



Crawley 2035

Ref No:

Office use only

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.

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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:	Ms
First name:	Kate
Surname:	Matthews
Organisation:	Firstplan
Address line 1: Crawley Goods Yard	Bramah House

Address line 2:	Gatwick Road	65-71 Bermondsey Street
Town/city:	Crawley	LONDON
Postcode:	RH10 9RE	SE1 3XF
Telephone:	07739937387	07739937387
Email:	kmatthews@firstplan.co.uk	kmatthews@firstplan.co.uk

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?

Paragraph: Policy: Other:

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

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

Our clients jointly operate Crawley Goods Yard - an established rail fed aggregates depot and safeguarded railhead. The goods yard has the capacity to handle a million tonnes of aggregate a year with the potential for expansion in the future. The site supports additional key minerals infrastructure and related development including two concrete batching plants, an asphalt plant and construction and demolition waste recycling plant.

The operators of the Goods Yard were fully involved in the last Local Plan process which led to specific wording in the adopted version of Policy H2 regarding the Tinsley Lane site. This requires that development on this site must be “planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent safeguarded minerals site”.

The operators were subsequently also involved in providing comments in response to

consultation undertaken in the preparation of the Tinsley Lane Development Brief (Adopted April 2017). This now includes at Section 7 guidance on Noise.

In respect of Draft Strategic Policy H2, it is noted that the designation of the Tinsley Lane site has the same wording as the current Local Plan except for reference to the adopted development brief. It is also noted that draft Paragraph 12.40 is the same as adopted Paragraph 6.53. The Crawley Goods Yard operators support the previously approved wording in both Policy H2 and draft Paragraph 12.40 which requires that development must be carefully planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent minerals site. This wording was found sound by the previous Inspector and continues to be supported by National and County level policy.

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.**

None subject to the draft wording remaining the same.

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.

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Signature

Ms. Kate Matthews of Firstplan
complete on

Date

27/02/2020



Crawley 2035

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Title:		Ms
First name:		Kate
Surname:		Matthews
Organisation:	Aggregate Industries UK Ltd, Cemex UK Operations Ltd, Day Group Ltd and Brett Group	Firstplan

Address line 1:	Aggregate Industries Uk Ltd	65-71 Bermondsey Street
Address line 2:	Crawley Goods Yard, Gatwick Road	
Town/city:	Crawley	LONDON
Postcode:	RH10 9RE	SE1 3XF
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- 5.1. Legally compliant? Yes No
- 5.2. Sound? Yes No
- 5.3. Compliant with the duty to co-operate? Yes No

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

Our clients jointly operate Crawley Goods Yard - an established rail fed aggregates depot and safeguarded railhead. The goods yard has the capacity to handle a million tonnes of aggregate a year with the potential for expansion in the future. The site supports additional key minerals infrastructure and related development including two concrete batching plants, an asphalt plant and construction and demolition waste recycling plant.

Draft Strategic Policy EC10 concerns 'Employment Development and Residential Amenity'. We note that this has similarities to adopted Policy EC4 but with reworded and additional text referring to the 'agent of change' principle and confirming that residential development within the Main Employment Areas, except the town centre, will not be supported. It also confirms that where residential or amenity sensitive development is proposed adjacent to the

employment areas, the proposed uses must be designed to mitigate any impact from the existing or future employment use on the new residents. This approach is supported by the NPPF which establishes the 'agent of change' principle and should be found sound.

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None provided draft wording remains the same

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

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Signature

Ms. Kate Matthews of Firstplan

Date

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First name:	<input style="width: 100%;" type="text"/>		Kate
Surname:	<input style="width: 100%;" type="text"/>		Matthews
Organisation:	Aggregate Industries UK Ltd (AI), Cemex UK Operations Ltd (Cemex), Day Group Ltd (Days) and Brett Group		Firstplan

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Our clients (Aggregate Industries UK Ltd (AI), Cemex UK Operations Ltd (Cemex), Day Group Ltd (Days) and Brett Group) jointly operate Crawley Goods Yard - an established rail fed aggregates depot and safeguarded railhead. The goods yard has the capacity to handle a million tonnes of aggregate a year with the potential for expansion in the future. The site supports additional key minerals infrastructure and related development including two concrete batching plants, an asphalt plant and construction and demolition waste recycling plant.

Crawley Goods Yard is illustrated on the draft Proposals Map as a 'Safeguarded Railhead' with reference made to the WSCC & SDNPA Joint Minerals Local Plan 2018 within the legend.

This approach is strongly supported as it signposts people accessing the Local Plan to this important designation within the Joint Minerals Local Plan and therefore raises awareness of the need to take our clients' site into account. This approach was taken in the adopted Proposals Map and found sound by the previous Inspector.

