



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.

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	Mr
First name:	Ken	Tom
Surname:	Glendenning	Cole
Organisation:	Homes England	Montagu Evans
Address line 1:		5 Bolton Street

Address line 2:

Town/city:

Postcode:

Telephone:

Email:

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 type="checkbox"/> | No <input checked="" 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.

Refer to representations dated 2 March 2020.

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:

Refer to representations dated 2 March 2020.

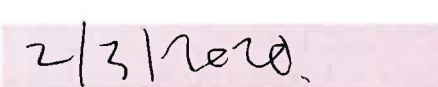
The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

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



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.**

Refer to representations dated 2 March 2020.

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



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

2nd March 2020

Dear Sir / Madam,

CRAWLEY BOROUGH COUNCIL LOCAL PLAN REVIEW REGULATION 19

Please find enclosed Homes England's representations to Crawley Borough Council's Local Plan Review 2020 – 2035 (Regulation 19).

These representations relate to the promotion of Rowley Farm (the "Site") for employment uses across the various B Class uses. Homes England has engaged with previous plan-making stages, in responding to the Call for Sites and Regulation 18 consultation exercises. The representations are set out against the draft policies presented within the Draft Crawley Borough Local Plan 2020 – 2035 consultation version dated January 2020.

Rowley Farm is designated as Gatwick Airport Safeguarding land under the current Local Plan, however the Plan explains that the Council are proposing to remove the safeguarding policy through the Local Plan Review and to allocate the land to meet development needs through a future Area Action Plan (AAP). Homes England note and support this strategy. These representations are made on the basis that the safeguarding designation is withdrawn.

Context

Homes England are an executive non-departmental public body, sponsored by the Ministry of Housing, Communities and Local Government. Homes England has the aspiration, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, Homes England are assisting in the delivery of the new homes England needs and is helping to improve neighbourhoods and grow communities. Homes England works in collaboration with partners who share our ambition. These include local authorities, private developers, housing associations, lenders and infrastructure providers.

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#MakingHomesHappen

Within the next few years, Homes England will have invested over £27 billion across our programmes.

Homes England's mission is to ensure more homes are built in areas of greatest need, to improve affordability.

Homes England has a strong track record in acting as a 'master developer' on schemes such as the Northern Arc in Burgess Hill, Mid Sussex and Northstowe in Cambridgeshire. In the case of Burgess Hill, Homes England acquired the site, which had been identified as a location for major housing delivery for over 10 years but had stalled due to the complexities of land ownership and the need for upfront strategic infrastructure delivery. Homes England worked closely with Mid Sussex District Council, the landowners and the site promoter to acquire the land. At the Northern Arc, Homes England are investing in the required infrastructure to secure early release of the first phases of development. Homes England is deploying our knowledge and delivery expertise to ensure that the scheme comes forward to meet local ambitions.

At West of Ifield, we will take a similar approach as the master developer to accelerate the delivery of key infrastructure to enable housing to be built out quickly. Furthermore, acting as a master developer will enable Homes England to maintain the design standards across the scheme from outset to completion as well as delivering significant social, economic and environmental benefits to the existing neighbourhoods of Crawley.

Rowley Farm offers significant capacity for employment development across a range of B Class uses. This would complement the emerging proposals at West of Ifield by providing substantial employment opportunities for existing residents and the new resident population at West of Ifield. Additionally, strong transport links would come forward through the delivery of the Western Link. This would lead to sustainable patterns of development for the expansion of Crawley, which is explicitly encouraged by national planning policy.

The NPPF (Paragraph 8) outlines that the role of the planning system is to actively manage patterns of growth so that "sufficient land of the right types is available in the right places and at the right time to support growth". This approach is reinforced by wider Government policy, as set out in the UK Industrial Strategy and Clean Growth Strategy, which collectively seek to promote development that boosts economic growth and productivity, whilst transitioning a low carbon future. Development at Rowley Farm and West of Ifield would support these Government priorities.

Land at Rowley Farm

The Site measures 51.05 hectares and comprises part of an agricultural holding known as Rowley Farm. Homes England is the freehold owner of the Site. The Site is located immediately south of Gatwick Airport and abuts the Manor Royal employment area to the east and south. The extent of the Site is outlined in red on the attached plan. It is strategically located relative to the M23 and Gatwick Airport.

There are a number of trees across the Site which are primarily located along field margins. There are two established areas of woodland, Huntsgreen Wood in the north east corner and Rowley Wood in the southwest. Both of these are designated as Ancient Woodland with the latter also a Site of Importance for Nature Conservation.

The Site contains two listed buildings, namely Rowley Farmhouse (Grade II*) and Crown Post Barn (Grade II). All land with the exception of the immediate areas adjacent to Crawter's Brook is within Flood Zone 1.

The Site can be accessed via either London Road to the north or James Watt Way to the south and there is potential to access the site from Gatwick Road.

Strategy Policy SD3: North Crawley Area Action Plan

Gatwick Safeguarding Land

As noted above, the Site is designated under Strategic Policy SD3 of the adopted Local Plan as Gatwick Airport Safeguarding land as part of a strategic parcel of land south, east and west of Gatwick Airport. This land has historically been identified to accommodate a second runway to support the growth of the airport if required. In the Regulation 19 version of the Plan the Site is proposed for de-designation under draft Policy SD3.

In June 2018, the Government voted in favour of expanding Heathrow Airport for a third runway. This is manifest in the Airports National Policy Statement (2018), which explains that Heathrow's expansion was chosen as it is "is considered to deliver the greatest net benefits to the UK" when compared to the Gatwick proposal (Para 3.74). It is within the context of the Government's decision to expand Heathrow Airport that the draft Crawley Local Plan Review seeks to remove the safeguarding under draft Policy SD3

Whilst Homes England has no comment on the principle of safeguarding itself, plainly land cannot be safeguarded in perpetuity by planning policy without evidential basis, and particularly so when current evidence suggests this designation is no longer required. On the basis that the Council considers insufficient evidence exists to justify the continued safeguarding of the land, in full or in part, alongside wider development as part of the future North Crawley AAP, then it is considered that this approach could be considered sound in line with the requirements of the NPPF.

