded as follows to ensure the plan is able to respond to rapid change:

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

Policies CD1 – CD6, CD10 and H3

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

design led approach which seeks to assist in the creation of a vibrant mixed use area . It will assist in the creation of a new gateway and contribute to the ongoing urban regeneration of this part of Crawley. It represents the reuse of previously development land which is currently underused and in a declining state and will deliver a range of significant benefits, including a public pocket park, 152 new homes, and the provision of electric vehicle charging points and car club facilities.

- 2.13 The proposed development responds to and reflects its immediate and wider environs, drawing on the New Town vernacular with the innovative use of materials and design aesthetics.
- 2.14 At ground floor level, the two sides of the square will provide new commercial / retail units, with the aim of creating a lively, active frontage to the new green space / public square and Station Way, whilst providing high quality residential apartments above.

CD4(b): Effective use of Land: Layout, Scale , Appearance and Public Realm

- 2.15 Rainier welcome the minimum density ranges identified within the policy, as this will drive the delivery of higher density development where it is needed centrally within the town and assist in the much needed deliver of new homes. However, Rainier are concerned that identifying an upper figure in the high density category could artificially suppress the level of new homes which can be delivered at a given site, particularly in highly sustainable locations in close proximity to key transport nodes such as Crawley train and bus stations.
- 2.16 It is also considered that identifying a 10 storey limit to new development is not necessary. Height will be controlled by the requirements of other policies such as Aerodrome Safeguarding (CD7) and the ranges of policies within the 'Character and Design' section of this plan, particularly those which seek for new development to reflect that which surrounds it. Rainier consider that the maximum height of a building should be guided by the wider policies within the Local Plan.

CD11: Standards for all new dwellings

- 2.17 Rainier agree that all new dwellings should be delivered in accordance with National Space Standards to create comfortable and sustainable living conditions. The proposed development has been designed in full compliance with these to create a high quality development which contributes to the unique character and identity of the town.
- 2.18 Notwithstanding this, the second part of this policy goes on to promote higher space standard requirements than necessary. Rainier are concerned that this will not be the most efficient use of space for deliverable land particularly given the level of unmet housing need in Crawley.

Policies LC1 – LC2

- 2.19 Rainier support policies LC1 to LC4 in their approach to contribute to character, appearance and identity of Crawley. Such an approach is consistent with the overall approach to delivering high quality design within the wider Local Plan and expressed in national policy.

- 2.20 The proposed development seeks to provide a ‘common relationship’ in massing and footprint to the buildings in the adjacent surroundings and is similar in character and form to the recently approved scheme along Station Way. It is considered that when viewed in the long range view, the proposed development will not be discernible from the wider built form within Crawley Town Centre, particularly given that careful attention has been paid through the design and pre-application process to ensure that the proposed development is seen as part of the wider redevelopment along Station Way.
- 2.21 Furthermore, through the design process careful attention has been paid to the existing arboricultural life on site, and the proposed development incorporates an increase in the overall amount of trees and accessible green space within the site.

Policies LC3 and LC4

- 2.22 While Rainier are supportive of the overall approach taken to enhancing built form through the provision of new tree planting, it is considered that the approach and standards set out within policies LC3 and LC4 are not sufficiently flexible to account for other landscape opportunities within a scheme.
- 2.23 The proposed development will provide a new ‘pocket park’ and while it will include some new tree planting, it will also deliver a range of other new planting of varying sizes, including grass, shrubs, flowers etc.. The pocket park will also include seating and space for socialising at a natural place of convergence along Station Way. It is considered that the provision of a pocket park in this location will enhance the physical and social landscape far beyond what the planting of only trees could achieve within the same space. However, the wording of policies LC3 and LC4 should be more flexible to take this into account.
- 2.24 We agree that mitigation for the loss of trees is important however the number of replacement trees required by policy LC4 does not have full regard to the girth or maturity of the proposed replacement trees or the space within a site to provide replacement trees. In a sustainable town centre location (where the Council should be making most efficient use of developable land) the requirement to provide 8 replacement trees to mitigate the loss of 1 tree with a girth of 80 cm will require a significant area of land. There should be greater flexibility to the application of this policy, which would have regard to the girth and maturity of the replacement trees.
- 2.25 Furthermore as currently worded these policies do not consider the viability implication associated with the proposed commuted sum for the cost of new and replacement tree planting which should be considered alongside other Section 106 contributions.