It is noted that the 250m buffer surrounding the safeguarded railhead site has been added to the submission version of the Local Plan Map. This is also very much welcomed by the Goods Yard Operators as it makes the need to take account of our clients' site even clearer. The protection of the Crawley Goods yard is supported by the NPPF and joint minerals local plan and therefore the approach taken by the Council should be found sound.

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

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None subject to site being shown on Proposals Map as currently drafted.

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Signature

Ms Kate Matthews of Firstplan
completed online

Date

27/02/2020

Our Ref: 11000/vw/km
Your Ref: n/a
Email: kmatthews@firstplan.co.uk
Date: 27 February 2020

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

By email only

Dear Sir/Madam,

RESPONSE ON BEHALF OF CRAWLEY GOODS YARD OPERATORS
DRAFT CRAWLEY 2035 LOCAL PLAN SUBMISSION CONSULTATION DRAFT

Firstplan are instructed by Aggregate Industries UK Ltd (AI), Cemex UK Operations Ltd (Cemex), Day Group Ltd (Days) and Brett Group to provide the following response to the submission consultation draft of the Crawley Borough Local Plan 2020 – 2035.

Relevant Background Information

As the Borough Council are fully aware, our clients jointly operate Crawley Goods Yard - an established rail fed aggregates depot and safeguarded railhead. The goods yard has the capacity to handle a million tonnes of aggregate a year with the potential for expansion in the future. The site supports additional key minerals infrastructure and related development including two concrete batching plants, an asphalt plant and construction and demolition waste recycling plant.

The operators of the Goods Yard were fully involved in the last Local Plan process which led to specific wording in the adopted version of Policy H2 regarding the Tinsley Lane site. This requires that development on this site must be *“planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent safeguarded minerals site”*.

The operators were subsequently also involved in providing comments in response to consultation undertaken in the preparation of the Tinsley Lane Development Brief (Adopted April 2017). This now includes at Section 7 guidance on Noise.

Comments on the Draft Plan

Crawley Goods Yard is illustrated on the draft Proposals Map as a ‘Safeguarded Railhead’ with reference made to the WSCC & SDNPA Joint Minerals Local Plan 2018 within the legend. This approach is strongly supported as it signposts people accessing the Local Plan to this important designation within the Joint Minerals Local Plan and therefore raises awareness of the need to take our clients’ site into account. This approach was taken in the adopted Proposals Map and found sound by the previous Inspector.

It is noted that the 250m buffer surrounding the safeguarded railhead site has been added to the submission version of the Local Plan Map. This is also very much welcomed by the Goods Yard Operators as it makes the need to take account of our clients' site even clearer. The protection of the Crawley Goods yard is supported by the NPPF and joint minerals local plan and therefore the approach taken by the Council should be found sound.

Crawley Goods Yard is also part of the Manor Royal Employment Area and therefore draft Policies EC1, EC2 and EC3 are relevant. These draft policies seek to protect the employment area for employment uses and encourage intensification of underutilised sites. The Goods Yard operators are generally supportive of these policies and have no detailed comments on them.

Draft Strategic Policy EC10 concerns '*Employment Development and Residential Amenity*'. We note that this has similarities to adopted Policy EC4 but with reworded and additional text referring to the 'agent of change' principle and confirming that residential development within the Main Employment Areas, except the town centre, will not be supported. It also confirms that where residential or amenity sensitive development is proposed adjacent to the employment areas, the proposed uses must be designed to mitigate any impact from the existing or future employment use on the new residents. This approach is supported by the NPPF which establishes the 'agent of change' principle and should be found sound.

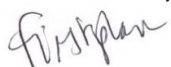
In respect of Draft Strategic Policy H2, it is noted that the designation of the Tinsley Lane site has the same wording as the current Local Plan except for reference to the adopted development brief. It is also noted that draft Paragraph 12.40 is the same as adopted Paragraph 6.53. The Crawley Goods Yard operators support the previously approved wording in both Policy H2 and draft Paragraph 12.40 which requires that development must be carefully planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent minerals site. This wording was found sound by the previous Inspector and continues to be supported by National and County level policy.

In conclusion, the Goods Yard operators support the recognition of their site as a Safeguarded Railhead on the draft Proposals Map and the identification of the buffer zone. They also support the draft wording of Policies EC10 and H2 which require new residential development to be designed to mitigate any impact from the employment use on new residents, and specifically requires the Tinsley Lane site to take into account the Crawley Goods Yard.

The current drafting of the plan is therefore considered to be sound. However, if these policies or the Local Plan Map are altered during the course of the examination in public, then our clients wish to reserve the right to make further representations.

We trust you will take our comments into account, and please keep us apprised of any further consultations on the new Local Plan.

Yours faithfully



KATE MATTHEWS
Director

cc.	Jo Baker	-	Aggregate Industries UK Ltd
	Andy Scott	-	Cemex UK Operations Ltd
	Phil Aust	-	Day Group
	Richard Ford	-	Brett Group