We remind the Council that the NPPF, under Paragraph 104c, requires a robust evidence base to be in place to realise opportunities for large scale development. We recommend that the Council strengthens its evidence base prior to Examination of the Local Plan so that this is demonstrated. This should be achieved through further discussions with Gatwick Airport Limited, but also by developing its assessment of development needs through the Northern West Sussex Economic Growth Assessment (NWSEGA), Employment and Housing Growth Trajectory and Strategic Housing Land Availability Assessment.

It is also understood that the Airport is to submit a DCO to promote an extension to its northern runway. This is set out in the Gatwick Airport Limited masterplan¹. Homes England supports this approach to enable the airport to expand, but this also serves as a strong indicator that the safeguarded land south of London Road can be released for development. The policy approach taken is a logical one in ensuring the Plan is justified.

Preparation of an AAP

Homes England supports the Council's intention to prepare a future AAP, which will enable the Council to set out its vision for how the Site can come for development and allocate strategic sites for employment and other uses. This will balance the expansion needs of the airport alongside wider development needs. This will also provide Gatwick Airport the opportunity to prepare its own evidence of growth needs and future operational requirements.

The future AAP will assess the most appropriate, sustainable locations to accommodate this growth in a comprehensive manner, in ensuring new development is ambitious, appropriate and sustainable. The growth of Manor Royal at Rowley Farm can support the existing employment area, attract major employers and occupiers and help deliver on wider economic objectives.

¹ <https://www.gatwickairport.com/business-community/future-plans/long-term-plans/>

Expanding the well-established employment base at Manor Royal, the Council's most strategically important employment site, will support growth in growing sectors nationally. This will offer a competitive advantage to Manor Royal and enable the Council to realise housing potential by releasing capacity on brownfield land for housing in Crawley town centre and other parts of the Borough which are sustainably located.

The AAP must be developed in partnership between the Council, Homes England and all other landowners within the safeguarded land to ensure that economic and infrastructure growth is delivered in a comprehensive manner.

General Suitability of Rowley Farm

The Rowley Farm site is inherently suitable for a strategic employment development. It is sustainably located adjacent to Manor Royal employment area and would be a logical extension to the business hub. It would be likely to attract substantial market interest by developers were it to come forward following a successful allocation, building on synergies with the airport and wider Gatwick Diamond.

Homes England has completed an initial employment capacity assessment to identify how many jobs could be delivered on the Site in the future. This has been calculated using the Council's own evidence for floorspace and land requirements within the NWSEGA. At this stage, it is envisaged that the development could achieve circa 5,000 jobs based on Homes England's understanding of land use, market demand and the Site's capacity.

This demonstrates that the Site can provide a substantial quantum of employment development as a strategic scale extension to Manor Royal. The direct employment generation is significant, which would also present vast additional numbers of jobs in construction and associated employment. The case for the Site's future allocation and development for employment use is compelling.

Rowley Farm is uniquely located directly adjacent to Manor Royal. The expansion of the Borough's strategic employment site at Rowley Farm would build upon the already well established employment base and would be very attractive for investment and securing occupiers. Development at Rowley Farm would also be able to utilise the utilities and telecommunications infrastructure that is in place at Gatwick Farm, including the established transport links available at Gatwick Airport including its train station. As a result development would be delivered more quickly than at other locations in the Borough.

The Site could also be developed in a phased manner alongside the delivery of the link road promoted under Policy ST4 and proactively support the priority of the Council and that set out within the Draft Local Plan which seeks to build on the success of the existing employment area of Manor Royal.

There are no known, unresolvable constraints to delivery that would prevent the redevelopment of Rowley Farm coming forward. It is acknowledged that the site is leased to an agricultural tenant under the Agricultural Holdings Act 1986. Based on the terms of the lease with the tenant, the landlord has the opportunity to expire the lease at short notice. This can be done on all or part of the land, for example if only part of the land were to benefit from planning permission in the future. The remainder of the land could be retained for agricultural purposes.

Detailed technical and environmental assessments will be undertaken in due course to ensure that sufficient evidence is provided to underpin the allocation of the Site in the AAP. This will ensure the allocation is sound and based on proportionate evidence as sought by the NPPF.

Strategic Policy CL3: Local Character and the Form of New Development

Draft Strategic Policy CL3 highlights the need for the preparation and use of Area Wide Character and Design Assessments. The supportive text explains that the Council is responsible for preparing such documents, with the support of developers in their delivery. During the Regulation 18 consultation, Homes England raised concerns that this requirement, alongside local urban design framework plans and development briefs, design codes and three-dimensional masterplans, is too onerous.

Homes England considers these assessments are unnecessary for Crawley as a whole and this could delay development coming forward. Homes England considers that the Council should require these only for larger developments. Homes England reiterates that preparation of such documents is not an effective use of the Council's own resources and it should be for the landowner or developer to lead on the preparation of these assessments. In respect of a future extension to Manor Royal, Homes England suggests that this should form part of the AAP process itself. This would secure a positive design outcome as sought by Policy CL3, whilst avoiding a duplication of evidence base work.

Strategic Policy EC1: Sustainable Economic Growth

As noted by the NWSEGA Final Report (2020), Crawley represents the dominant commercial centre in West Sussex and drives demand for employment space. It is referred to by the Council as the "Heart of the Gatwick Diamond". The NWSEGA Report forms part of the Council's employment evidence base to inform the draft Plan.

The NWSEGA identifies a number of economic indicators that reinforce this, not least that Crawley attracts "significant activity and commands the highest rents" (Paragraph 5), compared to neighbouring districts. Crawley Borough has also experienced rapid job growth over the last 20 years, which exceeds both the South East and the UK averages. The Borough also records the largest employment base in North West Sussex, with particularly strong employment growth having been driven by transportation, storage and support services sectors.

The Coast 2 Capital LEP Strategic Economic Plan 2018-2030 sets out the LEP's objectives for economic development. The Plan targets a programme of growth under the vision of becoming the most dynamic non-city region in England. Key to this strategy is the intention to invest in sustainable growth through improvements to business infrastructure and space, recognising the opportunity to retain existing businesses, attract new industries and foster innovation.