Policies OS1 – OS3

- 2.26 Rainier support the intentions of policies OS1 – OS3 relating to Open Space, Sport and Recreation and consider that these policies will assist in the promotion of mental and physical health wellbeing through increased choice and access to such facilities.

- 2.27 Central to the proposed development is an ambition to create a new public destination through the provision of the pocket park and flexible employment / retail space, as well as incorporating the existing mature trees with the emerging public realm proposals. The public realm improvements will be developed in close collaboration with West Sussex County Council to ensure that the proposed design further enhances the emerging plans for the Station Gateway proposals. These facilities will provide a natural open space within an urban area which will provide a space for residents of the proposed development as well as members of the public to meet and interact with one another.

Policy TC2: Town Centre Neighbourhood Facilities

- 2.28 The principle of this policy to support applications for new facilities and services within Crawley Town Centre to ensure the needs of its growing residential population is supported. The policy however should be worded more clearly to reflect that the policy is to be applied to applications for new facilities only and that it is not seeking applications for residential development in the Town Centre to deliver the services and facilities listed within the policy on site.
- 2.29 Whilst not required by this policy, the proposed development will deliver a range of 'neighbourhood facilities', including the pocket park which will provide open space within an area which is currently lacking such facilities, together with a range of flexible commercial spaces which can be used for a range of use classes able to meet changing commercial needs in the district.

Policy TC3: Development Sites within the Town Centre Boundary and TC4: Active and Engaging Frontages

- 2.30 Rainier support the Council's recognition that sites within the Town Centre provide an opportunity to deliver mixed use development and the opportunities this provides in the creation of sustainable, balanced neighbourhoods whilst enhancing the vitality and viability of the town centre through increased footfall and activity.
- 2.31 The proposed development has been designed to correspond with the wider regeneration works associated with the 'Crawley Station and Car Parks' site specifically allocated within Policy TC3.
- 2.32 To complement with the Station Gateway scheme, the proposed development will form a continuation of active frontages along Station Way improving the legibility, and rhythm of buildings as well as assisting with the sense of security through natural surveillance provided by the proposed development. It is also considered that the new pocket park will create a natural place of convergence and punctuation along a linear road, which will again assist with place making and the formation of active frontages.
- 2.33 This will ensure the proposals create a strong sense of place and an attractive and distinctive place to live.

Policy H1: Housing Provision

- 2.34 Given the level of constraint to the growth of Crawley Borough Policy H1 identifies a significant level of unmet housing need (approximately 6,475 dwellings) which will be met within neighbouring authorities, such as those within the Northern West Sussex Housing Market Area. While it is appreciated that the level of unmet need cannot be met within the Borough, Rainier welcomes the provisions within Policy H1 to consider all reasonable opportunities to meet housing needs, including brownfield sites such as our client's site within Crawley Town Centre. This reflects the NPPF, in particular paragraphs 117 and 138 which require plans to make as much use as possible of previously developed land, especially where it is well served by public transport.

Policy H2: Key Housing Sites

- 2.35 As set out throughout these representations, the proposed development aligns with the emerging re-development of a key town centre opportunity site, Crawley Station and Car Parks – ('Station Gateway'). While not allocated as part of the Town Centre opportunity site, the proposals represent a residential led, mixed use development which is deliverable within the early years of the plan, bolstering the Council's supply early on, when some of the larger strategic allocations might not be able to so.

Policy H3d: Housing Typologies: Town Centre Residential Sites

- 2.36 Whilst Rainier support this policy in principle, it is considered that as currently drafted the policy could potentially over burden new development and be unable to fully consider the benefits of a proposed scheme. This is particularly relevant given that the level of unmet housing need which is being met within the wider Northern West Sussex Housing Market Area.
- 2.37 Rainier consider that the policy should include added flexibility to ensure that it is able to balance the intentions of the policy against the benefits of a proposed development. This could potentially be achieved by requiring proposals to 'generally' meet or meet the 'majority of' the criteria listed.

Policy H4: Future Housing Mix

- 2.38 Rainier are encouraged that Policy H4 recognises the flexibility required when assessing an appropriate housing mix for a development, with the ability for it to deviate away from the 'starting position' as set out within the table at paragraph 12.84. In the formation of an appropriate housing mix, it is important that a development scheme is able to respond to its locality and market demand.
- 2.39 For example Rainier's proposals for the MOKA site are in close proximity to Crawley Train Station providing efficient local and national services as well as being a town centre location will have a much different housing mix requirement to a low rise housing development on the edge of the town centre. Clearly the imposition of a rigid housing mix could impact upon the viability and deliverability of a residential development.