Within the context of the NWSEGA, Draft Strategic Policy EC1 sets out the Council's growth ambitions for the Plan period. It points to a need for a total of 33 hectares of B Class business land in the Borough across the Plan period to 2035, of which 12 hectares is identified through intensification of existing sites. Homes England acknowledges and supports the Council's intention to intensify existing employment sites, by using a "brownfield first" approach as per the NPPF. The 21 remaining hectares of land is to be located on new sites through the future AAP, in the form of Strategic Employment Locations.

Homes England note that the NPPF expects strategic policies to provide a "*clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period*".

It is noted that the need figure presented by Policy EC1 is not a target. It is a minimum requirement and should be expressed as such. It is also conservative, especially so in the context of unconstrained need which is 113 hectares as explained by Paragraph 9.10 of the draft Plan.

The NWSEGA Report undertakes forecasting by drawing on 3 future scenarios:

- 1) Baseline Job Growth: forecast of job growth by sector based on recent trends and projections at the regional level versus historic growth in the region;
- 2) Past Development Rates: using past development rates to reflect market demand and development patterns to determine future space needs; and
- 3) Baseline Labour Supply: labour supply based scenario based on population projections and demographic assumptions to inform the Strategic Housing Market Assessment e.g. an assessment of housing growth and resident workforce and impacts on total labour supply.

The NWSEGA Report then concludes that the Council should apply the Past Development Rate (i.e. the 'mid-growth' scenario), as a minimum (Paragraph 8.74):

"It is therefore recommended that the Council consider planning to accommodate the past take-up based requirement as a minimum, to enable historically strong levels of employment development to continue in the Borough over the new plan period".

The Council has applied this scenario to Policy EC1. Homes England consider that there are shortcomings to this approach, and Paragraph 8.6 of the NWSEGA Report concedes that *"the ultimate judgement as to the level of need that [Crawley] should plan for is not purely quantitative, and that there will be a number of qualitative factors to consider"* (our emphasis).

The shortcoming of using this methodology is that it does not adequately recognise that supply side constraints have influenced past economic growth in the Borough. The business base in Crawley has diversified beyond its historic dependency on aviation and airport specific businesses to a broad business base including financial and professional, research and development, engineering and life sciences.

It is clear that there is suppressed demand in the market. This is evidenced by the following extract from the Coast 2 Capital LEP Commercial Property Study (2019), the key evidence base document which underpins the LEP's Draft Local Industrial Strategy. It identifies that:

"Agents indicate that the biggest challenge facing the Gatwick Diamond is a lack of land for development, restricting the ability for large occupiers to find appropriate space to locate and grow" (our emphasis).

The Commercial Property Study cites Unilever leaving Crawley to relocate to Leatherhead as an example of a lack of supply of premises for large businesses. This is despite Crawley's substantial economic growth potential, due to its public transport accessibility via the M23 and Gatwick Airport Train Station.

The same study identifies Crawley as a significant development opportunity by meeting the current demand for employment floorspace, particularly in logistics and research and development sectors which are growing sectors nationally. Discussions with commercial agents at Montagu Evans suggest that there is significant market demand for these sectors at Rowley Farm, as well as for commercial office space. The Council should be proactive in responding to growing markets through the Plan, particularly in the context of clear evidence to do so as noted above.

The clear market demand for B Class floorspace must be recognised by the Plan to ensure compliance with national policy, which requires planning policy to set out a *"clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies"* (NPPF Paragraph 81). The Commercial Property Strategy is

a key piece of evidence that will inform the LEP's emerging Local Industrial Strategy and so should be duly considered by the Council.

Further, the NWSEWA Report assesses employment needs based on the fixed geography of Northern West Sussex (comprising Crawley Borough Council, Horsham District Council and Mid Sussex District Council) which it considers to be a Functional Economic Market Area (FEMA). The FEMA is not a realistic reflection of the function of the true FEMA and this should be expanded to pick up on sub-regional demand in the wider strategic area straddling numerous additional Local Planning Authorities in south Surrey and west East Sussex. Sub-regional demand is greater than the area geographically limited to the Northern West Sussex FEMA.

The NPPF is clear that planning policies should help create the conditions for businesses to invest, expand and adapt. In doing so, *"significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development"*.

The Council should be seeking to harness the opportunities of the Gatwick Diamond and proximity to the airport, which is not currently being achieved by the draft Plan by utilising the Past Development Rates scenario. Should West of Ifield come forward for development, long term, significant housing growth will result in greater demand for jobs. The opportunity to locate employment in an area that can be accessed sustainably is logical and should be facilitated by the Council. As explained in Homes England's representations for West of Ifield, the future Western Link corridor will secure better integration with Manor Royal employment area. Investment in infrastructure to facilitate clean growth was identified by the LEP in its 2019 Local Industrial Strategy draft Economic Profile consultation. The Plan would be supporting this objective through planning for Crawley's growth in this way.

As such, the Council should be proactively looking at ways to align with market interest to facilitate business growth to meet current needs and future opportunities. Homes England will continue to engage with the Council and LEP in the development of the Plan and its policies in respect of economic development.

Policy EC1 and its supporting evidence base should be reviewed in light of the matters raised above to ensure the Plan can be found sound. Homes England suggests that the Council reconsiders the forecasting methodology and FEMA it is relying upon in the draft Plan, and subject to determining the need to retain a safeguarding parcel, increase the minimum requirement for employment land under Policy EC1.

Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road

Draft Strategic Policy ST4 of the Local Plan Review refers to a Search Corridor for a future Crawley Western Link linking the A264 to the A23. Homes England supports the general rationale for this route, noting the substantive benefits that could be achieved in mitigating traffic impacts along the A23/A2220, which are subject to congestion at peak times. This is crucial in fostering sustainable development as per Paragraph 8 of the NPPF.

The draft policy wording explains that the Search Corridor will be *"safeguarded from development which would be incompatible with the future delivery"* of the link. This is supported not least as it implies that the link will form a central aspect of the future AAP, which is crucial in unlocking strategic scale development at Rowley Farm in Crawley and the West of Ifield development in Horsham. Notwithstanding, the safeguarded corridor should be shown on the Local Plan Map as was the case for the Regulation 18 consultation version. This ensures that the Plan is legible and enshrines the future consideration of the alignment in policy. This would also

serve to provide flexibility if the safeguarding area reverts back to the area shown in the Regulation 18 consultation.

As stated in the representations for West of Ifield, Homes England's firm intention is to ensure that more detailed masterplanning and transport modelling is undertaken. This is necessary to inform the future AAP and development of proposals to the Land West of Ifield. It should include the work necessary to advance understanding of the Wider Strategic Opportunity and to inform the nature and function of any link.

Homes England accepts that the detailed alignment is developed as part of the future AAP but recommend that the Council also prepares the necessary evidence gathering to support this approach. Homes England also considers that the policy should provide reference to the potential need for land acquisition and assembly. While at this stage Homes England accept a delivery solution is not yet determined, the policy should ensure flexibility around the use of future land acquisition strategies.

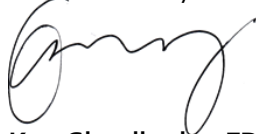
Homes England supports the potential route of the Crawley Western Link through the administrative area of Horsham and is actively engaging in the development of the Horsham Local Plan. The Plan should be explicit that Policy ST4 only relates to land within the administrative authority of Crawley Borough Council, but should reiterate the Council's commitment to joint working with Horsham District Council on this matter as part of the ongoing Duty to Cooperate.

Summary

It is clear that Rowley Farm represents a suitable, available and deliverable site, offering a realistic prospect for the delivery of a significant quantum of employment development through allocation in the future AAP. Homes England reiterates that the Council should seek to actively encourage economic growth in the context of Government policy, its own evidence base and the LEP objectives. The Council has a unique opportunity to drive economic development through plan-making, in delivering sustainable growth.

Homes England looks forward to working positively with the Council and other stakeholders in the development of the Local Plan and the AAP.

Yours faithfully



Ken Glendinning FRICS

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Crawley Borough Council
Strategic Planning
Town Hall
The Boulevard
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2nd March 2020

Dear Sir / Madam

CRAWLEY BOROUGH COUNCIL LOCAL PLAN REVIEW REGULATION 19

Please find enclosed representations to Crawley Borough Council's (CBC) Draft Local Plan Review 2020 – 2035 (Regulation 19). We are responding in our capacity as the Government's housing accelerator and as a major landowner / promoter with land interests within and adjoining the Borough boundary.

Homes England are an executive non-departmental public body, sponsored by the Ministry of Housing, Communities and Local Government. Homes England has the aspiration, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, Homes England are assisting in the delivery of the new homes England needs and is helping to improve neighbourhoods and grow communities. Homes England works in collaboration with partners who share our ambition. These include local authorities, private developers, housing associations, lenders and infrastructure providers. Within the next few years, Homes England will have invested over £27 billion across our programmes.

Homes England's mission is to ensure more homes are built in areas of greatest need, to improve affordability.

Homes England has a strong track record in acting as a 'master developer' on schemes such as the Northern Arc in Burgess Hill, Mid Sussex and Northstowe in Cambridgeshire. In the case of Burgess Hill, Homes England acquired the site, which had been identified as a location for major housing delivery for over 10 years but had stalled due to the complexities of land ownership and the need for upfront strategic infrastructure delivery. Homes England worked closely with Mid

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#MakingHomesHappen

Sussex District Council, the landowners and the site promoter to acquire the land. At the Northern Arc, Homes England are investing in the required infrastructure to secure early release of the first phases of development. Homes England is deploying our knowledge and delivery expertise to ensure that the scheme comes forward to meet local ambitions.

Purpose of Representations

Pursuant to Regulation 19 of Town and Country Planning Act (Local Planning) (England) Regulations 2012 these representations are made in respect of the Draft Local Plan to confirm our position in respect of the land interests described within this representation. Homes England also confirms herewith that it wishes in due course to participate in the relevant sessions of the public examination of the Draft Local Plan.

The content of this representation therefore sets out our position of support or objection to proposed policies. Where we propose amendments, these are made to ensure that the CBC Draft Local Plan fully meets the soundness test as set out in the National Planning Policy Framework (NPPF) (paragraph 35) therefore ensuring that the Draft Local Plan is positively prepared, justified, effective and consistent with national policy.

Documents Reviewed

In reaching the conclusions set out in this representation, we have reviewed the following Regulation 19 published consultation documents:

- Crawley 2035: Draft Crawley Borough Local Plan 2020 – 2035 (January 2020);
- Crawley 2035: Local Plan Map;
- Sustainability Appraisal/Strategic Environment Assessment Draft Report (January 2020);
- Habitats Regulations Assessment Screening Report (January 2020);
- Consultation Statement (Draft January 2020) and Appendices;
- Infrastructure Plan (January 2020);
- Northern West Sussex Strategic Housing Market Assessment Final Report (November 2019);
- Strategic Housing Land Availability Assessment (January 2020); and
- Retail, Commercial Leisure and Town Centre Neighbourhood Needs Assessment (January 2020) and Appendices.

In addition, we remain cognisant of the wider Draft Local Plan review evidence base and our representations made previously under Regulation 18 (July – September 2019).

Homes England Land Interests

Homes England own key sites which fall within the CBC Local Plan area. These landholdings comprise Land West of Ifield, Land at Rowley Farm, Land at Forge Wood and Land at Tinsley Lane.

These representations are written only in regard to Land West of Ifield and therefore other landholdings are not described. Separate representations have been submitted where necessary.

Land West of Ifield

This site comprises a specific priority for 2018-2020 in Homes England's Strategic Plan 2018/19¹. The objective is to progress the promotion of Land West of Ifield as a strategic growth area for a minimum of 3,250 new homes as part of a comprehensive approach to masterplanning and placemaking. This is alongside a published commitment to begin major infrastructure work and commence construction of the first homes on the site by 2022/23. This position has been established following collaborative work that dates back to 2008 and a long history of joint discussion with CBC, Horsham District Council (HDC) and West Sussex County Council (WSSC) with the intention to bring forward a sustainable new community in line with the principles of the Garden Communities prospectus².

The Land West of Ifield site primarily comprises arable and pasture fields bounded by hedgerows and mature trees together with Ifield golf course. Some isolated mature trees are present within some of the fields.

All the land being proposed for development is located within Horsham District, but a small portion of the wider site under Homes England's ownership lies within Crawley Borough (Ifield Brook Meadows Local Wildlife Site and Local Green Space).