Policy H5: Affordable Housing

- 2.40 It is welcomed that the policy allows for a relaxation of the affordable housing guidelines should the policy compliant level impact upon the viability of development. This provides suitable flexibility within the policy to allow sites with elements of constraint to development, such as previously developed land, to be re-developed having regard to the viability of the scheme.

Policy SDC1: Sustainable Design and Construction

- 2.41 The NPPF (Section 14) recognises that planning and local plans should take a proactive approach to mitigating and adapting to climate change and it is welcomed to see that the New Local Plan for Crawley Borough has sought to tackle this through the inclusion of an entire section on 'Sustainable Design and Construction'. However, Rainier are concerned that the intentions of Policy SDC1 are unnecessary and a duplication of building regulations. Instead it is considered that this policy should be refocused and seek to achieve carbon reductions and sustainable design in a more flexible way without adding onerous requirements to new development.
- 2.42 The recently adopted Harborough Local Plan (2011 – 2031) adopted in April 2019, included a policy 'Mitigating Climate Change' which sought to achieve similar outcomes as Policy SDC1, but in a much more flexible way. We have included the wording of that Policy below:

1. Major development will be permitted where it demonstrates:

- (a) how carbon emissions would be minimised through passive design measures;*
- (b) the extent to which it meets relevant best practice accreditation schemes to promote the improvement in environmental and energy efficiency performance;*
- (c) how the development would provide and utilise renewable energy technology;*
- (d) whether the building(s) would require cooling, and if so how this would be delivered without increasing carbon emissions;*
- (e) how existing buildings to be retained as part of the development are to be made more energy efficient;*
- (f) how demolition of existing buildings is justified in terms of optimisation of resources in comparison to their retention and re-use; and*
- (g) how carbon emissions during construction will be minimised.*

2. In Strategic Development Areas applicants should demonstrate whether a decentralised energy network is viable and, if so, the arrangements for its delivery and future management

- 2.43 Rainier would consider the wording of Policy SDC1 should be revised to take a similarly flexible approach to mitigating climate change as was taken in the recently adopted Harborough District Local Plan.

Policy ST2: Car and Cycle Parking Standards

- 2.44 It is welcomed that Policy ST2 allows decision makers to recognise the accessibility / sustainability of sites which are located in highly sustainable locations and accordingly relaxes the need to provide policy compliant car parking provision. Such locations where this is appropriate are those which are centrally located, in highly accessible locations such as the proposed development site. By having a flexible approach to the application of car and cycle parking provision, the Council will be able to encourage the use of active and sustainable modes of transport in place of the private car and assist in the Council's wider vision of protecting the environment and becoming a carbon neutral town.
- 2.45 In recognition of its highly sustainable location the proposed development provides 16 car parking spaces (inclusive of two disabled spaces), all of which are equipped for the charging of electric vehicles. Of the spaces provided, five will be operated as an electronic vehicle car club and available to all Crawley residents and visitors. In addition and in promotion of active travel, 183 bicycle spaces will be provided within the development and it is considered that this approach will enable local residents to fulfil their everyday travel needs by bus, train, cycling with more infrequent journeys requiring the use of one of the car club vehicles. These steps will allow the proposed development to greatly assist in both meeting a significant proportion of the housing need, as well as meeting the Council's vision for Crawley to become a Carbon Neutral town.

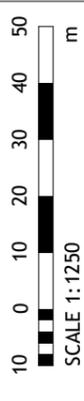
3. Summary

- 3.1 Rainier welcomes the opportunity to engage with the Crawley Local Plan 2020-2035. It provides the opportunity to review the Borough's own needs and ensure its spatial strategy remains up to date and its development management policies reflect the most up to date NPPF and current market signals.
- 3.2 These representations have been prepared in relation to land to the south of Station Way (also referred to as 'MOKA'), Crawley, which is currently subject to a full planning application (CR/2019/0542/FUL). The proposed development seeks to deliver new residential development within a key town centre location, which will align with the wider regeneration scheme along Station Way, and will assist in the creation of a new gateway to the Town. Rainier has a strong track record of delivery and the redevelopment of the site will deliver 152 residential dwellings early on in the plan period and therefore will assist with the wider delivery aspirations of the New Local Plan.
- 3.3 We trust the information provided within these representations will be considered.