For clarity and through this representation, Land West of Ifield is referred to as the site as shown as SA101 in the HDC Regulation 18 Local Plan. This site is under the control of Homes England.

At Land West of Ifield, Homes England will act as a master developer with the aim of seeking to accelerate the delivery of key infrastructure to facilitate housing delivery in an efficient and effective manner. Furthermore, acting as a master developer will enable Homes England to maintain the highest design standards across the scheme through the construction process as well as delivering significant social, economic and environmental benefits to the existing neighbourhoods of Crawley.

Wider Strategic Opportunity – Land West of Crawley Garden Town

Land West of Ifield is ideally located to make a significant contribution to the housing needs for Horsham and Crawley and Homes England are therefore in the process of exploring the potential for a wider strategic opportunity for an exemplar Garden Town West of Crawley that would be developed in partnership with CBC, HDC and WSSC.

We will utilise our expertise developed through the current Garden Communities programme that supports 23 locations and envisages the delivery of over 200,000 homes by the middle of this century. Homes England want to champion and support ambitious councils who see Garden Communities as a central to their plans for housing and growth.

A definitive boundary for the Wider Strategic Opportunity is yet to be determined, and a broad area of search is being considered. This comprises land located north of the A264 from Faygate in the west and extends in an arc north west towards Crawley, Gatwick Airport and the A23. To the east, the site adjoins the neighbourhood of Ifield, in Crawley and Gatwick Airport is to the north,

¹ <https://www.gov.uk/government/publications/homes-england-strategic-plan-201819-to-202223>

² Published 4 June 2019 by the Ministry of Housing, Communities and Local Government
<https://www.gov.uk/government/publications/garden-communities>

both of which are key urban influences in this area. Although adjacent to the busy road network, the area is predominantly rural in character.

The objective of the work related to the wider strategic opportunity is to explore the potential for approximately 10,000 residential dwellings, 10,000 jobs, and a range of infrastructure requirements that will meet the Strategic Housing Market Assessment requirements over more than one Local Plan period.

Part of this area of search is identified as 'Land West of Crawley' under the HDC Draft Local Plan Regulation 18 Consultation. This comprises HDC's Strategic Housing and Employment Land Availability Assessment sites SA101 and SA291 – Land West of Kilnwood Vale. Further land within the area of search is being promoted for housing development to the west of Kilnwood Vale, where the development of a new neighbourhood is already underway, through a positive joint planning approach between CBC and HDC.

This wider growth opportunity will span future Local Plans and it is envisaged that it will be brought forward collaboratively with HDC and the other key stakeholders.

At this stage, Homes England are exploring under the HDC Regulation 18 Draft Local Plan review appropriate delivery mechanisms but expect to strongly recommend that in order to provide long term certainty to housing delivery across plan periods together with the ability to realise the benefits of the wider strategic opportunity West of Crawley that land is safeguarded for future development beyond the Site Allocations identified in the HDC Regulation 18 Local Plan.

Benefits of a Wider Strategic Opportunity

Homes England has identified the potential for a wider strategic opportunity to be brought forward as part of Government's Garden Communities programme³. The benefits of exploring delivery of this wider strategic opportunity include:

- The opportunity to meet long term housing need in a policy compliant, comprehensively planned and sustainable manner – providing clarity around how long-term housing needs for both Horsham and Crawley (in line with the duty-to-cooperate) could be met, integrating with existing communities alongside the delivery of new infrastructure as part of a long-term comprehensive strategy.
- The opportunity to protect areas not suitable for development – providing high quality green space that safeguards natural habitats, provides accessible amenity spaces, achieves biodiversity net gain and ensures long-term defensible boundaries and protection against piecemeal development. This will also ensure that development can be planned sustainably with flood risk from all sources mitigated in order to protect current and future users of development and ensure that development does not increase flood risk elsewhere.
- Supporting significant investment in multi modal transport infrastructure – supporting the case for significant long-term investment, promoting the use of modern sustainable transport methods and safeguarding the opportunity to adapt to a low carbon future.

³ Homes England submitted Land West of Ifield as a proposal for a new Garden Community in November 2018

- Enabling a comprehensive approach to masterplanning and placemaking with early public sector investment enhancing the ability to create high quality, well planned places for the future in line with the objectives of the Building better, Building Beautiful⁴ agenda.
- The potential for the site to provide significant employment opportunities.
- A commitment to new schools, health facilities and other community facilities as part of accessible neighbourhood centres.

Homes England are committed to engaging the community in the design and planning process throughout the project and have undertaken initial consultation through a series of public exhibitions in venues around Crawley and Horsham through January 2020. This consultation focused on public engagement, seeking to appreciate and understand local issues and aspirations for the site. The events were well attended with a total of 726 members of the community visiting over the eight days. 251 feedback forms were received from the exhibitions; in addition to 305 online forms were completed. Engagement will continue with further events scheduled for later in 2020 to test design ideas and concepts. Further information regarding these events will be found online⁵ and Homes England will be seeking to publish comprehensive feedback in due course ahead of initial masterplanning.

Publication Consultation Draft: Regulation 19: Homes England Representations

Strategic Policy SD3: North Crawley Area Action Plan

Homes England welcome the insertion of Strategic Policy SD3: North Crawley AAP and concur with the Council that, at this stage, there is no robust evidence that justifies the continued safeguarding of land for Gatwick Airport expansion. This follows Gatwick Airport Limited (GAL) having confirmed (29th August 2019)⁶ the process is now underway for the submission of a Development Consent Order seeking permission to bring its northern runway alongside the main runway by the mid-2020s.

In light of evidence available, Homes England agree that the AAP will allow for a pragmatic approach that enables the safeguarding position to be considered first through this Local Plan, with greater time then allowed for the for the growth needs of the Airport to be demonstrated by GAL. The future protection of any land for airport purposes can then be justified alongside consideration of growth potential of the borough in a less constrained scenario and against other development needs as part of the work on the AAP.

Homes England note the intentions to commence work on the AAP within three months of adoption of the Local Plan and request to be notified at the earliest possible stages to ensure this process can be supported appropriately.

Homes England accept and acknowledge that the Local Plan proposals at this stage will continue to apply the same protections of the previous safeguarding policy to the area identified in the Gatwick Airport Masterplan 2019 until the AAP is eventually adopted.

⁴ <https://www.gov.uk/government/groups/building-better-building-beautiful-commission>

⁵ www.westofield.co.uk

⁶ <https://www.gatwickairport.com/business-community/future-plans/long-term-plans/>

Land at Rowley Farm

In connection with proposed intent to prepare an AAP, Homes England wish to reiterate our consideration that Land at Rowley Farm which is located immediately to the south of Gatwick Airport and abuts the Manor Royal employment area to the east and south should be considered as a logical extension of the Manor Royal Employment Area (Draft Local Plan Policy EC3) under this AAP process.

The justified release of this land from safeguarding through the AAP will provide a significant opportunity to support CBC in meeting development needs within the Borough's boundaries and, as set out in the Economic Growth Chapter, would directly support Policy EC1 which sets the approach to planning for employment needs and references the market preference for this with the Crawley/Gatwick area.

Development of the site for Employment use would assist the support and growth of the Gatwick Diamond and contribute to its future success. The importance of the Crawley/Gatwick area to the economic development strategy is acknowledged in the Draft Local Plan where it states at paragraph 9.2 that it *"To promote the continued prosperity of the Gatwick Diamond and plan for its future growth, a Gatwick Diamond Local Strategic Statement 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"*

The site would also strengthen the strategic importance of The Coast to Capital LEP and the Gatwick 360* Strategic Economic Plan to deliver eight economic priorities, one of which seeks to develop business infrastructure and support. There is already a known demand for new, high-quality business space and the site would create a logical extension to Manor Royal, providing the ideal opportunity to encourage further economic growth building on existing infrastructure allowing the cluster of economic activity to grow.

Homes England confirms that the Land at Rowley Farm is available for development in the short term and would be confident in demonstrating its complimentary relationship to development potential of Land at West of Ifield.

We would also be confident demonstrating compliance with other relevant policies such as Strategic Policy CL8: Development Outside the Built-Up Area which records *the area within the Upper Mole Farmlands Rural Fringe where proposals must not create, or are able to adequately mitigate, visual/noise intrusion will be generally supported.* The draft policy recognises that 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.* Homes England are confident development of Rowley Farm would meet such requirements and Homes England expect to support justification of this under the processes committed to under Policy SD3 and development of the AAP.

Strategic Policy CL8: Development Outside the Built-Up Area

This policy deals with development outside of the built-up area. One of the character areas identified is the *"West of Ifield Rural Fringe"* within which *"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."*

Whilst Homes England generally supports this policy and agrees that the location of new development should be carefully considered, the potential relationship to wider housing growth and the need for housing across the wider area must also be addressed.

However, in accordance with the long held recognition of the potential for this area to the west (HDC Local Plan Regulation 18 Site Allocation 'West of Crawley') to present an opportunity to contain essential links to new housing, Homes England maintains the position that the policy should acknowledge the potential for pedestrian and cycle links across this area to link any new development (which will include amenities such as schools to meet demand in Crawley) to existing communities. The following alternative amendments to Policy CL8 'West of Ifield Rural Fringe' are proposed as underlined:

"proposals which respect this area of locally special rural fringe, its nature conservation and recreation value, its positive relationship with the urban edge will be encouraged while recognising the potential for appropriately planned and designed pedestrian and cycle links between the edge of the existing settlement and potential new development to the west. Such links must respect the Local Green Space designation which is relevant to the area's particular qualities of nature, heritage, recreation, landscape, tranquillity and access to the wider countryside.

This amendment is necessary to fulfil CBC's duty to ensure the plan is positively prepared and effective thus acknowledging and providing flexibility for the Land West of Ifield Site Allocations and wider strategic opportunities being considered through the preparation of the Horsham Local Plan to be brought forward also ensuring maximum opportunity to link with existing neighbourhoods. Failure to acknowledge this would also make CL8 inconsistent with other policies with the CBC Local Plan, for example Policy H3g (x) discussed below, and Policy CL4 (5)(ii) and (iii) that require major development to connect development to areas of rural open space/green space and to ensure new route alignments follow direct desire lines allowing for through routes to be straight and direct, providing clear, legible and obvious linkages to adjoining areas.

In accordance with the Reasoned Justification this wording is consistent with CBC's acknowledgement that *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.* The proposed change also accords with the main aim of CL8 which is to ensure that these areas do not become suburban in nature.

Strategic Policy H1: Housing Provision

Homes England continue to support CBC's commitment to working with neighbouring authorities in the Northern West Sussex housing market area to explore the potential for urban extensions to Crawley as this accords with paragraph 72 of the NPPF in that, *'The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.'*

Strategic Policy H3g: Urban Extensions

Homes England recognise the purpose of this policy is to allow CBC to articulate the expectations of the Council should development come forward in areas adjoining its administrative boundary. This is particularly important given the ongoing commitment of CBC to work closely with its neighbouring authorities and consider the unmet needs of Crawley over the Plan period and potentially beyond. This includes working with HDC in considering the potential allocation of the land to the West of Crawley through the emerging Horsham Local Plan, as is being promoted by Homes England.

Policy H3g deals specifically with urban extensions and notes that 'Housing development through urban extensions on or close to Crawley's administrative borough boundaries will be supported by CBC where it can be shown that they meet listed criteria.

Whilst Homes England recognise and generally support the intention of this policy; we note that CBC cannot set policy for a neighbouring district. To remove any ambiguity, Homes England recommend that the introductory paragraph is amended as follows:

"Housing development through urban extensions within or close_Crawley's administrative borough boundaries will be supported by Crawley Borough Council where it can be shown that they meet the following criteria. Where development may be adjoining the administrative boundary, the criteria below sets out Crawley Borough Council's expectations."

The following comments relate to criteria listed under H3g where they may impact on proposals relevant to Land West of Ifield and the wider strategic opportunity to the west of Crawley as identified in the HDC Reg 18:

- ii. *The proposals are supported by a comprehensive Masterplan agreed by the relevant authorities (including the county council), in line with the expectations of Policies CL2 and DD1;*

Homes England request that the statement that a masterplan is to be agreed by the relevant authorities (including the county council) is removed from this criteria. Any planning application and associated masterplan can only be agreed through the planning application process, and as such will be determined by the relevant local planning authority receiving and determining the application. It is recommended that this criteria is updated as follows:

- ii. *The proposals are supported by a comprehensive Masterplan agreed by the relevant planning authority. (including the county council), in line with the expectations of Policies CL2 and DD1;*

This amendment is necessary to fulfil CBC's duty to ensure the plan is consistent with national policy.