Appendix 1: Site Location Plan

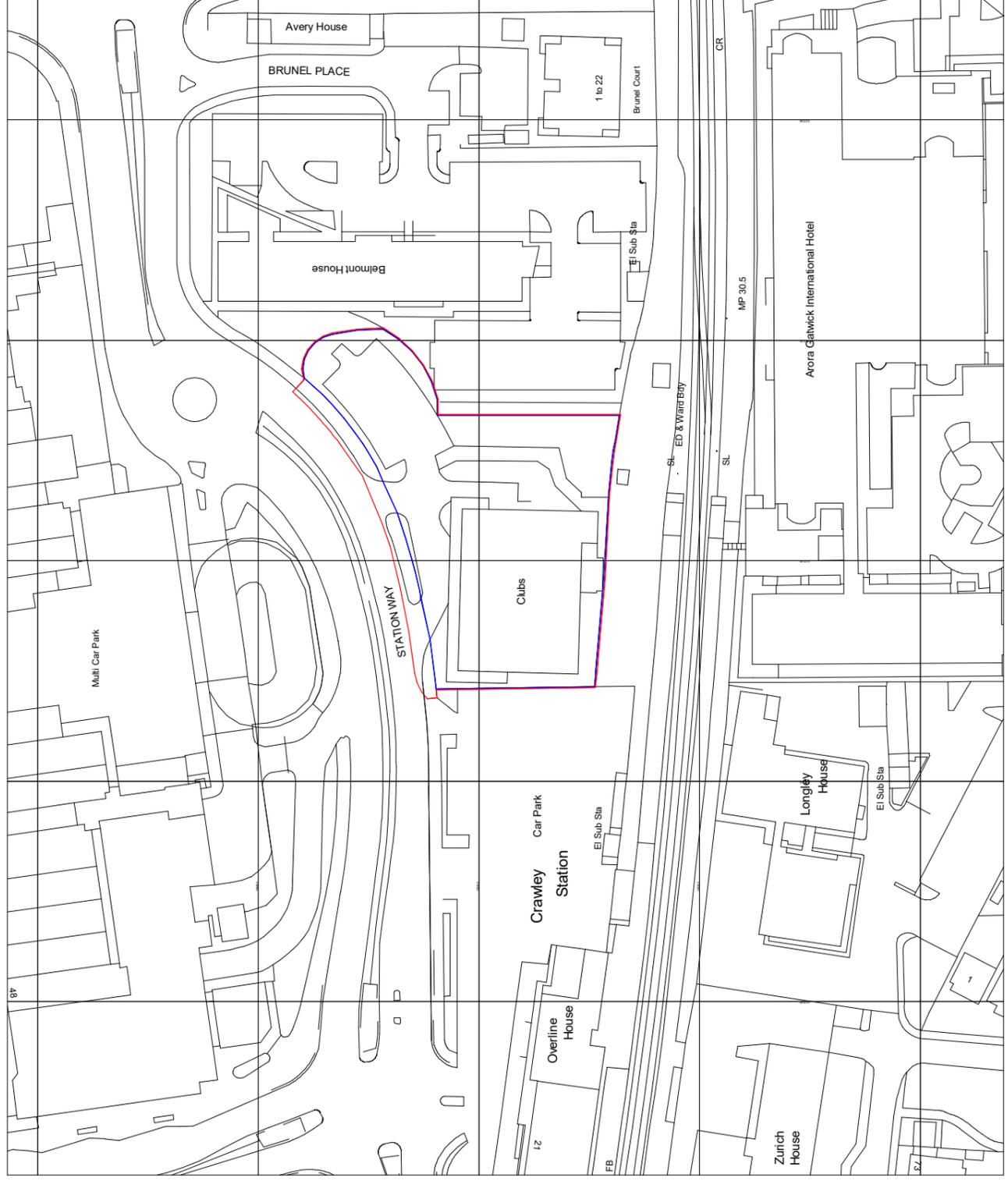
Notes
Contractors must verify all dimensions on site before commencing any work on this drawing. Do not scale from this drawing.
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KEY

- Planning Application Boundary
- Site Ownership Boundary



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Revision	Issued for Planning	Approved	Date
L.P	M.B	M.L	M.L
59833	FEB 2019	1: 1250 @ A3	
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Project
MOKA, CRAWLEY

Drawing Title
SITE LOCATION PLAN

ARCHITECTURE

Project Code: MCB - XX - SI - DR - A - 0100
Drawing: D5 - P4
Project Name: MOKA, CRAWLEY
Project Number: 100022432

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