- iv. *If development is proposed to the western side of Crawley, the scoping, design and delivery of the comprehensive Western Link Road (connecting from the A264 to the A23, north of County Oak, Policy ST4) should be agreed and provided prior to the completion of properties unless otherwise agreed by the three local authorities: Horsham District, Crawley Borough and West Sussex County Councils;*

Homes England continue to acknowledge that the scoping of the Western Link is a critical aspect of advancing the understanding of any potential major development proposals to the Land West of Ifield.

Homes England's objective is to ensure that more detailed masterplanning and modelling of development to the Land West of Ifield, including the work to advance understanding of the wider strategic opportunity, is able to inform the nature and function of any Western Link and that the impact on the existing highway network is therefore beneficial. At this stage, without detailed design / modelling, it is necessary to ensure that the policy does not require an overly prescriptive determinant of the nature of the link and resultant impact on the type of place we are able to create. The precise delivery requirements of this policy are therefore premature.

Homes England therefore suggest the wording is amended as follows to recognise that it may be necessary to deliver a Western Link in parts, and subject to design development / modelling it may take on a different form and function as it relates to different parts of the development.

All work to progress understanding will be undertaken in consultation with the three local authorities. Any significant housing development to the Land West of Ifield and across the wider strategic opportunity would be completed over a long time period and the justification may not be made for the whole of the Western Link to be completed before any dwelling is occupied. There is currently a lack of available evidence to justify any form or function and therefore conclusions around its delivery must be reserved. It must also be noted that this policy can only relate to that area safeguarded by Policy ST4 and references to any complete link are beyond the CBC administrative area and therefore outside the control of the Draft Local Plan policy. These amendments are necessary to fulfil CBC's duty to ensure the plan is justified, effective and based on evidence.

If development is proposed to the western side of Crawley, the scoping, design and delivery of the ~~comprehensive~~ Western Link Road should enable high quality sustainable transport opportunities for both existing and new communities, therefore reducing the impact on the existing highway network. The appropriate phasing of the link will be prior to the completion agreed by the three local authorities: Horsham District, Crawley Borough and West Sussex County Councils. The identification of the alignment for a Western Link through land within Crawley will form part of the work on the North Crawley Area Action Plan (Policy SD3), which will be determining appropriate land uses across the whole area south of the airport, including possible future expansion of the airport.

ix. 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;

Whilst Homes England recognises the important role Land West of Ifield and the potential a wider strategic opportunity could play in meeting Crawley's unmet housing needs, Homes England are concerned about the level of prescription and detail, with potential differing approaches and considerations in relation to affordable housing between CBC and HDC.

Firstly, the CBC Draft Local Plan cannot lawfully set the policy requirements in relation to affordable housing on land outside of the CBC administrative area. This will be a matter for HDC, albeit clearly involving close collaboration and working with CBC as part of the preparation of the Horsham Local Plan. Secondly, policy cannot be set in the absence of fully testing the implications on overall viability for any proposals emerging in the Horsham Local Plan. In accordance with the NPPF (para 57), site allocation policies should set out the contributions (including affordable housing) based on viability testing as part of plan led process – this requirement therefore runs contrary to the NPPF.

Homes England are fully committed to ensure more homes are built in areas of greatest need and to improve affordability. In order to progress this matter, Homes England recommend that the pre-application discussions are focussed to allow the authorities to discuss this matter early and agree a Statement of Common Ground. This will ensure alignment upon housing delivery expectations (including affordable housing, type and tenure).

- x. 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 into existing Crawley neighbourhoods and the town centre, making car journeys a longer, more circuitous option;

Homes England support the planned level of integration and the commitment to sustainable modes of transport. In order to maintain linkages from existing neighbourhoods through and into new neighbourhoods, the policy will need to be sufficiently flexibility to enable the provision of links for sustainable modes of travel through Ifield Brook Meadows and Rusper Road Playing Fields such as for some form of pedestrian and cycling connectivity. This is why Homes England continues to comment on Policy GI4 and Policy CL8 which are considered to be too limited and which set an unreasonable test in relation to provision of linkages across this area.

Strategic Policy GI2: Biodiversity and Net Gain

Homes England are pleased to see the updates made to this policy and the insertion of reference to a 10% net gain for biodiversity.

Paragraph two of the policy refers to the condition under which offsite provision will be acceptable and states that this will be in the form of "*equivalent financial contributions*". Homes England asks in the interests of retaining a flexible approach, "*...or agreed alternative*" is added to this text, to enable developers to secure offsite ecological compensation using land they own or lease for this purpose or through an alternative arrangement with a third party, in agreement with CBC. The requested amendment would read as follows:

In the first instance, net gain for biodiversity will be expected to achieve a minimum 10% net 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 or agreed alternative, be agreed.

In terms of the reference to early discussions taking place with GAL to minimise the risk of bird strikes, Homes England welcome the inclusion of proposed amendments with the insertion of 'as far as possible' and consider this will support discussions to ensure a 10% net gain on-site.

Strategic Policy GI4: Local Green Space

Homes England agrees with the Council's evaluation of the value and role of Ifield Brook Meadows and Rusper Road Playing Fields. However, Homes England does not agree with the approach suggested in the policy that any development in this area should satisfy a test of "very special circumstances" as this approach is not consistent with the wording in the NPPF at paragraph 101 where it states that the 'policies for managing development within a Local Green Space should be consistent with those for Green Belts'. The policy, as written, focuses on solely the very special circumstances element of national Green Belt policy and makes no reference to their being certain forms of development which are not inappropriate development provided they preserve its openness and do not conflict with the purposes of including land within it including 'local transport infrastructure which can demonstrate a requirement for a Green Belt location' (paragraph 146). The tests therefore need to be consistent with the protection of the Green Belt as a whole and not simply stating a need to pass the very special circumstances test.

This change would be consistent with the Reasoned Justification which specifically references "national Green Belt Policy".

Homes England do, however, support the amendments made to Policy H3g x1, xii and xiii which more clearly demonstrate the process of assessment needed to justify the appropriateness of development in this area. Therefore, Policy GI4 should be amended for consistency with those Policies.

Homes England also note Policy OS3 Rights of Way and Access to the Countryside which is pertinent here and recognises upgrading of routes across Ifield Meadows could be supported to enable improved access both for existing and new residents.

Homes England would also recommend an amendment to policy wording that removes any subjective terminology. The proposed amendment is as follows and necessary to fulfil CBC's duty to ensure the plan is justified and consistent with National Planning Policy.

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 instances that can be proven consistent with criteria listed at paragraphs 145 and 146 of the NPPF.~~ and will ~~is to enhance Local Green Space functions, for example, through improvements to access, recreation and wildlife.~~

Policy ST3: Improving Rail Stations

In light of the identified potential for the possible westwards expansion of Crawley, Homes England are pleased to see that amendments recommended under Regulation 18 have been

incorporated that clearly identify the potential to strengthen the role of Ifield a suburban rail station in order to meet the needs of any increases in rail patronage.

Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road

The CBC Draft Local Plan makes various references to the possible westward expansion of Crawley into Horsham. This spatial development strategy is supported by Homes England. In relation to this, Policy ST4 identifies a Search Corridor for a Crawley Western Link Road (CWRR) as it could be located through the southern edge of land historically safeguarded for a potential future runway at Gatwick Airport. The policy confirms that the Search Corridor within the CBC administrative areas will be safeguarded from development which would be incompatible with the future delivery of a full CWRR.

Whilst Homes England accept that further assessment of this area will be subject to Policy SD3 and the AAP Homes England consider that the safeguarded corridor should be as shown under the Regulation 18 Policies Map and should ensure that full consideration of the alignment as it could progress through Rowley Farm is also deferred to the AAP.

As stated under the representations under Policy H3g, Homes England's firm objective is to ensure that more detailed masterplanning and transport modelling to inform the development of proposals to the Land West of Ifield, including the work to advance understanding of the wider strategic opportunity, is able to inform the nature and function of any link.

Homes England also consider that the policy should provide reference to the potential need for land acquisition and assembly. Whilst at this stage Homes England accept a delivery solution is not yet determined, the policy should ensure flexibility around the use of future land acquisition strategies.

Finally, the wider reference to the potential route through the administrative area of Horsham will be addressed through the evolution of the Horsham Local Plan, which will include ongoing joint working between both HDC, CBC and all relevant stakeholders. The wording in ST4 will therefore need to be amended to be clear that it can only apply to the part being considered within the CBC area.

On the basis of the above commentary Homes England recommend policy wording is amended so as to ensure that is both Justified and Effective.

The Local Plan Map identifies a Search Corridor for a Crawley Western Link ~~Road~~ linking the A264 with the A23. This Search Corridor within the Crawley Borough Council administrative area will be safeguarded from development which would be incompatible with the future delivery of a full Crawley Western Link ~~Road~~.

Once the AAP to be prepared in accordance with Policy SD3 is adopted this policy will be superseded with more detailed guidance contained within the AAP.

The design and route of the Western Link ~~Road~~ must take account of:

a. its impact on (but not limited to):

- o residential properties close to the route;*

- *the flood plain;*
- *the rural landscape;*
- *local biodiversity; 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. The Potential requirements and implications of any necessary phasing and land assembly

Connectivity by non-vehicular modes of transport between Crawley's urban neighbourhoods and the wider Sussex countryside should be maintained and enhanced.

Strategic Policy EP4: Development and Noise and Crawley Local Plan Noise Annex

The Annex provides policy context and establish locally specific guidance through which the approach of Local Plan Policy EP4: Development and Noise should be applied.

Homes England request confirmation that the noise contours referenced in draft policy (Air Noise Map – Additional Runway – Summer Day – 2040 as shown at Plan 31 of the Gatwick Airport Master Plan 2019) are the latest and most appropriate noise contours to be used as a basis for 'Planning applications for noise sensitive development'? The 2019 Gatwick Airport Master Plan refers to 2017 actual noise contour data, whereas 2018 data is available. Furthermore, the 2019 Gatwick Airport Master Plan doesn't provide a date when the modelling was undertaken, but potentially suggests it is associated with a 2014 assessment. It is understood in general that these noise maps are regularly updated and take account of improvements in noise modelling software. Furthermore, it is recognised that 2050 noise contours have been prepared previously and therefore it is questioned why the 2040 contours are used specifically.

If the referenced noise contours are to be used for planning applications unless otherwise confirmed through the AAP once it is adopted, then it is suggested that the noise contours should be the very latest available based on the most recent actual noise mapping and noise modelling.

Draft Infrastructure Plan

Homes England acknowledge the updates made to the Draft Infrastructure Plan since comments made under Regulation 18. It must be acknowledged that the total infrastructure requirement to mitigate development at Land West of Ifield is yet to be fully determined. Requirements to mitigate impact will be determined as masterplanning advances and the scheme is subject to planning and environmental assessment. This will also include engagement with relevant statutory consultees and service providers to ensure that infrastructure requirements are planned with foresight of longer-term ambitions and the wider strategic opportunity that exists West of Crawley.

Under the section covering Transport and Bus Provision, Homes England consider that there should be explicit reference under the 'Future Studies and Plans' section that references the intent to support upgrades of the busway in accordance with expected growth.

Homes England are committed to sharing updates at the earliest possible stage.

Sustainability Appraisal / Strategic Environmental Assessment

Homes England acknowledge the updates made to the Regulation Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) since comments made under Regulation 18. We note CBC's Regulation 18 response that notes Paragraph 2.14 of the SA that explains that the focus of the Local Plan is upon Crawley Borough, but that growth to meet Crawley's unmet needs may take place in neighbouring authorities, and that the SA/SEA for these developments would be the responsibility of the relevant Planning Authority. With all comments addressed under re-drafting, Homes England have no further comment and consider the document sound.

Please contact me if you would like to discuss any points raised in this submission. In the meantime, I would be grateful if you could continue to keep Homes England informed in relation to the CBC Local Plan and progression towards Examination.

Yours faithfully,



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